



Denbighshire
Local Development Plan
2006 -2021

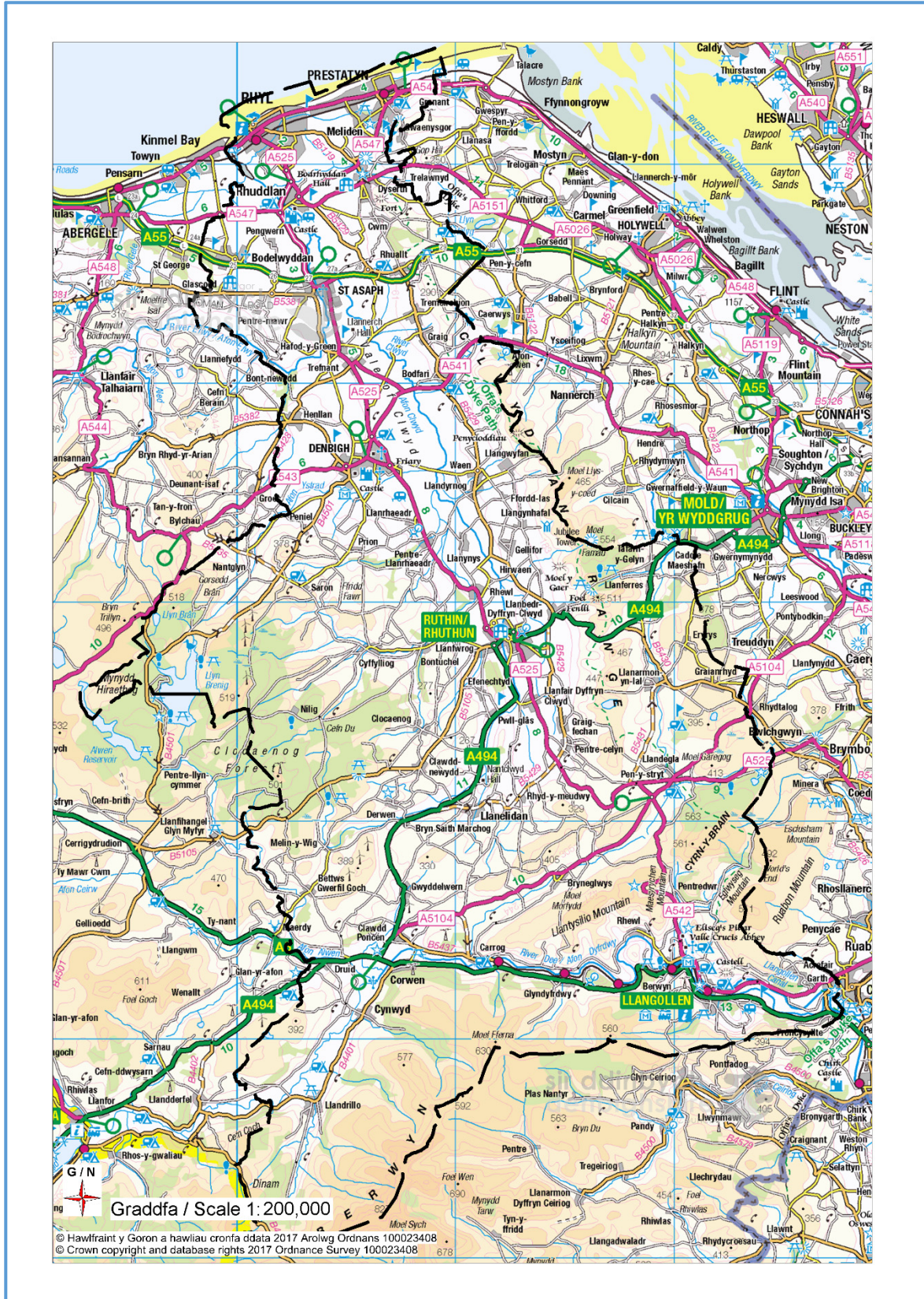
Information Paper:
Promoting a Sustainable Economy

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Appendix I

Map 1 The County of Denbighshire in North Wales



1. Background

1.1 Purpose of the document

1.1.1 Denbighshire County Council (DCC) produced 'Information Papers' (IPs) in support of the emerging five Denbighshire Local Development Plan 2006 – 2021 (LDP) themes in August 2011. The purpose of these documents was to summarise baseline data, evidence and pertinent information regarding the development of the Deposit Local Development Plan. The LDP was subsequently adopted in 2013, containing the following themes:

- Respecting Distinctiveness (RD)
- Building Sustainable Communities (BSC)
- Promoting a Sustainable Economy (PSE)
- Valuing Our Environment (VOE), and
- Achieving Sustainable Accessibility (ASA).

The themes' abbreviation is reflected in the name of local policies to group related topics and ease of reference.

1.1.2 DCC is under the obligation to review its adopted land use plan at intervals not longer than four years from adoption in line with Section 69 of the Planning and Compulsory Purchase Act 2004. This includes the review of LDP objectives, LDP themes, and local policies on the basis of significant contextual change, significant concerns from the findings of the Annual Monitoring Report (AMR), and other legal responsibilities that have an effect on the performance of the LDP.

1.1.3 The Council has just started the process of reviewing the LDP. At this stage there are no draft revised LDP objectives, LDP themes, or local policies. The majority of text is concerned with legislation, strategies and programmes, statistical analyses, and policy performance as identified in the AMR, together with potential impact on adopted LDP policies. The Council's intention is that these Information Papers are 'living documents'; i.e. they are updated with evidence and information as the revised LDP progresses through the individual stages of Plan production.

1.2 Introduction to the theme 'Promoting a Sustainable Economy'

1.2.1 Promoting a Sustainable Economy (PSE) is concerned with supporting the local economy in Denbighshire. It is not limited to providing a range of employment opportunities but addresses deprivation, regeneration activities and adaptation. The theme is broadly subdivided into the following topics:

- Local Economy (focussing on employment premises);
- Retail economy;
- Visitor economy (tourism); and
- Minerals.

1.2.2 Local policies within this theme are not only designed to support well-established, traditional businesses but also provide the planning framework for start-up entities and economic growth sectors. The thrust is to move towards a balanced

population structure and encouraging the retention of younger, skilled, and economically active members of society. In return, retaining younger people has crucial implications for strengthening the cultural and linguistic character of the County.

2. Policy Context

2.1 Introduction

2.1.1 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 well-being 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.

2.1.2 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.

2.1.3 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.

2.1.4 There are a vast number of national policies and frameworks, regional plans, and local strategies that did not only inform the production of the LDP but also have an impact on the delivery of individual development proposals. The purpose of this section is to review the document baseline, i.e. identify changes to existing documents, assess the effects of new or emerging documents, and highlight potential discrepancies with adopted local policies. This will be a crucial step before discussing local policy revision in light of changing local circumstances.

2.1.5 Local Development Plans in Wales are expected to integrate with other legislation, strategies, plans etc. without unnecessarily repeating national planning policy. National policy is laid out in Planning Policy Wales, which is supplemented by a number of Technical Advice Notes.

2.2 National Policy

- 2.2.1 National planning policy is set out in Planning Policy Wales (PPW), incorporating the previously published Minerals Planning Policy Wales in Chapter 14, and is supplemented by a series of Technical Advice Notes and Minerals Technical Advice Notes. Welsh Government frequently publishes 'Policy Clarification Letters' that provide advice and guidance on specific topics.
- 2.2.2 PPW is the most significant source of information when drafting local policies. The Local Development Plan Manual sets out the requirement that LDP's should not repeat national policy but local planning authorities may wish to supplement them where local circumstances require a specific local policy interpretation. Table 1 identifies those national policies that were considered to be of relevance at the time of producing the LDP theme 'Promoting a Sustainable Economy' and associated local policies. It further serves as a baseline to identify any changes in national policy and the likely effects on the local plan.
- 2.2.3 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 safeguarding respective areas.
- 2.2.4 Technical Advice Note 4: Retail and Commercial Development (November 2016) complements Planning Policy Wales in setting out Welsh Governments objectives for retail and commercial centres. It provides policy interpretation and guidance on the tests of retail need and sequential approach to development, detailed requirements for a retail impact assessments and the advantages of carrying regularly out 'health checks'. Local Planning Authorities (LPAs) are encouraged to produce local policies on retail that are sufficiently flexible to cater for changes in customers' needs, shopping patterns and allow for complementary forms of land use to maintain the viability and viability of High Streets.
- 2.2.5 Technical Advice Note 23: Economic Development (February 2014) provides advice on various subjects relating to developing high local economic planning objectives, assessing the economic benefits of new development, and economic development in rural areas. It also sets out how economic development should be considered throughout the Local Development Plan process. Further information on the determination of employment land supply and employment land monitoring is provided in an additional practical guidance note.

2.2.6 Table 1 Link between national and local policy

National Policy (with reference to PPW Edition 9)	Where addressed in the LDP?	Any changes required to comply with National Policy?	Comments
Sustainable Settlement Strategy: locating new development (para. 4.7)	PSE 1: North Wales Coast Strategic Regeneration Area; PSE 2: Land for employment uses	PSE 1 needs to be reviewed due to factual changes (see section 3.2).	There is an overlap with all LDP themes as the Growth Strategy lies at the heart of the Plan.
Sustainable Economic Development (Chapter 7 and Technical Advice Note 23)	PSE 1: North Wales Coast Strategic Regeneration Area; PSE 2: Land for employment uses; PSE 3: Protection of employment sites and buildings; PSE 4: Re-use and adaptation of redundant rural buildings in open countryside; PSE 5: Rural economy	PSE 1 needs to be reviewed due to factual changes (see section 3.2). There is no requirement to change other local policies in light of national policy.	Local policies are applied in combination with LDP themes 'Building Sustainable Communities', 'Valuing Our Environment', and 'Respective Distinctiveness'.
New locations for hazardous development and special industrial uses (para. 7.6.4)	PSE 2: Land for employment uses	There is no requirement to review local policy in light of national policy.	Local policy is supported and applied in combination with LDP theme 'Valuing Our Environment'.
Retail and Commercial Development (Chapter 10 and Technical Advice Note 4)	PSE 6: Retail economy; PSE 7: Proposals for new retail development; PSE 8: Development within Town Centres; PSE 9: Out of centre retail development; PSE 10: Local shops and services	There is no requirement to review local policies in light of national policy.	Local policies support LDP theme 'Building Sustainable Communities'.
Agricultural Development Proposals (para. 7.6.5 and Technical Advice Note 6)	PSE 4: Re-use and adaptation of rural buildings in open countryside; PSE 5: Rural economy	There is no requirement to review local policies in light of national policy.	Local policy is supported and applied in combination with LDP theme 'Building Sustainable Communities' and 'Valuing Our Environment'.

Tourism (para. 11.1 and Technical Advice Note 13)	PSE 1: PSE 1: North Wales Coast Strategic Regeneration Area; PSE 11: Major new tourism developments; PSE 12: Chalet, static and touring caravan and camping sites; PSE 13: Coastal tourism protection zones; PSE 14: Outdoor activity tourism	PSE 1 needs to be reviewed due to factual changes (see section 3.2).	Local policy is supported and applied in combination with LDP theme 'Building Sustainable Communities', 'Respecting Distinctiveness' and 'Valuing Our Environment'.
Minerals (Chapter 14 and Minerals Technical Advice Notes 1 and 2)	PSE 15: Safeguarding Minerals; PSE 16: Mineral Buffer Zones; PSE 17: Future Mineral Extraction	Whilst local policies broadly comply with national policy, review is required to reflect replaced or updated Welsh Government targets.	Local policy is supported and applied in combination with LDP theme 'Respecting Distinctiveness' and 'Valuing Our Environment'.

2.3 Wales Spatial Plan (Update 2008)

- 2.3.1 Originally published by the Welsh Assembly Government (WAG) in November 2004 and subsequently updated in July 2008, the document aimed to implement WAG's overall policy priorities as set out in One Wales: A Progressive Agenda for Wales. The focus was on linking up national, regional, and local activities; providing a national framework for planning. Its objective was to place a strong emphasis on the implementation of the 'sustainable development' principle in all public sector decision-making.
- 2.3.2 The Planning and Compulsory Purchase Act 2004 (Section 62) places a duty on Welsh local planning authorities to have regard to the Wales Spatial Plan (WSP) when preparing their local development plan. That means that the WSP has served multiple purposes in the Denbighshire plan-making process: (1) it produced evidence; (2) it shaped local policies; (3) it ensured better engagement and governance between bodies; (4) it informed Plans; and hence (5) it aligned prospective investments in the area.
- 2.3.3 The Wales Spatial Plan demarks Wales into six sub-regions; with outlining their cross-border relationships. Individual parts of the County of Denbighshire have accordingly been assigned to the North East Wales region and Central Wales region. It was however recognised that there are also strong relations with the North West (Wales) region. All six sub-regions, i.e. spatial plan areas, are profiled

by key settlements, inner-regional population distribution, socio-economic hubs, places of economic activities, etc.

- 2.3.4 To align the Denbighshire Local Development Plan with the Wales Spatial Plan, the Council took the decision to structure its land use plan in accordance with the five WSP themes:
- Respecting Distinctiveness;
 - Building Sustainable Communities;
 - Promoting a Sustainable Economy;
 - Valuing Our Environment; and
 - Achieving Sustainable Accessibility.
- 2.3.5 The WSP stipulates that employment-related property development should be located near public transport and close to housing and infrastructure developments. There is also concern that out-of-town retail development risks undermining the regeneration and viability of town centres as well as contributing to unsustainable traffic patterns.
- 2.3.6 The vision for the North East Wales sub-region is for ‘an area harnessing the economic drivers on both sides of the border, reducing inequalities and improving the quality of its natural and physical assets.’ Broadening the economic base is considered to be of importance for providing high quality employment opportunities in Denbighshire.
- 2.3.7 A key element of the spatial strategy is developing and supporting strategic hubs, including one around Rhyl – St Asaph – Bodelwyddan – Prestatyn as a focus for investment in employment, housing retail, leisure and services. The A55 trunk road and the rail network are seen as key in linking opportunities between the regions and creating more employment growth.
- 2.3.8 Appendix 1 identifies how the priorities set out in the Wales Spatial Plan have been taken into consideration and where applicable where they have been addressed through local policies and land allocations in the Denbighshire LDP.
- 2.3.9 The Welsh planning system is currently in a phase of transition. There has been new primary legislation in Planning and also in the closely-related fields of built heritage and environmental protection. This led (and is likely to continue) to the introduction of subordinate regulations, national policy and guidance notes. A major change for strategic planning is the introduction of a National Development Framework for Wales, which is going to replace the Wales Spatial Plan in 2021. Denbighshire is therefore challenged to have regard to the provisions of the WSP whilst working towards compliance with the emerging National Development Framework when producing the revised LDP for the County.

2.4 National Development Framework for Wales

2.4.1 Derived from the provisions of the Planning (Wales) Act 2015, the National Development Framework for Wales (NDFfW) will provide direction for Strategic and Local Development Plans and support the determination of developments of national significance. Whilst the WSP was concerned with the 'sustainable development' principle, the NDFfW is going further in implementing the provisions of the Well-being of Future Generations (Wales) Act 2015.

2.4.2 The NDFfW preparation process has just started with a call from Welsh Government for evidence and potential projects that could be considered for inclusion. Welsh Government are planning to undertake consultation on the Issues, Options & Preferred Options for the NDF in April 2018, with consultation on a draft Framework in July 2019, consideration by Welsh Government in April 2020 and publication of the final document anticipated in September 2020.

2.4.3 It is difficult to outline any effects of the emerging NDFfW on the revised LDP with very limited information available to the local planning authority at present.

2.5 Plans, Programmes and Strategies with relevance to LDP theme

2.5.1 There are a large number of plans and strategies which have the potential to impact on the Local Development Plan. The purpose of this section is to demonstrate how key plans and strategies have been taken into account during the development of this theme.

2.5.2 The Denbighshire Local Development Plan 2006 – 2021 was produced on the basis of national and regional plans, strategies or programmes current at that time. Some may have been superseded, withdrawn or have expired. The following paragraphs refer only to those documents that are of bearing in 2017.

Denbighshire County Council:

Corporate Plan 2012 – 2017: A Council, Close to the Community

2.5.3 The Corporate Plan sets out the overarching priorities for the term of the Council. Its priorities are supported, implemented and delivered through a number of strategies whereof the Local Development Plan and the Housing Strategy are crucial instruments. The following corporate priorities are of relevance to the LDP theme 'Promoting a Sustainable Economy':

- Developing the local economy;
- Ensuring access to good quality housing; and
- Modernising the council to deliver efficiencies and improve services for our customers.

2.5.4 The Council will produce a new Corporate Plan for 2017 – 2022. Corporate priority may be subject to change depending on political programmes, ambitions and the Council's political composition. It is however not expected that the principles will

significantly change depending on details. After the new Corporate Plan has been adopted by the Council further work can be undertaken to look at local policy compliance and the likelihood of changes to LDP Objectives and local policies.

Denbighshire County Council:

Economic & Community Ambition Strategy 2013 – 2023

- 2.5.5 The Economic & Community Ambition Strategy (ECAS) has been developed to explain how the Council will achieve the corporate priority ‘Developing the local economy’. Its overarching aim is to help businesses go from strength to strength; offering good quality, well-paid and rewarding jobs for local communities; and providing residents with a means to enjoy a good quality of life in towns and rural areas.
- 2.5.6 There are six themes contained in the document that detail the Council’s ambition, selected actions and monitoring measures.
- Infrastructure for growth;
 - Supported and connected businesses;
 - Opportunities for growth;
 - High quality skilled workforce;
 - Vibrant towns and communities; and
 - Well promoted Denbighshire.
- 2.5.7 Whilst local policies on employment land allocations and protection address opportunities for (spatial) growth and the provision of infrastructure, local policies on retail aim to maintain and enhance the vibrancy and vitality of towns and communities. The LDP accordingly symbolises the spatial dimension of the ECAS by allocating land for employment use, retail development, and community facilities.

Denbighshire Business Demand Study (January 2015)

- 2.5.8 The purpose of this study was to provide an appraisal of the rural economy in Denbighshire, looking primarily at supply and demand for employment premises. It did exclude the settlements of Rhyl, Prestatyn, Meliden and Dyserth. The research suggested that some of the allocated employment sites are unlikely to be delivered due to marginal viability. This would have to be substantiated by further viability testing on individual sites.
- 2.5.9 Reflecting the requirements of Planning Policy Wales and Technical Advice Note 23 it is recommended that the Council considers where viability might be of concern the methods of addressing financial gaps. In the absence of gap funding options one method of boosting values could be to secure an element of higher value mixed-use development as an (ancillary) part of a larger scheme. In this context, higher value uses means retail options primarily aimed at meeting local business needs. In addition to boosting development value a well serviced

business park will be more attractive to potential occupiers than one which offers nothing but land and property.

- 2.5.10 The Council will consider the Study's recommendation when reviewing individual site allocations and inviting members of the public to submit candidate site with a greater emphasis on viability from the start of the process.

Denbighshire: Growth Sector Infrastructure Study (August 2016)

- 2.5.11 The Growth Sector Infrastructure Study looked in detail on premises at St Asaph Business Park by focussing on representatives operating in the advanced manufacturing sector, biotechnology and life-sciences sectors. Its objective was to ascertain the correct land requirements for the chosen growth sectors and to develop a more detailed understanding of the nature of demand for accommodation including the quantity and size of accommodation needed for indigenous growth incubator companies and potential locator companies.

- 2.5.12 Key findings of the study point out that many of the existing businesses are broadly content with the quality and suitability of the premises. Some businesses were however reviewing their property needs or were likely to be doing so in the very near future. A key issue for them was the limited availability of additional storage and distribution facilities to complement their laboratory and light manufacturing space.

- 2.5.13 The premises available on St Asaph Business Park are predominantly office space. This type is relatively expensive to re-configure and use for light manufacturing or storage purposes. It is therefore limiting the attraction of St Asaph Business Park to tech businesses that need more flexible space. Study participants were also of the opinion that the site is also held back by poor public transport services, very poor mobile phone coverage, a limited leisure offer and poor visibility/signage.

Regional Employment Land Strategy for North Wales - Strategy Document (June 2014)

- 2.5.14 The strategy builds upon the short term priorities identified in the 'North Wales Economic Ambition: A Strategy for Change' which recognises Inward Investment and Enterprise as two key economic drivers. Central to this is a need to understand the role and function of strategic employment sites across the region and planning clear investment priorities to ensure adequate supply of strategic employment land over the strategy period.

- 2.5.15 The document has identified a number of strategic sites across North Wales that offer potential for key sector investment in the short, medium and long term. There are two regionally-important employment land sites in Denbighshire: Bodelwyddan Key Strategic Site and St Asaph Business Park. Both are predestined for a focus on advanced manufacturing, building on the existing investment in the Optoelectronics / photonics industry at St Asaph.

2.5.16 Besides identifying strategic sites, the report sets out a number of recommendations that can support the delivery of individual sites and create the business environment required for growth. It is recommended that all North Wales local planning authorities should include within the local development plans sufficiently flexible policies in order to support new strategic employment land coming forward should it be considered essential to support a programme or a potential investor with specific site requirements.

A Growth Vision for the Economy of North Wales (July 2016)

2.5.17 This is a single, joined-up vision for economic and employment growth for North Wales; based on a number of local strategies and programmes aiming for economic growth and infrastructure improvements at different locations in the region. It stresses the importance of collaboration and partnership in achieving its aims as set out in the vision:

- To improve the economic, social, environmental, and cultural wellbeing of North Wales;
- To support and retain young people in the region's communities;
- To address worklessness and inactivity across the region;
- To support and enable private sector investment in the region to boost economic productivity and to improve the economic and employment performance of North Wales.

2.5.18 Coordinated by the North Wales Economic Ambition Board, the Vision is supported by Denbighshire County Council as well as the other five local authorities, regionally-important higher education institutes and the North Wales Business Council.

2.5.19 The document identifies three high value economic clusters that are likely to benefit from further funding programmes and could form part of a Growth Deal proposal with the United Kingdom and Welsh Governments.

- (1) The *energy cluster* will have expertise around energy generation, low carbon technologies and processes, with businesses well-equipped to exploit opportunities as a result of investment in Wylfa Newydd, Trawsfynydd Small Modular Reactors and off-shore wind, biomass and tidal energy projects.
- (2) Anchor companies in the *advanced manufacturing cluster* will be supplied by SME's within the region with a reputation for high quality. Growth will be driven in particular by Enterprise Zones (such as Deeside Enterprise Zone), as well as new investment in the Northern Gateway, Deeside; St. Asaph Business Park; Parc Bryn Cegin, Bangor and Parc Cybi, Holyhead.
- (3) The *digital cluster* will be the engine room for growth in North Wales, building on the competitive advantages in terms of academia, quality of life and outstanding natural beauty, and a quality infrastructure. Creative industries, software development, health technology and financial science will all be part of such a cluster, building their own momentum for growth.

2.5.20 The forecasted growth rate for the regional economy is 1.9% between 2016 and 2035 – based on current trends – and the value of the economy would increase by 56% in less than 20 years. It is also estimated that such growth levels will generate at least an additional 120,000 new employment opportunities. Such levels of growth will not only impact on the local infrastructure but have also implications for additional residential site allocations to be included in the forthcoming Local Development Plans.

2.5.21 Having set out a strong growth vision for the area, key partners have agreed to pursue the establishment of a new regional body that is equipped with new responsibilities and powers on key decisions that affect the region. Besides carrying out the functions of a regional transport authority and a business support and trade team, the newly-formed body could also incorporate strategic land use planning. It is argued that the process of identifying the supply of land required for housing and economic growth could be done better regionally and strategically, as well as identifying strategic sites.

Denbighshire Retail Study 2013: Retail Capacity (June 2013)

2.5.22 The study was produced by the Corporate Research Department of Conwy County Borough Council (CCBC) together with the Planning Policy Service in Denbighshire to provide an update on the retail requirements put forward by Roger Tym and Partners in 2003 and 2006. It took into account population changes, estimated population growth generated through residential development as set out in the LDP and already approved retail developments.

2.5.23 All calculations and recommendations contained in the document are based on the assumption that the LDP population growth is realised and tourism growth continues at its 2013-level. It was conclusively indicated that there is likely to be a modest increase in convenience and comparison capacity in the County in the long term.

2.5.24 Whilst a number of retail developments were granted planning permission under the current Local Development Plan, the LDP has not delivered the anticipated number of dwellings since Plan adoption. Population growth remains well behind the 2011 Welsh Government population projections that were used to determine the LDP requirements.

2.5.25 Those divergent trends have led to the commissioning of a new retail capacity study that provides an overview for 2018. Depending on the findings contained in the document, the Council may have to revise the retail hierarchy and consider further land allocations in the forthcoming LDP.

Denbighshire Destination Management 2013 – 2017

2.5.26 Derived from the provisions of the 'Partnership for Growth: The Welsh Government Strategy for Tourism 2013 – 2020', the Council aims to develop a

thriving visitor economy in Denbighshire which celebrates the unique strengths of the place, supports jobs, generates business opportunities and improves the range and qualities of amenities available for visitors and local people whilst including safeguards for sustaining the local environment.

2.5.27 A Destination Management Plan is a shared statement of intent to manage a destination over a stated period of time, articulating the roles of different stakeholders and identifying clear actions that they will take. Hence the document sets out five priorities:

- Create an effective model to ensure a coordinated approach to destination management;
- Ensure Town and Area Plans connect with the Destination Management Plan;
- Make destination management relevant to the business community;
- Audit our tourism product to set baseline data;
- Promote Denbighshire through the North East Wales brand to the business community; and
- Develop a coordinated approach to events that feeds into Denbighshire County Council's Events Strategy 2014-2020.

2.6 **Adjacent Local Planning Authorities**

2.6.1 Whilst the Local Development Plan is concerned with Denbighshire, the policies and land allocations contained in adjacent LPAs' local plans have the potential to impact on the County. It is therefore essential that they are considered during the development of the replacement Denbighshire Local Development Plan.

2.6.2 *Snowdonia National Park* – Snowdonia National Park Authority is currently in the process of reviewing the Eryri Local Development Plan. Having regard to the development strategy and economic ambitions, it is acknowledged that most employment opportunities have been from adventure tourism and this is likely to continue with more emphasis placed on health and well-being services. Hosting the Snowdonia Enterprise Zone, two sites are allocated in the LDP, will create further employment opportunities and assist in replacing those lost from previous activities on the sites.

2.6.3 The LPA's evidence on retail has shown that vacancy rates are increasing and that alternative uses may be desirable for vacant premises in the Service Centres and Service Settlements. There are two settlements where Denbighshire residents are likely to drive for shopping - Y Bala and Betws y Coed (prevailing tourism based retail core). It is noted that Bala has been identified as a location for a supermarket as it is one of the most suitable and sustainable location and accessible by most means of transport in the eastern part of Snowdonia National Park.

2.6.4 *Conwy County Borough Council* – Similar to Denbighshire, Conwy is in the process of reviewing its Local Development Plan that was adopted in October 2013. The local plan identified the following employment land requirements with regard to sustained economic growth: There is a need for a maximum of up to approximately

20.5 hectares, with a contingency level of up to 22.5 hectares of employment land to meet the population change predictions. To contribute to the reduction in out-commuting levels, a further 15.5 hectares of employment land, with a contingency level up to 17 hectares will be accommodated. The strategic hub of Conwy, Llandudno Junction, Colwyn Bay and the accessible and sustainable location of Abergele will be utilised in meeting this need.

- 2.6.5 The Conwy LDP acknowledges that the regional centre of Llandudno and other important town centres within the Plan area experience pressure from non-retail uses. There is a need to maintain and, where appropriate, enhance Llandudno as the retail centre for the region, promote the regeneration of Colwyn Bay, as well as other retail centres and, where possible, enhance the overall vitality, attractiveness and viability of the centres through a more diverse shopping experience.
- 2.6.6 Analogous to the Denbighshire visitor economy, the tourism sector results in an increase in unemployment over the winter months in Conwy. There is a need to encourage and, where possible, safeguard the tourism sector, particularly in the coastal resorts, and exploit tourism potential, especially relating to the natural and built environment, in order to encourage all year round tourism.
- 2.6.7 *Flintshire Council* – Flintshire Council is in the process of completing the Strategic Options (Growth and Spatial Options) stage of its emerging Local Development Plan. Produced in 2015, the LDP topic paper on economic development recognises the County's role as a key focal point for the wider regional economy of North Wales and the Northwest of England, providing for example, 'high value' manufacturing employment at Deeside Industrial Park and Broughton.
- 2.6.8 The Council also acknowledges that in previous development plans it has become practice to over-allocate employment land in order to provide for a range of employment sites by location, size and type to allow for a degree of flexibility. A robust review of existing sites is needed alongside an assessment of the amount and the type of sites likely to be required over the Plan period, in order to determine whether existing sites are still capable of meeting the needs of modern employers.
- 2.6.9 It is envisaged that the emerging LDP will promote town centres as the principal location for new retail, office, leisure, health and other related development, based on a sequential approach to the selection of sites. The LDP is also going to focus development into existing town centres to generate greater choice in facilities and create more reasons why people should visit these centres.
- 2.6.10 *Wrexham County Borough Council* – The local planning authority produced a number of topic papers that support the production of the Deposit LDP, which will be subject to public consultation in Autumn 2017. The LDP growth option proposed by the Council results in a housing requirement of 10,650 dwellings over the LDP period (2013 -2028). In terms of economic impact the proposed growth

option would equate to a jobs growth of some 7,550 over the LDP period, and a resultant employment land requirement of approximately 52.9 hectares.

- 2.6.11 It is argued with regard to the Council's preferred Strategy and Growth Option to discuss proposals for key strategic sites including an area of search for an employment site at Wrexham Industrial Estate. While sites that do not have a reasonable prospect of being used for economic development can be deallocated, the LDP needs to safeguard suitable existing employment sites/allocations.
- 2.6.12 Once published, the Wrexham Deposit LPD will set out a clear strategy for retail development and a framework for the future of town, district and village centres. Similar to the settlement hierarchy, the existing hierarchy of centres and their function for surrounding areas will be established with clearly identifiable roles. Actions need to be developed to respond to the pressure and opportunities resulting from substantial changes to the sector. Retail is going to underpin town centres but policies should encourage a diversity of uses in centres. Mixed-use developments of retail, entertainment, restaurants and housing are encouraged.
- 2.6.13 *Powys Council* – Powys' Local Development Plan was subject to examination by an independent Planning Inspector in Spring 2017. Changes occurring during the examination process are likely to be consulted on in Summer 2017. Proposals contained in the emerging local plan are unlikely to have an impact on Denbighshire because of the topography and landscape designations along the Counties' boundary, for example Area of Outstanding Natural Beauty and two European protected sites for nature conservation.
- 2.6.14 *Gwynedd Council* – Gwynedd Council and the Isle of Anglesey County Council have decided to prepare a Joint Local Development Plan for Anglesey and the Gwynedd Local Planning Authority Area. Both Councils anticipate adopting the Plan in July 2017. The Plan strategy broadly expects the anticipated transformational economic change arising from the unique scale of major infrastructure projects on the Isle of Anglesey and the Island's Enterprise Zone status will be the biggest driver of spatial and social change over the Plan (2011 - 2026).
- 2.6.15 It is stated that the assignment of Enterprise Zone status to the island of Anglesey complements the existing Anglesey Energy Island Programme. Nine key sites on the Island have been identified in respect of being subject to focussed support. The Welsh Government has also identified the Snowdonia Enterprise Zone, which, although located in the Snowdonia National Park, could help spread prosperity beyond the Park's administrative boundaries.
- 2.6.16 Whilst not within the immediate vicinity of the County border, regionally important developments in Gwynedd and on the Isle of Anglesey are likely to have an impact on the local economy in Denbighshire. There is an opportunity to benefit from an increased number of SMEs that are going to operate within the economic environment created around those employment 'hubs'.

2.6.17 The LDP's Settlement Strategy recognises that city and town centres are vital elements of the local economy and they continue to provide a focal point for communities. It is therefore important to ensure that there is a planning framework which safeguard and enhance the position of town centres as locations for retail and commercial services. A retail study undertaken in 2013 highlighted the strong influence of Bangor as a sub-regional retail centre. It also recognised that the area is serviced by a retail hierarchy which includes centres outside the Plan area, for example Llandudno and Chester.

3. Baseline Review

3.1 Introduction

3.1.1 Whilst the previous section focussed on policy and strategic documents, the purpose of the following paragraphs is to analyse any changes that have taken place in the County since the Denbighshire Local Development Plan was adopted in June 2013. Both sections will provide crucial evidence for the forthcoming stages of Plan production, when the Council is going to discuss proposed changes in greater detail.

3.1.2 The baseline information has been split into separate topics such as, employment land allocations and retail, for an easy reference and improved user-friendliness.

3.2 North Wales Coast Strategic Regeneration Area

3.2.1 The Denbighshire Local Development Plan 2006 – 2021 (LDP) contains local policy PSE1 which was included to support development proposals aiming to address deprivation and offering wider economic benefits for local communities within the framework of Welsh Government's (WG's) North Wales Coast Strategic Regeneration Area (NWCSRA) programme.

3.2.2 The Welsh Government's 'North Wales Coast Strategic Regeneration Area' funding programme finished in March 2014¹ but the previously identified problems and disadvantages are still prevalent in the area. It is the overall aim of the adopted LDP to address matters such as supporting economic diversity within our town centres and the provision of high quality houses.

3.2.3 Whilst the original funding programme does not exist anymore, the principal objectives that were underlining the former NWCSRA are mirrored in Denbighshire County Council corporate documents and strategies, for example the Corporate Plan 2012 – 2017 and the Economic and Community Ambition Strategy 2013 – 2023. Both documents express the need for employment generating activities, high quality houses for members of the local community, support for tourism, and addressing deprivation in the County. The general thrust and aim of local policy PSE1 is therefore still relevant.

¹ (Link: <http://gov.wales/topics/housing-and-regeneration/regeneration/strategicareas/northwalescoast/?lang=en>)

- 3.2.4 Unlike the WG programme, Denbighshire’s corporate documents are not confined to the North Wales Coast area but cover the entire County. They positively extend beyond the spatial limitations of PSE 1, i.e. the A55 corridor and the coastal area. If prospective applicants wish to refer to local policy PSE1 in order to support their planning proposal the Council would encourage them to demonstrate how the development will support individual strategies and action programmes outlined in the Council’s corporate documents.
- 3.2.5 There is an opportunity to consider the thrust and wording of local policy PSE 1 as part of the LDP revision process; to reflect above changes and reduce the dependency on a specific WG regeneration programme.

3.3 Local economy

Economic Overview

- 3.3.1 There are approximately 94,700 people living in Denbighshire in 2015, the area of which is 844 square kilometres. This has been an increase of about 770 people since 2011. The population density is 112 people per sq.km but the distribution differs significantly within the county with an urbanised coastal strip around the seaside towns of Prestatyn and Rhyl, and a predominantly inland rural area with a number of locally important market towns and main villages south of the A55 transport corridor.
- 3.3.2 About 55,500 of the 94,700 residents (or 58.6%) were of working age (aged 16yrs to 64yrs) in the County. The percentage of 58.6% is lower than the 61.9% for Wales, and well below the 63.3% for Great Britain. Model based unemployment in Denbighshire was estimated at 4.6% or 1,900 people in the year to December 2016. This includes a wider range of people than the narrower Job Seekers Allowance figures, which have been affected in the last few years by the gradual introduction of Universal Credit. Unemployment in the County continued to rise after the financial crisis into the year ending December 2013, but has fallen in each period since then.

3.3.3 Table 2 Unemployment rate (model based)

	2009	2010	2011	2012	2013	2014	2015	2016
Denbighshire	7.2	8.4	7.4	7.3	7.8	6.4	5.2	4.2
Wales	8.2	8.3	8.3	8.3	7.9	6.8	5.9	4.6

Source: Unemployment Rate 2009-2016; Nomis, © Crown Copyright

- 3.3.4 The number of active businesses in Denbighshire in 2015 (the most recent measurement point) was 3,330 businesses; this is an increase of 80 active businesses on the previous year and 175 businesses since 2006 (see table 3). The year-on-year changes since 2006 tell a story of the challenging economic circumstances that were in operation at the time. There was an increase in businesses up until 2008 before decreases thereafter. The increase witnessed in

2013 was the first increase since 2008 and could potentially signal an improved economic landscape.

3.3.5 Table 3 Number of Active Businesses in Denbighshire (2006 – 2015)

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Total	3155	3225	3320	3260	3195	3135	3115	3195	3250	3330

Source: Statistics Wales, © Crown Copyright

3.3.6 Gross Value Added (GVA) measures the size of the economy of an area at NUTS3 level. This is a European Union unit of geography that represents small groups of local authorities. Local authority figures have been estimated by assuming they are the same as the figures for the NUTS3 area level. This is the reason why Conwy and Denbighshire are grouped and have the same GVA per head. In 2015, which is the most recently available measurement point the GVA per head in Denbighshire was £15,978 per annum (see table 4). This is an increase of £2,390 from 2006 figures. However, GVA should always be treated with caution as they can be distorted by commuting flows between local authorities and across the Welsh-English border.

3.3.7 Table 4 Gross Value Added per Head in Denbighshire (2006 – 2015)

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
GVA per head	13,588	13,933	14,294	13,709	13,636	14,063	14,917	15,217	15,278	15,978

Source: Statistics Wales, © Crown Copyright

3.3.8 Each industry is coded in accordance with the 1992 Standard Industrial Classification. The type of work done by an employee defines the occupation group and what an enterprise does defines the industry. The two most dominant industries regarding employment in Denbighshire are Retail/ car repair (6,000 people) services and the health sector (10,000 people) (see table 5). The dominance of the health sector is further underlined when comparing the % of employee by industry in Denbighshire (27) with the figures for Wales (16.2) and Great Britain (13.3).

3.3.9 Table 5 Employee jobs by industry in Denbighshire (2015)

Employee Jobs by Industry	Denbighshire (total number)	Denbighshire (%)	Wales (%)	Great Britain (%)
Mining And Quarrying	0	0.0	0.1	0.2
Manufacturing	3,500	9.5	12.0	8.3
Electricity, Gas, Steam And Air Conditioning Supply	75	0.2	0.9	0.4
Water Supply; Sewerage, Waste Management And Remediation Activities	225	0.6	1.1	0.7
Construction	2,000	5.4	4.2	4.6

Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	6,000	16.2	15.9	15.8
Transportation And Storage	1,000	2.7	3.6	4.7
Accommodation And Food Service Activities	3,500	9.5	7.6	7.2
Information And Communication	300	0.8	1.7	4.2
Financial And Insurance Activities	400	1.1	2.3	3.6
Real Estate Activities	600	1.6	1.2	1.7
Professional, Scientific And Technical Activities	1,750	4.7	5.1	8.4
Administrative And Support Service Activities	1,500	4.1	6.4	8.9
Public Administration And Defence; Compulsory Social Security	1,750	4.7	7.1	4.4
Education	3,500	9.5	10.4	9.2
Human Health And Social Work Activities	10,000	27.0	16.2	13.3
Arts, Entertainment And Recreation	600	1.6	2.7	2.4
Other Service Activities	600	1.6	1.5	2.0

Source: ONS Business Register and Employment Survey; © Crown Copyright

Deprivation

3.3.10 The Welsh Index of Multiple Deprivation (WIMD) measures relative deprivation across a range of themes such as income, health, access to services, community safety, employment, etc. This information is based on the Lower Super Output Areas (LSOAs) that cover the whole of Wales. There are a total of 1,909 LSOAs. An area is classified as deprived if it has a concentration of people experience any of those forms of deprivation.

3.3.11 Table 6 Number of Denbighshire LSOAs in top 10% (190 in total) most deprived in Wales, by deprivation domain

Deprivation Domain	Number	As % of all LSOAs
Income	8	13.8%
Employment	7	12.1%
Health	6	10.3%
Education	5	8.6%
Access to services	8	13.8%
Community Safety	8	13.8%
Physical environment	1	1.7%

Housing	8	13.8%
Overall Index	8	13.8%

Source: Conwy and Denbighshire Public Services Board

3.3.12 Multiple Deprivation in West and South West Rhyl is among the highest in Wales and includes unemployment, low incomes, and poor educational outcomes amongst other things. Other parts of Rhyl, notably the South and East are less deprived and more prosperous. In addition to the historic decline of the tourism industry, Rhyl has suffered from a declining town centre retail offer in recent years. Recent investments have focused on physical regeneration and also the development of Rhyl High School. Parts of Upper Denbigh / Henllan suffer also from multiple deprivation and are included in the North Denbighshire Communities First area. There are high levels of unemployment, low household incomes and poor health and education outcomes. The LDP will continue to support regeneration activities, corporate strategies and planning matters aiming to tackle deprivation in the County.

Employment Land

3.3.13 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. This 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). Table 7 lists all the new employment land allocations in Lower Growth Towns. Much of the commercial demand for employment land was focussed in the northern part of the County, in particular the A55 corridor because of proximity to:

- quick access to the motorway network in the northwest of England and to the enterprise zone at Deeside;
- Trans- European Network
- major centres of population in the County and along the North Wales coast;
- existing employment sites, for example, St Asaph Business Park;
- the regional hospital ‘Ysbyty Glan Clwyd’ in Bodelwyddan; and
- the North Wales coast main railway line providing links to Manchester, London and Cardiff.

3.3.14 Table 7 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
Prestatyn	--	0	

			vacant or underused premises on existing sites
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

- 3.3.15 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.
- 3.3.16 The Local Development Plan recognises that traditional rural buildings make an important contribution to the quality of the landscape in Denbighshire and securing new uses for buildings that have become redundant can help to preserve them. Local policy PSE 4 seeks to ensure that reuse for employment use will always be the first priority in line with national guidance. A key priority is the need to sustain rural employment throughout the County. The policy requires the demonstration of a business case for development, in order to establish the benefits of the scheme in relation to sustaining local employment and the rural economy. The benefits include provision of local employment opportunities, use of locally sustainable sources for any raw materials, scope to sell local produce, and provision of services to local communities.
- 3.3.17 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 relate to land allocations that are shown on the LDP Proposals Maps. The survey focuses on 31 employment sites; referring to land allocations contained in the LDP under LDP Policy PSE2, BSC2, and BSC5. It hence

measures changes relating to business premises on sites that were already contained in previous land use plans.

3.3.18 Table 8 Land take up per LDP policy 2006 – 2016

LDP policy	2008	2009	2010	2011	2012	2013	2014	2015	2016
PSE 2	5.2	4.4	9.1	0.0	3.3	0.0	7.95	0.00	tbc
BSC 2	0.0	0.0	1.4	0.0	0.0	0.1	0.00	0.00	0.0
BSC 5	0.0	0.0	0.0	0.0	0.0	0.0	0.00	0.00	0.0

3.3.19 Land take up has been rather slow in the last five years, with the exception of 2014, due to the number of vacant offices and industrial units available in Denbighshire. I.e. the existing stock can satisfy demand from businesses without translating demand into new land requirements.

3.3.20 Table 9 Completions per LDP policy 2007 – 2016

LDP policy	2008	2009	2010	2011	2012	2013	2014	2015	2016
PSE 2	4.8	9.5	0.0	0.0	0.2	1.9	0.00	0.8	tbc
BSC 2	0.0	0.0	0.0	0.3	0.0	0.0	2.89	0.0	0.0
BSC 5	0.0	0.0	0.0	0.0	0.0	0.0	0.00	0.0	0.0

3.3.21 Reflecting on the low land take up rates as shown in table 9, the amount of completed employment land has been very low over the last nine years. There is however an indication that annual completion rates might rise based on 2014 figures.

3.3.22 Employment land delivery crucially depends on the viability of the proposed development and the potential value of land for alternative uses. The Council has been 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.

3.3.23 Confirming the results of the 'Denbighshire: Growth Sector Infrastructure Study (August 2016)' (see paragraphs 2.5.11 – 2.5.13), the Council regularly receives business enquires that would require changes to the B1 and B2 Use Class restrictions on parts of St Asaph Business Park. [Further information on land uses falling into the B Use Classes can be found in the Town and Country Planning (Use Classes) Order 1987 (as amended) for Wales.] Since St Asaph Business Park has been identified as strategic employment site for a multitude of economic activities, there is a need to review the wording of local policy PSE 2 regarding scope to accommodate future demand for alternative use within the B Use Classes.

3.3.24 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 will 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.

3.4 **Retail economy**

3.4.1 Retail plays an important economic role within the County; being one of the largest employers of people locally. The majority of retail facilities is located in the eight main settlements: Rhyl, Prestatyn, Rhuddlan, St Asaph, Denbigh, Ruthin, Corwen and Llangollen. Small-scale retail is also supported in the villages which can play a vital economic and social role to their local communities.

3.4.2 Although historically focussing on retail it has been acknowledged that town centres fulfil a multitude of functions not only for residents but day-visitors and holiday-makers alike. Planning Policy Wales (PPW) encourages local planning authorities to focus on town centre diversification with retailing remaining a principal function. They are considered to be the most sustainable locations for new retail development because town centres can be accessed by a larger number of people using public transport.

3.4.3 PPW seeks to reinforce town centres as the most appropriate location for new retail development, whilst recognising the important role that small scale retail development in rural areas can play. It requires developers to satisfied the three tests for retail proposals: (1) retail need – quantitative and/ or qualitative; (2) sequential approach to site selection; and (3) retail impact assessment. The purpose is to demonstrate that it will not have a detrimental impact on the health of existing town and city centres.

3.4.4 Roger Tym & Partners provided the Council with a Denbighshire Retail & Leisure Study in 2003 which was updated in 2006 and included forecasts of floorspace requirements for both the comparison and convenience retail sectors up to 2011. The recommendations outlined in the document were a source for informing the production of local policy and the retail hierarchy.

3.4.5 National policy (PPW Edition 9 – paragraph 10.2.3) requires local development plans to establish a hierarchy of town centres, which is set out in table 10 for Denbighshire as included in the LDP. The County's retail hierarchy was established to identify the strategic role to be performed by the main centre. The aim was to direct large scale retail development towards Rhyl. The town also functions as a tourist resort, and whilst its importance has declined in recent years this role will further be reinforced through redevelopment of its marine quarter around the harbour.

3.4.6 Other town centres within Denbighshire were considered to be of local importance, although Prestatyn and Llangollen have a strategic role in terms of

tourism, of which retail can play a part. The Local Development Plan aims to support the tourism role that Prestatyn and Llangollen play by encouraging the development of tourism related retail and niche retail.

3.4.7 Table 10 Retail Hierarchy in Denbighshire (local policy PSE 6)

Position	Type of Centre	Settlement
Sub-Regional Centre	Rhyl provides a wide range of facilities and services that fulfil a function as a focus for both the local community and public transport services. The centre serves a sub-regional catchment area which the LDP aims to enhance.	Rhyl
Town Centres	Provides a range of facilities and services that fulfil a function as a focus for both the local community and public transport services.	Prestatyn, Ruthin, Llangollen, Denbigh
District Centres	Groups of shops usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants.	St Asaph, Corwen, Rhuddlan
Local Centres	Small grouping usually comprising a newsagent, a general grocery store, a sub-post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.	Villages and Hamlets

3.4.8 A further retail capacity study was commissioned in 2013 to take into account the population change and new retail developments as outlined in the Deposit Local Development Plan. Whilst providing a comprehensive update the 2013 document did not take account of the largest change in the retail development of the County – ‘Parc Prestatyn’ shopping park which includes a number of national retail-chains such as, Tesco, M&S, Next, SportDirect and River Island. This development has greatly increased the attractiveness of the town as a retail centre, but at the same time has seen the closure of some key anchor retailers in Rhyl.

3.4.9 Since Plan adoption, retail development, primarily convenience, has also taken place at the former ‘Station Yard’ site in Denbigh, on the former print-works in Llangollen, at the ‘Rhuddlan Triangle’ site and the former ‘Gas Works’ site in central Prestatyn. Development is under construction on land that was either allocated under local policy PSE 7 ‘Proposals for new retail development’ or BSC 2 ‘Brownfield development priority.

3.4.10 There are a number of out-of-town centre retail developments that provide an important contribution to the County’s overall retail offer, for example Tweedmill Factory outlet and Clwyd Retail Park. The LDP did not contain any proposal for further expansion due to the potential impact on the town and city centres of Rhyl, Rhuddlan and St Asaph. Nevertheless, the Tweedmill Factory outlet has sought

some improvements to the existing premises and, hence, diversified the retail offer within its existing space.

3.4.11 The Council is currently in the process of commissioning a new study to understand the effects of the new developments on the retail hierarchy, the local sector and any demand for further land allocations. This information is going to be used to inform future local policy in the County.

3.4.12 The Council undertakes regular surveys of the main town centres, identifying vacancy rates and nature of use (see chart 1 below and table 11). This information is useful because it gives an indication of the health of the town and the level of retail uses within the town.

Chart 1 Denbighshire Town Centre Vacancy Rates (2006 – 2016)

3.4.13

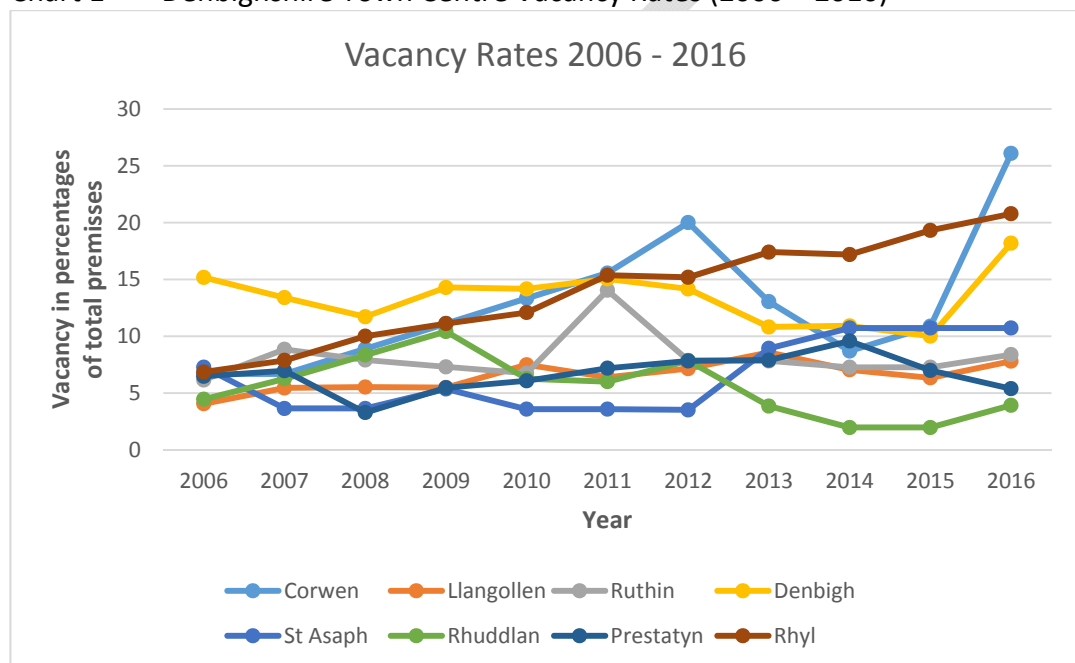


Table 11: Summary of annual Town and City Centre survey results

Town Centre	Comparison Outlets		Convenience Outlets		Other Outlets		Residential Units		Service Outlets		Vacant Outlets		Total Units
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
Corwen	10	21.7	6	13.0	3	6.5	4	8.7	11	12.0	12	26.1	46
Llangollen	36	25.5	10	7.1	19	13.5	24	17.0	41	29.1	11	7.8	141
Ruthin	47	26.3	12	6.7	13	7.3	46	25.7	46	25.7	15	8.4	179
Denbigh	27	24.5	7	6.4	9	8.2	11	10.0	36	32.7	20	18.2	110
St Asaph	4	7.1	5	8.9	8	14.3	15	26.8	18	32.1	6	10.7	56
Rhuddlan	11	21.6	1	2.0	7	13.7	6	11.8	24	47.1	2	3.9	51
Prestatyn	56	30.1	15	8.1	21	11.3	8	4.3	76	40.9	10	5.4	186
Rhyl	115	29.9	20	5.2	31	8.1	27	7.0	112	29.1	80	20.8	385

Source: Denbighshire County Council, November 2016

3.5 **Visitor economy**

- 3.5.1 Denbighshire has a diverse tourism offer from the coastal resorts of Rhyl and Prestatyn to the wealth of attractive market towns in the Vale of Clwyd; set within a high quality environment and a growing reputation in the outdoor activity sector. High quality development proposals that support and enhance the visitor economy of the County will be supported and encouraged by the Council.
- 3.5.2 Tourism plays an important part in Denbighshire's economy. It currently accounts for 10% of employment in Denbighshire. This represents approximately 5,000 jobs, although many of the jobs in this sector tend to be seasonal and lower paid. Overall revenue generated from tourism for Denbighshire in 2014 was nearly £428 million with over 5 million people visiting the County that year.
- 3.5.3 The coastal resorts of Rhyl and Prestatyn have long been dominated by the visitor economy, traditionally attracting large numbers of both staying and day visitors. Both have largely failed to respond to the changes in the visitor market and have remained over dependant on long family holidays and having limited appeal to those seeking new types of visitor experience. It is essential that these towns position themselves to attract new and growing tourism markets in the future.
- 3.5.4 On-going initiatives to regenerate Rhyl are beginning to have significant effects in terms of improving the natural and built environment and this will ultimately lead to increased economic prosperity. The local plan therefore aims to restrict land uses in the coastal tourism protection areas to those relating to the visitor economy in order to complement the regeneration aims for the area.
- 3.5.5 The outdoor activity sector is one that has significant potential to grow within Denbighshire. There is an area of outdoor activity specialism building up around the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty, Llandegla area – based on the mountain bike and shooting centres across the County; to the Hiraethog Moors and Llyn Brenig areas. Expenditure by participants in outdoor activities is often high and the Local Development Plan is supportive of developments that will encourage sustainable growth in this sector within environmental capacity limits.
- 3.5.6 Static and touring caravan sites together with chalets and camp sites are an important source of holiday accommodation, which can be crucial to the success of the tourism industry, although such sites are often seen as being visually intrusive. This is particularly felt in the main resort areas of Rhyl and Prestatyn where a series of adjoining sites are prominent and in various countryside locations. In some areas the cumulative impact of existing sites may be considered visually obtrusive and dominant in the landscape therefore the Council will encourage landscaping schemes to improve and screen sites.
- 3.5.6 Local policy PSE 12 seeks to ensure that future development is permitted only where the proposal would not result in an over concentration of similar uses in the

locality and where there is significant enhancement of the biodiversity of the area. The occupancy of static caravans and chalets will be restricted to holiday use and any residential use will be subject to enforcement action.

3.5.7 There is already an over provision of caravan type development in the north of the County much of which is of low quality. Much of the coastal area is exposed with little tree cover which makes the assimilation of caravan sites into the landscape difficult. In the inland rural areas, caravan development, particularly static caravans, can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled.

3.5.8 Touring caravan sites and camp sites have a lower impact as they are not permanently occupied and in winter months there may be little evidence of activity. However in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled. Where visitor pressures are less they may be permissible, subject to other environmental considerations.

3.6 Minerals

3.6.1 The use of minerals contributes towards the economy of Wales; however, the extraction of minerals can impact upon local communities and the environment. Minerals are a finite resource and can only be worked where they occur, presenting particular challenges in Denbighshire due to the distribution of mineral and its coincidence with the Area of Outstanding Natural Beauty (AONB). The local planning authority will therefore seek to reduce the need for minerals through sustainable construction practices, and to maximise the use of recycled aggregates in preference to primary aggregates.

3.6.2 Planning Policy Wales Chapter 14, Minerals Technical Advice Note 1: Aggregates, and Minerals Technical Advice Note 2: Coal, provide national guidance to local planning authorities, which place the following requirements on local planning authorities:

- Provide mineral resources to meet society's needs and to safeguard resources from sterilisation;
- Identify areas where coal should not be worked;
- Protect areas of importance to natural or built heritage;
- Limit the environmental impact of mineral extraction;
- Identify buffer zones around existing mineral workings to avoid conflicting land uses being co-located;
- Achieve high standard restoration and beneficial after use; and
- Encourage efficient and appropriate use of minerals and the re-use and recycling of suitable materials.

3.6.3 A key requirement of the Minerals Technical Advice Note 1: Aggregates is the production of a Regional Technical Statement, which breaks down the requirements of national policy and translates it at the regional and local level. The

key output of the 2009 document was the apportionment of primary aggregates across the region based upon likely demand trends on the region. The apportionments are triggered by the need to make provisions to supply rock for 15 years and sand/gravel for 12 years. The RTS identified a relatively modest requirement of additional sand and gravel to be identified in Denbighshire.

- 3.6.4 Since the adoption of the LDP the Regional Aggregate Working Party have published the RTS Review (2014) which sets out the need for aggregates over a 25 year period. Welsh Government published a policy clarification letter, CL-05-14 in 2014 which advises that where landbanks of 25 years of aggregates exist new allocations will not be necessary. The RTS Review (2014) recommendations are made upon this basis and identify a greater allocation for sand and gravel of 2.2 million tonnes, as well as a need to allocate 0.8 million tonnes for crushed rock.
- 3.6.5 To meet the need identified by the RTS the LDP identified preferred areas for sand and gravel extraction. Despite this, no applications for sand and gravel extraction have been submitted and no pre-application enquiries have been submitted either. There remain a limited number of sand and gravel extraction sites within the sub-region, including Maes Mynan in Flintshire near the Denbighshire border which recently secured planning permission for an extension to provide an additional 659,000 tonnes of sand and gravel.
- 3.6.6 Whilst the RTS (2009) recommended that an allocation of 1 million tonnes of sand and gravel was allocated within the Denbighshire Local Development Plan it was considered counterproductive to identify one large site for sand and gravel as sand and gravel workings can be operated on a relatively small scale. Due to the current economic climate the deliverability of one large site was also considered to be questionable. Therefore the local planning authority has agreed to identify preferred areas (as defined within Minerals Planning Policy Wales) where there are known resources with some commercial potential, and where planning permission might reasonably be anticipated. This was intended to provide flexibility to the market, whilst providing a degree of certainty regarding the likely location of future workings. However, no applications for sand and gravel extraction have been submitted and it would therefore appear that the policy is failing to deliver. This policy will therefore need to be reviewed. A small allocation for crushed rock is also identified as required by the RTS Review (2014) and this would need to be taken into account as part of the review of the policy.
- 3.6.7 The Council recognises that there will be a need to ensure the land bank of minerals is maintained. Monitoring of mineral workings within the local authority area will be essential to ensure that land banks remain adequate.
- 3.6.8 The main information source regarding mineral resources in the County are obtained from the British Geological Society (BGS) Mineral Resource Map of Wales. The maps, which cover the whole of Wales, are published at a scale of 1:100,000 and include material of intrinsic economic interest. The information shown on the maps includes mineral resources which are inferred from available

geological information, where levels of confidence regarding the quality, extent and accessibility of the resource are low. Further investigation may therefore be necessary at the planning application stage.

3.6.9 There are a number of sand and gravel deposits across the County, most significantly occurring in the Wheeler Valley, Vale of Clwyd and the Dee Valley. A sieve map approach was used to determine the most appropriate areas. The following areas were excluded:

- *Area of Outstanding Natural Beauty (AONB)* National policy seeks to steer new mineral workings away from the AONB.
- *Agricultural land grade 1 and 2* National policy seeks to steer development away from high quality agricultural land. (Grade 3 has not been excluded because the majority of deposits are within grade 1, 2 and 3. There are no deposits of any significance in lower grade land.);
- *Flood risk areas (C1 and C2)* Sand and gravel development in the flood plain may result in the creation of a water body. The purpose of excluding flood risk areas is to avoid creating water bodies which may be inappropriate in the landscape and to avoid attracting birds which may conflict with the aerodrome safeguarding zone. The creation of water bodies would also result in the permanent loss of agricultural land.; and
- *International/ National designated sites* (for example, Special Areas of Protection and Sites of Specific Scientific Interest) The extraction of sand and gravel would be unacceptable in sensitive areas due to the potential to impact on the reason for designation.

3.6.10 Other factors, such as proximity to dwellings, historic buildings and so on were considered. Any planning application received would also be subject to other policies contained within the Local Development Plan.

3.6.11 The Local Development Plan Preferred Strategy identified that development will predominantly be directed towards the north of the County, therefore, the greatest need for sand and gravel was considered likely to be in the north of the County. Whilst there would be a level of need in the South of the County, this was considered most likely to be met by existing large sand and gravel workings in Wrexham at Borrass Quarry, or by small, farm based operations. The Bodfari/Denbigh area was considered suitable with the most potential in terms of the economics of developing it. It has relatively good access to centres of population and likely users of the material. There are constraints associated with all significant deposits of sand and gravel, visual impact being a constraint associated with the majority of areas. It is considered that this area is the least constrained and therefore offered the most potential for future development and was indicated as a preferred area on the Proposals Map.

3.6.12 There is no forecast of need and no landbank of permitted coal reserves as with aggregates. Local authorities are required to identify those areas where it would not be acceptable for coal to be worked and to identify buffer zones around existing and proposed coal working sites in order to safeguard them.

- 3.6.13 Denbighshire does not have a history of coal working, most likely due to limited resources of limited quality compared with the Flintshire and Denbighshire coalfields in Flintshire and Wrexham respectively. Furthermore, there has been no pressure from the industry to work the coal in Denbighshire.
- 3.6.14 There are two areas of tertiary shallow coal resource in the Prestatyn/Dyserth area and the Trefnant/Henllan area of 753 hectares and 76 hectares respectively. The precise nature of the resources are not known, further investigation would be needed to determine the precise quality, distribution and depth of the coal resources.
- 3.6.15 The coal resource in the Prestatyn/Dyserth area is predominantly located under the existing settlements of Prestatyn, Dyserth and Meliden. There are small areas that are undeveloped; however, their proximity to housing precludes them from development due to the requirement of MTAN 2 to retain a 500m buffer between open cast coal mines and residential development.
- 3.6.16 The coal resource in the Trefnant area is predominantly located in open countryside, although the northern part of the resource is located under the settlement of Trefnant. There are a number of constraints within the area of coal resource which make it unsuitable for extraction, including proximity of residential development, the Coedwigoedd Dyffryn Elwy SAC, Coedwigoedd Ac Ogofau Elwy A Meirch SSSI, Plas Heaton Historic Park, Ancient semi-natural woodland, flood risk and the presence of a major aquifer. Collectively, these preclude the majority of the resource from extraction, making the resource as a whole economically unviable to work.
- 3.6.17 In line with the requirements of Planning Policy Wales, those mineral deposits which society may need within Denbighshire will be safeguarded and protected from development which would sterilise them or hinder future extraction.
- 3.6.18 A judgement was made regarding which minerals should be safeguarded based upon known distribution, extents, and historic and current demand. This was to avoid unnecessarily restricting development whilst ensuring that important minerals are appropriately safeguarded. Table 12 identifies the rationale behind the safeguarding of minerals (excluding coal which has been addressed in the previous paragraphs).

3.6.19 Table 12 Safeguarded minerals in Denbighshire

Mineral	Discussion	Conclusion
Limestone	Relatively large distribution from the Bodelwyddan area in the north past Ruthin in the South. Isolated deposits east of Rhullt. Limestone has been an important mineral in Denbighshire with a	Limestone deposits are safeguarded within the LDP.

	number of quarries remaining in the AONB and a quarry in Denbigh.	
Sand and Gravel	Relatively large distribution of variable quality sand and gravel. There are a large number of small deposits (less than 100m in width). A need to identify an area for sand and gravel extraction has been identified within the RTS. The mineral has been worked in the County with no active quarries, and one undergoing restoration.	Sand and Gravel deposits are safeguarded in the LDP.
Coal	Coal occurs at considerable depth below the Vale of Clwyd. There are no primary of secondary resource blocks identified within Denbighshire, and due to the depth of the coal, little prospect of future opencast workings. The coal is understood to be thin and there is little published information or knowledge on these coals. Surface development does not necessarily sterilise deep mined coal. There is no justification at the present time to safeguard coal resources.	Coal should not be safeguarded within the LDP. However, should further investigation reveal that there are areas of coal which merit safeguarding, the policy should enable these areas to be safeguarded.
Tufa	Distribution is very variable and localised. Found predominantly in Flintshire. None identified in Denbighshire to date.	No known resource, therefore not to be safeguarded within the LDP
Triassic lower mottled sandstone	Deposits of red sandstone underlies the Vale of Clwyd from Rhyl in the north to Pentre Celyn in the South, but demand is very limited and probably confined to building conservation uses. It is not suitable as an aggregate as it is too soft and lacks compressive and tensile strength, but is capable of forming a sand if crushed. Given the availability of overlying sand and gravel deposits, and the absence of demand for a crushed rock derived sand, there is no justification to safeguard this rock.	Not safeguarded within the LDP
Metaliferrous minerals	Known deposits of Carboniferous mineralisation (mainly galena, barytes, calcite spar) have been extensively worked in the 18th/19th and early 20th	Not safeguarded within the LDP

	centuries and economically accessible deposits will have been largely exhausted. Uncharted mineral veins may remain, but would require an extensive geophysical, geochemical and drilling programme to identify quality and extents. As such workings are generally underground at depth, surface development does not necessarily sterilise these deposits.	
Chertstone	There is no national need for this rock type, which used to be used as an industrial abrasive and refractory material. The deposits are not extensive in Denbighshire, occurring in two locations near Prestatyn and Llandegla. Mainly worked in Flintshire in the past. It is considered there are no grounds to safeguard this in Denbighshire in view of limited economic need. A poor aggregate, as it is brittle.	Not safeguarded within the LDP
Silica rock	This is localised degraded Millstone grit of high silica purity. It is not unique, but is still worked near Eryrys. There is little information on where the "degraded" silica rock occurs and therefore the entire millstone grit would have to be safeguarded, which is disproportionate and unnecessary. Prohibition orders have extinguished old planning permission, suggesting no intention to work, and therefore indicative of a lack of economic demand.	Not safeguarded within the LDP
Silurian Shales and Slates	The Silurian shales and slates have been worked historically as a source of local building stone, aggregate, flags and slates. The deposits are generally brittle, soft and lack strength. Some formations can produce a low value aggregate or bulk fill material. These rocks have a very wide occurrence throughout North, Mid and West Wales, forming the bulk of the Cambrian Mountains. Locally, certain beds contain flaggy and coarse slate deposits, and have been of significant importance in Victorian times, with slate mines along the Carrog/River Dee valley,	Not safeguarded within the LDP

	<p>and on Llantysilio, Maesyrychen and Berwyn mountains. The slate industry has declined and workings are confined to two sites focusing mainly reworking slate wastes with a limited output. The published geological maps do not differentiate the occurrence of good horizons of slate. Given the very extensive but generally low quality of the resource across Wales and that the outcrop is mainly in remote and upland areas, it is not considered that this resource would be significantly jeopardised by other development pressures and therefore does not justify safeguarding.</p>	
Silurian Gritstones	<p>A formation of Denbigh Grits is identified as a high polished stone (PSV) aggregate which provides high skid and wear resistance for highways construction. The grits are interbedded with shales and cannot be differentiated until more geological mapping takes place. The main outcrops are within Clocaenog Forest up to the villages of Clawdd Newydd and Betws Gwerfil Goch, and a smaller outcrop between Dyserth and Rhuallt. These grits are also extensive within Conwy and Powys, but due to infrastructure and topography, are more accessible in Denbighshire. Although there are no workings at the present time, given the high specification of the Denbigh. Grits, it is appropriate to safeguard to enable assessments to be made on the impact of other development proposals to prevent inappropriate and unnecessary sterilisation of the resource.</p>	Safeguard within the LDP
Igneous and Volcanic Rock	<p>There are few igneous and volcanic deposits in Denbighshire, occurring only south of Llandrillo on the slopes of the Berwyn Range at the border with Powys. Horizons of volcanic tuffs and igneous micro-gabbro occur within Ordovician shales. These strata often have excellent toughness characteristics, and given the</p>	Safeguard within the LDP

	isolated occurrence should be safeguarded.	
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- 3.6.20 The Regional Technical Statement (RTS) recommended that the Local Development Plan safeguards sand and gravel and rock (especially limestone). Whilst Denbighshire has a range of different mineral types, it was considered appropriate to safeguard economically viable types of mineral, therefore sand and gravel, limestone, Silurian gritstones and igneous and volcanic rock are safeguarded within the Local Development Plan.
- 3.6.21 Whilst there are a number of other minerals located within the County, the decision was taken not to safeguard them in order to keep the proposals maps as simple as possible and ensure that safeguarding is only included where it is necessary to protect the resource from future development. Where the mineral is considered of little value, or extensive in distribution it has not been safeguarded.
- 3.6.22 An exercise was undertaken in order to determine the most appropriate areas of mineral to be safeguarded. The total extents of Limestone, Sand and Gravel, Silurian Gritstones and Igneous and Volcanic rock within Denbighshire were located from the British Geological Survey geology data. Small, isolated deposits of less than 100m in width were removed as their economic viability would be questionable, the impact of extracting the mineral may outweigh the benefit and the likelihood of the mineral actually being there is less (due to the scale at which the maps are produced). A larger threshold was not selected to ensure that small sites serving the local area are captured. This is particularly relevant for sand and gravel where extraction may be undertaken on farms to serve the immediate area.
- 3.6.23 Prior to the adoption of the LDP but after the LDP had been submitted to the Welsh Government, the British Geological Society (BGS) produced an Aggregates Safeguarding Map of Wales. The Inspector raised this during the LDP Examination to ensure that the proposals maps remained appropriate given the new evidence. Some modifications were made in light of the publication of the aggregates safeguarding maps, specifically in relation to high PSV sandstone. Annual monitoring demonstrates that proposals within safeguarded areas have been given adequate consideration and approvals given where proposals do not conflict with local policy PSE 15. Nonetheless, it would be appropriate to revisit the safeguarding as part of the review of the LDP to ensure that the policy remains effective without being unnecessarily restrictive.
- 3.6.24 Urban areas were excluded from safeguarding due to the need to retain buffers around the different minerals. In order to retain a 100m buffer around sand and gravel, an urban area in excess of 9ha would need to be redeveloped (assuming that there is a deposit of at least 100mx100m) and for limestone, an urban area in excess of 25ha would need to be redeveloped. There were no areas identified for redevelopment of this scale within the County. Should a planning application for areas greater than 9ha come forward, the presence of minerals should be

considered, as should the appropriateness of extracting the mineral prior to development.

- 3.6.25 A number of allocations within the Local Development Plan fall within areas which lie within minerals which are safeguarded. As part of the Local Development Plan process, the allocations were considered against the safeguarding policy, to determine whether prior extraction should be required. The need for additional housing and employment land has been identified by the local authority and the sites put forward considered the most appropriate and likely to be delivered over the life of the Local Development Plan. Table 13 identifies the main settlements within the County and provides discussion to explain the rationale for the allocations with respect to the safeguarding policy.
- 3.6.26 The Local Development Plan strategy has been to direct the majority of development to the north of the County to existing settlements, and where feasible, make the best use of brownfield land. As a result, the majority of allocations are in close proximity to sensitive development which makes them unsuitable for prior extraction. Furthermore, outside of the main towns and the key strategic site, allocations are small in scale and are not large enough to merit prior extraction, particularly for hard rock.
- 3.6.27 On balance, the requirement for the allocations proposed was considered to outweigh the need to protect the resource because of the constrained nature of the County. The majority of resources within the allocations had already been sterilised and whilst extensions to the urban area would further sterilise the resource, such sterilisation would be limited to those areas which are unlikely to be suitable for mineral extraction anyway. Prior extraction was considered unsuitable because of the proximity of proposed development to existing urban areas and the likely impact on residential and visual amenity, the resultant landform and highways impacts.
- 3.6.28 The safeguarding of mineral deposits does not preclude all other development, but rather requires both developers and the Council to consider the impact of the development on the mineral resource. Where a proposed development would sterilise the resource for future generations, the mineral should be extracted prior to the development, the planning application refused or the planning application granted if there is an overriding need for the development. Local policy PSE 17 sets out criteria for assessing proposals for mineral extraction.

3.6.29 Table 13 Mineral allocations close to main settlements

LDP Map	Settlement	Mineral resource	Discussion
40A	Bodelwyddan	Limestone	The limestone outcrop runs alongside the Key Strategic Site but does not fall within the allocation. The limestone is already sterilised in this area by sensitive development and the A55.

05A	Corwen	Sand and Gravel	The allocations in this area are largely developed and prior extraction is therefore not suitable. Allocation BSC Housing 05A-01 and BSC-HSG 05A-02 are relatively small and within close proximity to sensitive development and are therefore not considered suitable for prior extraction.
01A	Denbigh	Mixture of Sand and Gravel, and Limestone	The allocation for waste, VOE-WST 01A-05 was proposed as an after use for the quarry following cessation of extraction. There is therefore no conflict between this allocation and the need to safeguard minerals. Allocation PSE-EMP 01A-03 is mostly developed, with a small area of land undeveloped. It is therefore not considered suitable for prior extraction.
46A	St Asaph	Sand and Gravel	It was not considered feasible to require prior extraction.
03A	Llangollen	Sand and Gravel	The allocations within the sand and gravel resource are partly on previously developed land or are for recreation and open space and do not therefore conflict with the safeguarding requirement. The sand and gravel resource lies within the flood plain and would therefore create a water body were prior extraction to be required. It is therefore not considered suitable for prior extraction.
43A	Prestatyn	Coal, Sand and Gravel, and Limestone	The allocations within Prestatyn are partly on previously developed land. Prior extraction is therefore not considered feasible.
02A	Ruthin	Sand and Gravel	The allocations within Ruthin include existing sites with planning permission. There are no new Greenfield allocations within the town within the sand and gravel resource. It is therefore not possible to require prior extraction.
45A	Rhyl	n/a	No new allocations within minerals which are to be safeguarded.

Villages and Hamlets	Sand and Gravel, Limestone, Gritstone and Igneous Volcanic Rock	Due to the small size of these allocations they have been presented together. Allocations are located in close proximity to sensitive receptors, are constrained by a number of factors such as landscape designation and accessibility and would therefore not be considered suitable for prior extraction.
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3.6.30 Buffer zones have been applied to quarries with planning permission, in line with paragraph 14.7.16 of Planning Policy Wales to avoid conflict between mineral workings and other land uses. In the case of hard rock quarries a buffer of 200m was applied and in the case of sand and gravel a buffer of 100m was applied. Since the LDP was adopted Pentre Uchaf (Sand and Gravel) and Aberduna (Limestone) have been restored and therefore no longer require a buffer zone. Local policy PSE 16 sets out the policy approach and is considered fit for purpose, however, the proposals maps would need to updated accordingly.

4. Previous Annual Monitoring Reports

4.1 Introduction

4.1.1 Denbighshire County Council Local Development Plan 2006 – 2021 (LDP) was adopted on 4th June 2013. It provides a clear vision on how new development can address the challenges faced by the County and where, when and how much new development can take place up to 2021.

4.1.2 Under the obligations of Section 76 of the Planning and Compulsory Purchase Act 2004, as amended, and Section 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, the Council is duty bound to produce an annual monitoring report for submission to Welsh Government (WG) by 31st October each year and ensure it is publicised on its website.

4.1.3 This section draws together the findings of local policy performance on the basis of the two annual monitoring reports that have already been submitted to Welsh Government in previous years. Every section below is complemented by a table providing an overview of indicators and trigger level. The last column is labelled 'Performance Summary'. If it contains the text 'Local policy review is not required' that means a local policy review would not be required as a result of the AMR.

4.2 Local policy performance

4.2.1 Subdivided into topics, every section below is supplemented by a table providing an overview of indicators and trigger level. The last column is labelled 'Performance Summary'. If it contains the text 'Local policy review is not required' that means a local policy review would not be required as a result of the AMR. This

does however not preclude a local policy review on the basis of other considerations such as national policy.

Local economy

4.2.2 There is an opportunity to reconsider some indicators and trigger levels with regard to employment land allocations as part of the LDP Review. For example, Denbighshire has a number of existing employment sites within the main settlements of Rhyl, Prestatyn, Denbigh, Ruthin, etc. These sites have vacant premises and benefit from infrastructure provision and public transport services. Local policy BSC 2 'Brownfield Development Priority' does direct new development towards those sites for best and efficient land use. Local policy PSE 2 is however measured with regard to the amount of new, i.e. greenfield, employment land take-up. Hence there is a conflict between supporting the brownfield development priority and employment land delivery on greenfield sites. Table 14 presents an overview of monitoring indicators and trigger levels as set out in the Annual Monitoring Framework.

4.2.3 Table 14 LDP AMR – Employment land

LDP Policy	Indicator	Trigger Level	Performance Summary
PSE 2 – Land for Employment Uses	The amount of new employment land, in hectares, granted planning permission	Less than 3 hectares per year for 3 consecutive years	Local policy review is recommended based on the low (new) employment land take up.
PSE 1 – North Wales Coast Strategic Regeneration Area; PSE 3 – Protection of Employment Land and Buildings	The amount of employment land, in hectares, lost to non-employment uses	More than 5% lost in conflict with Policy PSE 3 in comparison to the amount of employment land available, in hectares, in the year of LDP adoption	Local policy review is not required
PSE 5 – Rural Economy	Unemployment levels	Increase in unemployment levels in rural areas 5% above 2011 levels	Local policy review is not required

Retail economy

4.2.3 Local policy performance has been in line with the indicators and trigger levels that have been set in the LDP Annual Monitoring Report for the last four years. The Council may however wish to re-consider including trigger levels such as, '5% increase in non-retail uses in a town centre for 3 consecutive years' for local policy PSE 8 into the next LDP because Welsh Government recognises the changing nature and function of town centres with promoting greater diversification in land uses.

4.2.4 Individual indicators and trigger levels will therefore be subject to review and amendment to reflect factual changes with regard to implemented schemes or already approved retail developments. There could also be a need to consider introducing new local policies depending on the recommendations of the emerging retail capacity study and corporate strategies. Table 15 presents an overview of monitoring indicators and trigger levels as set out in the Annual Monitoring Framework.

4.2.5 Table 15 LDP AMR - Retail

LDP Policy	Indicator	Trigger Level	Performance Summary
PSE 6 – Retail Economy; PSE 9 – Out of Centre Retail Development	Amount of unallocated new major retail, office and leisure floor space permitted outside town centres	1 new major retail, office and leisure development permitted outside town centres contrary to LDP policy	Local policy review is not required
PSE 7 – Proposals for New Retail Development	The provision of new non-food retail floor space in Rhyl, Prestatyn and Denbigh	No projects delivered by 2015.	Local policy review is not required
PSE 8 – Development within Town Centres	Number of shops lost due to a change of use	5% increase in non-retail uses in a town centre for 3 consecutive years	Local policy review is not required
PSE 6 – Retail Economy; PSE 8 - Development within Town Centres; PSE 9 - Out of Centre Retail	Number of vacant retail units within town centres	Vacancy rate of 15% or above for 3 consecutive years	There is one town centre that had a vacancy rate of above 15% for 3 consecutive years. Local policy or trigger may be subject to review

Development			
PSE 10 – Local Shops and Services	Number of local shops or services lost due to a change of use	Loss of any local shop or service contrary to policy	Local policy review is not required

Visitor economy

4.2.6 Table 16 presents an overview of monitoring indicators and trigger levels for tourism-related policies as set out in the Annual Monitoring Framework.

4.2.7 Table 16 LDP AMR - Tourism

LDP Policy	Indicator	Trigger Level	Performance Summary
PSE 1 – North Wales Coast Strategic Regeneration Area	Number of tourism facilities lost through change of use	Loss of any tourism facility except where justified in line with policy	Local policy review would not be required based on the tourism element. For further information see also paragraphs
	Number of planning permissions granted and completed in accordance with policies PSE1 criteria iii), PSE 11, PSE 12 and PSE 14	No planning permissions granted over 3 years in accordance with the named policies	

Minerals

4.2.8 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.

4.2.9 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.

4.2.10 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. Table 17 presents an overview of monitoring indicators and trigger levels as set out in the Annual Monitoring Framework. There are currently no proposals to review or re-define them.

4.2.11 Table 17 LDP AMR - Minerals

LDP Policy	Indicator	Trigger Level	Performance Summary
PSE 15 – Safeguarding Minerals	Area of mineral lost to development	Loss of identified mineral except where justified in line with the policy	Local policy review is not required
PSE 16 – Mineral buffer zones	Number of planning permissions granted for sensitive development in buffer zones	One or more planning permission granted for sensitive development within a buffer zone	Local policy review is not required
PSE 17 – Future Mineral Extraction	Tonnes of sand & gravel extraction permitted. Maintain a 10 year landbank of hard rock	No extraction permitted by 2017. Landbank falls below 10 years	Local policy may be subject to review, depending on the submission of any relevant planning permission

5. Sustainability Appraisal and Habitats Regulations Appraisal

5.1 Introduction

5.1.1 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.

5.1.2 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.

5.1.3 Whilst not applicable in 2013, the revised LDP will need 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.

5.2 Sustainability Appraisal

5.2.1 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.

5.2.2 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.

5.2.3 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.

5.3 Habitat Regulations Assessment (Update July 2017)

5.3.1 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.

5.3.2 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.

- 5.3.3 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.

DRAFT

Appendix I – Local policy and land allocations reflecting the priorities of the Wales Spatial Plan

<i>Wales Spatial Plan Priority</i>	<i>National Policy [PPW Edition 9 and Technical Advice Notes (TANs)]</i>	<i>LDP Vision</i>	<i>LDP Objective</i>	<i>Local Policy</i>	<i>Land Allocations</i>
Area: All Wales					
An innovative, high value-added economy for Wales which utilises and develops the skills and knowledge of the people; creates wealth and promotes the spreading of that prosperity throughout Wales; adds to the quality of life as well as the standard of living and the working environment. Employment-related property development to be located near public transport and close	Section 4.7 – Sustainable settlement strategy: locating new development; Paragraph 4.9.1 – Preference for use of previously developed land; Chapter 10 – Retail and Commercial Development; TAN 4 – Retail and Commercial Development; TAN 12 – Design; TAN 6 – Planning for Sustainable Rural Communities; TAN 15 – Development and Flood Risk; TAN 18 - Transport	“...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 ... The demographic profile of the County may have been influenced through the provision of an adequate supply of quality housing... Rhyl will be an attractive place to live and work with improved housing stock... focussing development	Objective 1: Population and community; Objective 2 & 3: Economy & Jobs; Objective 4: Retail; Objective 13: Mixed Use Development	PSE 1: North Wales Coast Strategic Regeneration Area; PSE 2: Land for Employment Uses; PSE 3: Protection of employment land and buildings; PSE 4: Re-use and adaptation of redundant rural buildings in open countryside; PSE 5: Rural Economy	Key Strategic Site at Bodelwyddan Employment land allocations in Lower Growth Towns Preference for re-use of rural premises for employment purposes Rural development strategy Local shops and services

to housing and infrastructure developments.		opportunities onto brown field sites within the current town limits... Bodelwyddan will have become a much expanded settlement serving much of the housing and employment needs of the north of the County..."			Sustainable forms of tourism and outdoor activities
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<i>Wales Spatial Plan Priority</i>	<i>National Policy [PPW Edition 9 and Technical Advice Notes (TANs)]</i>	<i>LDP Vision</i>	<i>LDP Objective</i>	<i>Local Policy</i>	<i>Land Allocations</i>
Area: North East Wales					
Strengthen key hubs including Rhyl/ Prestatyn/ St Asaph/ Bodelwyddan hub as a focus for investment in future employment, housing, retail, leisure and services. Outside the hubs, strong sustainable communities will be fostered within	Section 4.7 – Sustainable settlement strategy: locating new development; Chapter 7 – Economic Development; Chapter 10 – Retail and Commercial Development; TAN 4 – Retail and Commercial Development;	“...Bodelwyddan will have become a much expanded settlement serving much of the housing and employment needs of the north of the County. The employment allocations at Bodelwyddan and St Asaph will be supporting the regeneration of Rhyl and also providing attractive opportunities for inward investment and expansion of high quality businesses within the County...”	Objective 1: Population and community; Objective 2 & 3: Economy & Jobs; Objective 4: Retail; Objective 13: Mixed Use Development	PSE 1: North Wales Coast Strategic Regeneration Area; PSE 2: Land for Employment Uses; PSE 3: Protection of employment land and buildings; PSE 4: Re-use and adaptation of redundant rural buildings in open countryside;	Key Strategic Site at Bodelwyddan Employment land allocations in Lower Growth Towns Protection of existing employment premises

coastal, border and rural towns and villages to provide locally accessible jobs and services.	TAN 12 – Design; TAN 23 – Economic Development			PSE 5: Rural Economy; PSE 10: Local Shops and services	
Focus on areas in need of regeneration	Paragraph 4.9.1 – Preference for use of previously developed land; Chapter 7 – Economic Development; TAN 23 – Economic Development	“...The employment allocations at Bodelwyddan and St Asaph will be supporting the regeneration of Rhyl... Rhyl will be an attractive place to live and work with improved housing stock and a reduction in the levels of multiple deprivation currently seen. The LDP will play a part in this by encouraging regeneration through support for the initiatives arising from the Strategic Regeneration Area designation and by focussing development opportunities onto brown field sites within the current town limits. The retail performance of Rhyl will have been improved through the re-development of the Queen’s Arcade, reinforcing its role as a sub-regional shopping centre.”	Objective 2 & 3: Economy & Jobs; Objective 4: Retail; Objective 5 & 6 Transport; Objective 12: Infrastructure	PSE 1: North Wales Coast Strategic Regeneration Area; PSE 2: Land for Employment Uses; PSE 3: Protection of employment land and buildings; PSE 4: Re-use and adaptation of redundant rural buildings in open countryside; PSE 5: Rural Economy	New land allocations have been made in Rhyl, Prestatyn, Denbigh, and Llangollen where brownfield sites could be identified
Enhancing links between areas of	Section 4.7 – Sustainable settlement strategy:	Transport linkages between the A55 corridor and the	Objectives 2 & 3: Economy & Jobs; Objectives 5 & 6:	PSE 1: North Wales Coast Strategic	Key Strategic Site at Bodelwyddan

opportunity and areas of need	locating new development; Paragraph 4.9.1 – Preference for use of previously developed land; Chapter 7 – Economic Development; Chapter 10 – Retail and Commercial Development; TAN 4 – Retail and Commercial Development; TAN 12 – Design; TAN 23 – Economic Development	Coast will have been improved through the increased viability of public transport services due to the rise in population in this area.	Transport; Objective 12: Infrastructure; Objective 13: Mixed Use Development	Regeneration Area; PSE 2: Land for Employment Uses; PSE 3: Protection of employment land and buildings	
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<i>Wales Spatial Plan Priority</i>	<i>National Policy [PPW Edition 9 and Technical Advice Notes (TANs)]</i>	<i>LDP Vision</i>	<i>LDP Objective</i>	<i>Local Policy</i>	<i>Land Allocations</i>
Area: Central Wales					
Building on key centres, improving linkages and spreading benefit to wider	Section 4.7 – Sustainable settlement strategy: locating new development;	The market towns of Denbigh, Ruthin and Corwen will have been strengthened through the development of new market and	Objective 1: Population & Community; Objective 2 & 3: Economy and jobs; Objective 12:	PSE 4: Re-use and adaptation of redundant rural buildings in open countryside; PSE 5: Rural	Employment allocations in Lower Growth Areas Preference for re-use of rural premises for employment purposes

<p>hinterlands and rural communities. Enhancing attractiveness as a place to live and work sustainably.</p>	<p>Paragraph 4.9.1 – Preference for use of previously developed land; Chapter 11- Tourism, Sport and Recreation; TAN 12 – Design; TAN 16 – Sport, Recreation and Open Space</p>	<p>affordable housing and employment sites to meet local needs. Llangollen will have been supported in its role as an important tourism hub through the protection and enhancement of the town and its wider environment.</p>	<p>Infrastructure; Objective 15: Tourism; Objective 16: Areas of Protection;</p>	<p>Economy; PSE 10: Local Shops and services</p>	<p>Rural development strategy</p> <p>Local shops and services</p> <p>Sustainable forms of tourism and outdoor activities</p>
<p>Enabling appropriate and integrated growth and development in rural communities.</p>	<p>Section 4.7 – Sustainable settlement strategy: locating new development; TAN 12 - Design</p>	<p>The rural areas will be more sustainable having been allowed an appropriate level of growth to help to support rural services and facilities. Progress will have been made on meeting affordable housing needs for local people</p>	<p>Objective 1: Population & Communities; Objectives 2 & 3: Economy & Jobs; Objective 4: Retail; Objective 5: Transport; Objective 7: Welsh Language; Objective 12: Infrastructure; Objective 15: Tourism; Objective 16: Areas of Protection</p>	<p>PSE 4: Re-use and adaptation of redundant rural buildings in open countryside; PSE 5: Rural Economy; PSE 10: Local Shops and services</p>	<p>Employment allocations in Lower Growth Areas</p> <p>Preference for re-use of rural premises for employment purposes</p> <p>Rural development strategy</p> <p>Local shops and services</p> <p>Sustainable forms of tourism and outdoor activities</p>