

Denbighshire County Council

Draft: LDP Review Report, Replacement LDP Delivery Agreement and SA Scoping Report.

Consultation Report

1. CONSULTATION UNDERTAKEN

1.1 Consultation on the draft LDP Review Report Delivery Agreement and SA Scoping report ran for 9 weeks from 21st August 2017 to 20th October 2017. This was a public consultation and was open for anyone to respond. The consultation included the following:

- Letters / emails were sent to contacts on the LDP database; public bodies; statutory consultees; local, regional and national organisations with an interest in the LDP; plus agents /developers, registered social landlords, statutory consultees (eg NRW, WG), relevant landowners and others with an interest in the LDP.
- All County Councillors notified
- All Denbighshire City, Town & Community Councils notified, together with neighbouring Counties, Town & Community Councils
- Council libraries and One-Stop-Shops also received hard copies of the consultation documents.
- The documents were published on the Council's website.

1.2 A total of 23 written responses were received, Representations included comments from Natural Resources Wales, Anwyl Construction and Denbighshire residents. All comments received have been logged, acknowledged and scanned. Copies of the scanned responses are available on request. The key issues raised are summarised in Section 2 of this report, a more detailed list of comments made and the draft Council response and any proposed changes are shown in a table in Section 3 to this report.

2. SUMMARY OF KEY ISSUES RAISED

REVIEW REPORT

Key issues

The majority of comments received related to the strategy, particularly the growth levels in the existing LDP and how this had been delivered. Opinions were divided between those that wished to see growth levels maintained and those wishing to see them reduced for the replacement LDP. The role of the Review Report is to outline how the LDP has performed and to highlight areas that will need reconsideration in any replacement LDP. It is not the role of the Review Report to recommend what any changes should be as these will be determined following analysis of an up to date evidence base and extensive engagement and consultation at later stages of LDP preparation. For this reason, the majority of the draft Council responses repeat this and the changes proposed are largely 'None required' as the comments will be taken on board for later stages do not require any changes to the Review Report.

The structure of the report could have been clearer and has been amended to improve its legibility.

The new Corporate Plan has been adopted since the consultation draft was written and the Review Report has been updated to reflect this.

INFORMATION PAPERS

Key issues

Minor changes were made to information papers to reflect the adoption of the new Corporate Plan and any updated guidance.

HABITATS REGULATION APPRAISAL

Key issues

The work on the Habitats Regulations Appraisal was supported and no changes were required.

DELIVERY AGREEMENT

Key issues

Consultation on the Delivery Agreement was welcomed

Updated lists of specific and general consultees

SUSTAINABILITY APPRAISAL SCOPING REPORT

Key issues

The work on the Sustainability Appraisal Scoping was supported and no changes were required.

OTHER AMENDMENTS

- 2.13 A number of other amendments have been made to the documents to provide greater clarity and improve consistency.

3. DETAILED COMMENTS RECEIVED (see table below)

Issue Raised	Represent or	Council Response	Changes to Consultation Documents Proposed
Review report			
The review report does not consider the potential for bringing empty homes back into use as a primary means of meeting housing need. The net requirement for new dwellings does not seem to include an assessment based on the difference between empty homes reoccupation and the need for new build.	Ian Gardner	The number of empty homes within the overall housing supply tends to remain fairly constant although the actual properties may change. There is a need for a certain number of empty homes within the housing market at any one time to allow the market to function effectively. Long term empty homes are tackled via actions stemming from the Denbighshire Housing Strategy and also the Empty Homes Delivery Plan which is currently being prepared.	None required.
Paragraph 4.26 refers to the use of commuted sums for affordable housing in lieu of the 10% target for units. A table showing what has been paid and how this money has been used by the Council would be appropriate and would complement Figure 2 on page 11.	Ian Gardner	A total of £61,742.00 has been received to date in affordable housing commuted sums contributions. The process for distributing the monies received is awaiting approval.	None required.
There is nothing in the review report to cover the growth and deployment of onshore windfarms – something that has had and continues to have a major planning and environmental impact on Denbighshire.	Ian Gardner	The Review Report highlights only those LDP policies which are not performing adequately against the LDP monitoring framework, which does not include the policies relating to onshore windfarms. Any issues and evidence relating to specific development types or topics will be included in future iterations of the Information Papers as the LDP progresses.	None required.
Paragraph 6.5 refers to ODPM – a defunct UK Government department. The acronym should be explained or the reference omitted.	Ian Gardner	This reference has been removed from the Review Report.	This reference has been removed from the Review Report.
Group are happy with the documents.	Glyn Avenue Residents Group	Support welcomed	None required
The reports identify the need for a replacement LDP for Denbighshire. The failing of the LDP 2006 - 2021 have been acknowledged by DCC and it is hoped that	Russel Reeve	Sustainability is at the heart of the LDP. Any sites proposed for the replacement LDP will need to demonstrate that they are sustainable, viable and deliverable.	None required

future Residential Land Allocations are firstly sustainable and secondly deliverable.			
Welcome the use of the Well-being Impact Assessment toolkit which will ensure compliance with Well-being of Future Generations (Wales) Act 2015 and the Planning (Wales) Act 2015	Natural Resources Wales	Support welcomed	None required
We note that the LDP vision will be assessed as part of the review process and that it will be determined whether the existing vision needs to be altered or amended as part of the Replacement LDP.	Natural Resources Wales	Comments noted	None required
We note that the Council has submitted three Annual Monitoring Reports to Welsh Government since LDP adoption and that all three identified three principal areas of concern with regard to local policy performance that the Council must focus on when drafting new local policies and when making changes to the LDP monitoring framework.	Natural Resources Wales	Comments noted	None required
We welcome the confirmation that the replacement LDP will have regard to any Area Statements produced by NRW as required by the Environment (Wales) Act 2016. The act also includes statutory targets for the reduction of greenhouse gas emissions.	Natural Resources Wales	Support welcomed	None required
The Joint Committee notes the content of the LDP Review Report and supports the conclusion that a review is required. The committee also commends Denbighshire's aim to maintain up to date local development plan coverage for the county.	AONB JAC	Support welcomed	None required
An issue which the committee would emphasise should form part of the review is the approach to AONB policy to ensure better alignment of approaches across all three local planning authorities which cover the area and	AONB JAC	Suggestion to be accommodated in the forthcoming revision of the adopted Plan; with AONB JAC being invited to put forward proposals re the re-wording of local policy.	None required

to reflect the AONB SPG which is currently in preparation. This is to ensure a consistent cross boundary approach to conservation of this nationally protected asset.			
Welcome opportunity to comment on Review Report and wish to be involved in all stages as a local stakeholder.	Anwyl Construction Co Ltd	Comments noted	None required
The Review Report sets out unsubstantiated commentary including the Councils suggested reasoning for the plan failing to achieve the planned-for levels of Housing Growth. This approach was a source of considerable concern and ultimately delay during in preparation of the current LDP. ACCL fully supports a more collaborate and inclusive approach. Examples include: Para 4.12. Comprehensive discussions with landowners and potential developers have indicated that demand in the County for new housing is comparatively low, which is also reflected in the annual completions. There is no evidence in the Review Report or Background Papers to support this.	Anwyl Construction Co Ltd	Evidence gathered as part of the annual Joint Housing Land Availability Studies supports this. Appendix 2 of the Review Report sets out progress on allocated housing sites which has been limited.	None required
Para 4.13 It is apparent that the annual growth levels [sic] is unrealistic and will not meet the initially projected growth over the remaining lifetime of the Plan. The Council satisfied the Examining Inspectors that the levels of growth proposed (the Councils used its own projections) were realistic and achievable. The Council went to considerable lengths during the delayed Examination to evidence this.	Anwyl Construction Co Ltd	The growth levels presented at examination were based on the best available evidence at the time and the Inspector was satisfied that they were 'sound'. Developers and their representatives also opined that the growth levels were achievable.	None required
Para 4.16 issues such as flood risk; topography; environmental designations and infrastructure capacity. These constraints have resulted in levels of growth for these areas being lower than those previously experienced.	Anwyl Construction Co Ltd	Comments relate to Rhyl & Prestatyn which are heavily constrained.	None required

Para 4.23 The implementation of the LDP Growth Strategy primarily suffers from the significantly low number of new homes coming forward through the planning system. Other Council Plans state "... there are signs that the housing market is relatively buoyant in Denbighshire compared to the lean years following recession in 2008-9".	Anwyl Construction Co Ltd	Evidence from the annual Joint Housing Land Availability studies shows that annual completion rates have fluctuated from 127 units to 181 units per annum since adoption of the LDP in 2013. There has been no evidence of an increasing trend of completions which may indicate a recovery in the housing market.	None required.
Para 4.24 Since previous WG population and household growth projections were grossly overestimated... The LDP growth strategy was as ACCL understand it based upon growth protections the Council itself produced.	Anwyl Construction Co Ltd	The adopted LDP was Examined and found to be 'Sound' based on evidence at the time.	None required
ACCL does not consider that reducing the level of planned-for growth (and by extension the number of homes planned) is the way to resolve a lack of housing supply and/or housing land availability. ACCL similarly does not consider the "planning system" is the reason why homes are not being delivered – many other issues can impact on delivery including the inappropriate or undeliverable allocations and inflexibility in the Development Plan in place, the willingness of landowners to release land and other policy requirements (eg affordable housing, S106 obligations, national requirements impacting of viability and construction costs.)	Anwyl Construction Co Ltd	Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required
Support current LDP growth levels	Anwyl Construction Co Ltd	Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required.
Replacement LDP must be based on credible, objective, up to date evidence. ACCL is concerned that the language used in respect of Housing Delivery in the Review Report already appears to re-visit issues which the Council accepted were not barriers to Housing Delivery. The success of intervention tools	Anwyl Construction Co Ltd	Replacement LDP will be developed based on up to date evidence and will be consulted upon at a later stage.	None required.

such as Help to Buy demonstrate is just one example of how housing delivery can be supported and accelerated.			
ACCL considers that additional land is available and capable of contributing to housing delivery in sustainable and market attractive locations and that the Review should proactively seek to deliver this land to address the existing undersupply and deliver new housing.	Anwyl Construction Co Ltd	Consideration of sites for the replacement LDP will take place at a later stage of LDP preparation.	None required.
ACCL considers the Review must consider whether it is appropriate to maintain the KSS as an allocation in the Replacement LDP.	Anwyl Construction Co Ltd	Consideration of sites for the replacement LDP will take place at a later stage of LDP preparation.	None required.
The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales and take full account of the vision of the North Wales Economic Ambition Board to deliver 120000 new job opportunities in north Wales to 2035, associated Growth Bid activities and the potential A55 corridor Strategic Development Plan provided for in the Planning (Wales) Act 2015. Regional Growth aspiration clearly points towards a requirement for significant additional housing to support employment and job creation.	Anwyl Construction Co Ltd	Replacement LDP will be developed based on up to date evidence and strategies and will be consulted upon at a later stage.	None required.
Seeking to reducing housing land supply over a period to 2035 in the opinion of ACCL contradicts the wider economic growth objectives and may have severely negative impacts for the growth agenda and Wellbeing Objectives. The Review and Background Papers should therefore examine and explore all sources of evidence of housing need, including the starting point of Welsh Government household protections, the Local Housing Market Assessment and needs arising from the North Wales Economic	Anwyl Construction Co Ltd	The Review Report is factual and highlights the need for a replacement LDP. The background papers are living documents and will be updated and consulted upon at the various stages of LDP preparation.	Introduction of new paragraph 1.7: Appendices A to E are five 'Information Papers', corresponding to the five LDP themes. They supplement the main document, and present detailed information and data on individual local policies, changes in legislation and local circumstances. The rationale behind this approach is to maintain 'living-documents' which are frequently updated to inform the revision of the LDP.

<p>Ambition Board to ensure that sufficient housing land to deliver all these objectives is identified and planned for with sufficient freeboard for flexibility and change to reduce the risk of a second failure.</p>			
<p>ACCL therefore considers that the Review Report should consider the appropriateness of higher levels of growth and greater additional flexibility through the allocation of additional land in sustainable locations where people want to live and where existing social and physical infrastructure exists to support or be enhanced by it.</p>	<p>Anwyl Construction Co Ltd</p>	<p>This is not the role of the Review Report which is a factual report looking at the past performance of the current LDP and highlighting areas for reconsideration.</p>	<p>None required</p>
<p>I agree with the statement that Denbighshire follows the guidelines of the Welsh Government with its language strategy, but it is rather negative. Respecting distinctiveness is rather insulting term from the county and Welsh Government. The Welsh language is paramount to every resident within Wales - Cymru. Is English a distinct language also? If the Welsh Government aim to have one million Welsh speakers by 2050 isn't this pie in the sky with this kind of strategy. One way of reaching this goal would be to build new Welsh Medium Schools in areas which will have housing developments. Could find out where the owners of new houses originated from?</p>	<p>Cynghorydd Arwel Roberts</p>	<p>The term 'Respecting Distinctiveness' was used in the adopted LDP as it was a theme in the Wales Spatial Plan.</p> <p>Detailed policies for the replacement LDP will be developed based on evidence and consulted upon at a later stage.</p> <p>An update to the 2011 New Housing Occupancy Study is being carried out and will provide further information on where the occupants of new housing in Denbighshire have originated from.</p>	<p>None required.</p>
<p>In the last LDP for instance Barwoods agreed to place money to develop the Welsh language in Bodelwyddan, this should be enhanced further with the condition that every housing development over 80 houses should provide money to enhance the Welsh language and culture. Those under 80 could also provide money but on a lower ratio.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Detailed policies and requirements for the replacement LDP will be developed based on evidence and consulted upon at a later stage.</p>	<p>None required</p>

<p>Sir Ddinbych has been challenged to build a certain amount of houses. In the last LDP the target was 7,500 houses during 2006 - 2021. Land has been specified for such houses including Bodelwyddan. Again this is pie in the sky, the amount of houses within the target should be lessened by 2,500. It isn't Denbighshire's fault that developers haven't the finances to build houses and surely it will be worse in the coming years with Brexit.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	<p>None required</p>
<p>Affordable and modern houses are needed in our communities, projects such as County Council built houses should be supported by the Welsh Government and Sir Ddinbych. A good start is the 170 such houses in the pipeline.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Comment noted.</p>	<p>None required</p>
<p>Mae'n rhaid cynyddu nifer yr aneddiadau fforddiadwy newydd a adeiladir yn y Sir. Mae 170 o dai cyngor yn gam i'r cyfeiriad cywir. Rhaid i Llywodraeth Cymru a Sir Ddinbych gynyddu y nifer o dai fforddiadwy a gwblhawyd yn 2016-2017. Pum deg pump, siomedig iawn! Rhaid ceisio ymdrechu ymhellach i droi tai gwag yn dai fforddiadwy, angen eu hailddefnyddio yn bendant. Beth am gynlluniau i adeiladu mwy o dai cysgodol. Paham na fedrwch ddatblygu safle ysbyty meddwl Dinbych i'r cyfeiriad hwn? Wrth gwrs mi fedrwch adeiladu tai cyngor yno hefyd a thai fforddiadwy dan ofal cymdeithasau tai fel Cynefin.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd polisïau a gofynion manwl ar gyfer y CDLI newydd yn cael eu datblygu yn seiliedig ar dystiolaeth ac ymgynghorir arnynt yn ddiweddarach.</p>	<p>Dim angen</p>
<p>Mae angen yr un meddylfryd i gynnal a gwella bywiogrwydd a hyfywedd canol trefi. Adeiladu fflatiau a thai fforddiadwy ynddynt yn cynnwys siopiau.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd polisïau a gofynion manwl ar gyfer y CDLI newydd yn cael eu datblygu yn seiliedig ar dystiolaeth ac ymgynghorir arnynt yn ddiweddarach.</p>	<p>Dim angen</p>

<p>Un peth sydd yn llethu datblygiadau tai yw datblygwyr yn cael caniatad i adeiladu nifer o dai ar ddarn o dir am bum mlynedd. Maent yn gosod y seiliau ac oherwydd nid oes angen caniatad adeiladu yn ystod y pum mlynedd nesaf. Mae gennym engraifft o hyn yn Rhuddlan. Rhaid i bob Sir a Llywodraethau Prydeinig a Chymreig ddatrys y broblem hon.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Sylwadau wedi'u nodi.</p>	<p>Dim angen</p>
<p>Rhaid amddiffyn lleoedd agored yn ein cymunedau, meysydd chwarae, parciau cyhoeddus. Hefyd ardaloedd gwyrdd rhwng trefi, er enghraifft rhwng Rhyl a Rhuddlan, mae yr ardaloedd hyn yn aml yn cynnig amrywiaeth o fywyd gwylt i'n cymunedau. Rhaid diogelu y bioamrywiaeth yn ein hardaloedd fel mae deddf amgylchedd Cymru 2016 yn nodi. Yr un modd ein hadeiladau rhestredig ac yn y blaen.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd polisiâu a gofynion manwl ar gyfer y CDLI newydd yn cael eu datblygu yn seiliedig ar dystiolaeth ac ymgynghorir arnynt yn ddiweddarach.</p>	<p>Dim angen</p>
<p>Rwyf yn methu deall pam fod yn rhaid i'r Sir chwilio am safleoedd adeiladu ychwanegol yn ystod y pum mlynedd nesaf. Mae Polisi Cynllunio Cymru yn pwysleisio'r angen i Awdurdodau Cynllunio Lleol ddangos bod cyflenwad tir tai 5 mlynedd ar gael. Nid oes unrhyw synnwyr yn hyn, mae y tir ar gael rwan a dim un tŷ wedi adeiladu arnynt. Mae TAN 1 cyd astudiaethau argaeledd tir ar gyfer tai yn bwrpasol yn creu gofid yn ein cymunedau.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd lefelau twf ar gyfer y CDLI newydd yn cael eu pennu yn seiliedig ar dystiolaeth gyfredol a byddant yn ymgynghori â hwy yn nes ymlaen.</p>	<p>Dim angen</p>
<p>I orffen mae gennym ddigon o dir yn barod i adeiladu ychwaneg o dai, nid oes angen mwy o dir.</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd lefelau twf ar gyfer y CDLI newydd yn cael eu pennu yn seiliedig ar dystiolaeth gyfredol a byddant yn ymgynghori â hwy yn nes ymlaen.</p>	<p>Dim angen</p>
<p>RHAID I'R CYNLLUN DATBLYGU LLEOL nesaf fod yn fwy realistig ynghlyn â'r hyn y gellir ei darparu mewn cyfyngiadau fel</p>	<p>Cynghorydd Arwel Roberts</p>	<p>Bydd lefelau twf ar gyfer y CDLI newydd yn cael eu pennu yn seiliedig ar dystiolaeth gyfredol a byddant yn ymgynghori â hwy yn nes ymlaen.</p>	<p>Dim angen</p>

isadeiladwaith, hyfywdra a chapasiti y sector adeiladu.			
I believe that a strongly worded letter should be sent to the Welsh Government criticising them for their flawed calculations regarding projected population numbers, and insisting that the LDP should place greater weight on local demand rather than some arbitrary population growth, which creates a flawed Development Plan.	Cynghorydd Mabon ap Gwynfor	Comments noted. Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None Required
Research used by DCC showed that demand for affordable housing was 59% yet the Welsh Government's Planning Inspectorate forced DCC to accept 10%. This is wholly unacceptable and DCC should, in my view, make that clear before we start to review the current plan, which will in effect set the foundations of the next Plan.	Cynghorydd Mabon ap Gwynfor	Comments noted. Growth levels and affordable housing requirements for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None Required
Flintshire County Council are pleased to see Denbighshire embarking on a review of the LDP as required by virtue of the relevant 2004 legislation. Furthermore the opportunity to comment on the document is appreciated. In addition FCC would welcome working closely with Denbighshire on the review alongside the progression of our Local Development Plan given that the Preferred Strategy will shortly be going out to consultation. Welcome joint working on the evidence base. Having looked at the Review Report and its accompanying information papers I have not identified any specific areas or issues of concern for Flintshire as one of your neighbouring authorities.	Flintshire County Council	Comments welcomed, joint working on preparing an evidence base is supported.	None required
The document itself is obscure in that it outlines this review as a 'first step' and then concludes that it will 'fully review this LDP and	Carole Roxburgh	Agreed, comment noted	Introduction to be reworded to provide greater clarity on the purpose of the

other documents to then draw up a replacement plan'. It also reviews Council performance in the absence of the issues at large. Clarification is required.			document, and restructure of individual paragraphs.
The document acknowledges that 'comprehensive discussions with landowners and potential developers have indicated that demand in the County for new housing is comparatively low' and that the 'annual growth levels is unrealistic.' In addition it states that the Welsh Government 'population and household growth projections were grossly overestimated.' This is concerning as the last minute inclusion of a number of sites into the LDP seems to have been inappropriate and resulted in greenfield sites coming forward for development at the expense of brownfield sites. This is in contrary to Planning Policy Wales' preference for development on brownfield sites before greenfield.	Carole Roxburgh	The adopted LDP was Examined and found to be 'Sound' based on evidence at the time.	None required
Annual monitoring reviews are conducted to show the performance of the Council to meet the targets. It now appears that the failure to produce the number of new builds in line with the current LDP may be as a result of unrealistic and inappropriate target setting and low housing need. If it is the case that the review allows the monitoring and performance of the Council then there is a need to review their efforts to present accurate figures to the Welsh Government and negotiate appropriate targets. The work the Council has or has not performed in relation to this should be included within the review. When can we expect more realistic figures?	Carole Roxburgh	Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required
While the production of a new LDP is required, it is a lengthy process. What is the process for amending the current LDP to remove those	Carole Roxburgh	This is the process for reviewing and replacing the current LDP. The Review Report highlights issues that cannot be dealt with via a 'light	None required.

<p>'additional sites' that it appears (given the content of this review) should not have been included in the first place?</p>		<p>touch' review as they go to the heart of the LDP strategy. There is no mechanism to remove sites from the current LDP in the short term.</p>	
<p>The document itself is obscure in that it outlines this review as a 'first step' and then concludes that it will 'fully review this LDP and other documents to then draw up a replacement plan'. It also reviews Council performance in the absence of the issues at large. Clarification is required.</p>	<p>G H & E J Williams</p>	<p>Agreed, comment noted</p>	<p>Introduction to be reworded to provide greater clarity on the purpose of the document, and restructure of individual paragraphs.</p>
<p>The document acknowledges that 'comprehensive discussions with landowners and potential developers have indicated that demand in the County for new housing is comparatively low' and that the 'annual growth levels is unrealistic.' In addition it states that the Welsh Government 'population and household growth projections were grossly overestimated.'</p> <p>This is concerning as the last minute inclusion of a number of sites into the LDP seems to have been inappropriate and resulted in greenfield sites coming forward for development at the expense of brownfield sites. This is in contrary to Planning Policy Wales' preference for development on brownfield sites before greenfield.</p>	<p>G H & E J Williams</p>	<p>The adopted LDP was Examined and found to be 'Sound' based on evidence at the time.</p>	<p>None required</p>
<p>Annual monitoring reviews are conducted to show the performance of the Council to meet the targets. It now appears that the failure to produce the number of new builds in line with the current LDP may be as a result of unrealistic and inappropriate target setting and low housing need. If it is the case that the review allows the monitoring and performance of the Council then there is a need to review their efforts to present accurate figures to the Welsh Government and negotiate appropriate targets. The work the Council has or has not</p>	<p>G H & E J Williams</p>	<p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	<p>None required.</p>

performed in relation to this should be included within the review. When can we expect more realistic figures?			
While the production of a new LDP is required, it is a lengthy process. What is the process for amending the current LDP to remove those 'additional sites' that it appears (given the content of this review) should not have been included in the first place?	G H & E J Williams	This is the process for reviewing and replacing the current LDP. The Review Report highlights issues that cannot be dealt with via a 'light touch' review as they go to the heart of the LDP strategy. There is no mechanism to remove sites from the current LDP in the short term.	None required.
Is it the intention to amend the current LDP or simply use the LDP report as the first step to develop a new LDP after 2021? The document is ambiguous about this point.	Dr H Watkin	The LDP Review Report will be used as a first step towards developing a replacement LDP to be adopted by 2021.	None required.
What is the procedure to make amendments to the current LDP before 2021 (irrespective of whether the Council intend to do so or not) ?	Dr H Watkin	This is the process for reviewing and replacing the current LDP. The Review Report highlights issues that cannot be dealt with via a 'light touch' review as they go to the heart of the LDP strategy. There is no mechanism to remove sites from the current LDP in the short term.	None required
The LDP review report provides evidence to back its claim that the original population growth and demand for housing are unrealistic and indeed were grossly overestimated. The Council then berates itself for completely failing to deliver the housing levels in the Planning Strategy. It is difficult to understand why the Council takes itself to task for failing to meet a demand which was grossly overestimated.	Dr H Watkin	Comments noted	None required
Has the Council discussed with Welsh Government the 2015 figures and projections? If not does it intend to do so? Will it press for an amended and lower target of new homes before 2021?	Dr H Watkin	The updated population and household projections will inform discussions on the LDP preferred growth strategy when this is developed in the future. It is not possible to comment on what future growth levels in the replacement LDP will be as they will emerge following engagement and consultation.	None required.

<p>In paragraph 2.2 Welsh Government provide three triggers for reviewing an adopted LDP: (1) Significant contextual change (2) Significant concerns from the findings of the AMR in terms of policy effectiveness, progress rates and any problems with implementation (3) S69 / Regulation 41 review requirement Does the Council regard the “grossly overestimated” demand for housing a significant contextual change? (If not why not?)</p>	<p>Dr H Watkin</p>	<p>The conclusions of the various Annual Monitoring Reports and Review Report indicate that there is evidence that a full replacement LDP is required. There is a requirement to review an LDP 4 years from adoption which is 2017 as the LDP was adopted in 2013.</p>	<p>None required</p>
<p>Does it regard the overestimated figures as a significant concern? (If not why not) Will the current situation trigger a review of the adopted LDP, aiming for a change in the target figures for housing?</p>	<p>Dr H Watkin</p>	<p>The adopted LDP was Examined and found to be ‘Sound’ based on evidence at the time. There is a requirement to review the LDP and consider a replacement every 4 years from adoption. The growth levels in the replacement LDP will be determined following analysis of the evidence and engagement and consultation at the appropriate stage.</p>	<p>None required</p>
<p>The following are questions and observations regarding Denbigh itself. Denbigh has been recognised as a low growth town. There has been no demand for the 8 hectares of new employment land with consideration to de-allocate the site. This lack of new employment development confirms Denbigh as a low growth town.</p>	<p>Dr H Watkin</p>	<p>The growth status of Denbigh in the replacement LDP will be determined following analysis of the evidence and engagement and consultation at the appropriate stage.</p>	<p>None required</p>
<p>Most of the allocated sites for development in Denbigh have not been taken up by developers. The LDP report mentions viability concerns as an important reason for a general lack of take up of allocated land within the county. This is consistent with Denbigh being a low growth town with low demand for new employment sites and housing.</p>	<p>Dr H Watkin</p>	<p>The growth status of Denbigh and any relevant allocations in the replacement LDP will be determined following analysis of the evidence and engagement and consultation at the appropriate stage.</p>	<p>None required</p>

<p>Denbigh has three brownfield sites; the North Wales Hospital, the Middle Lane site and the old Railway site, only the last having been developed for retail.</p> <p>Planning Policy Wales emphasises the preference for the development of brownfield sites.</p>	<p>Dr H Watkin</p>	<p>All three sites are subject to active development proposals. The current LDP prioritises the re-use of brownfield land in-line with national policy.</p>	<p>None required.</p>
<p>Denbigh and Denbighshire residents, together with their elected representatives, have become tired of waiting for progress to develop the derelict and deteriorating North Wales Hospital site. It has even been noted in the national press as being a disgrace with a redevelopment long overdue.</p> <p>The redevelopment of the site will depend on the sale of residential properties within it. Given the lack of new employment (other than a few jobs in recently built shops in town) and the lack of take up of existing development land, partly because of viability concerns, logically this will make it more difficult to redevelop the North Wales Hospital site which will depend on the sale of approximately 300 homes.</p> <p>To develop the North Wales Hospital site before using green fields would renovate a brownfield site and remove a derelict eyesore. It would protect green land and thus be a much more sustainable solution, in keeping with Planning Policy Wales</p>	<p>Dr H Watkin</p>	<p>Compulsory purchase of this site is outside of the LDP process. The Council is actively seeking a resolution for this site which will see it being brought back into beneficial use.</p>	<p>None required.</p>
<p>Now that a compulsory purchase order has been granted for the North Wales Hospital site, will the site be designated as a brownfield site within any amendment to the LDP, for priority development?</p>	<p>Dr H Watkin</p>	<p>The site is brownfield and is subject to a pending planning permission. Any specific allocation of the site in the replacement LDP will be dependent upon its planning status at the pre-deposit and deposit stages.</p>	<p>None required</p>
<p>The LDP Review Report para 2.6 states its aim as not providing detailed amendments to the LDP but is aimed at obtaining support for</p>	<p>Dr H Watkin</p>	<p>It is support for the principle of working on a replacement LDP that is being sought. The detail will be consulted upon at the appropriate stages.</p>	<p>None required</p>

<p>the ambition of starting the process of a replacement LDP. It is difficult to gain public support for an ambition which lacks any detail of what is proposed.</p>			
<p>It is likely from the comments of the public in Denbigh and both the Elected Representatives in the Town Council and across the County Council, that there would be support for a reduction in the housing numbers to be built and for brownfield sites to be prioritised.</p>	Dr H Watkin	The growth status of Denbigh in the replacement LDP will be determined following analysis of the evidence and engagement and consultation at the appropriate stage.	None required
<p>Whilst it is recognised that the housing supply numbers were foisted upon Denbighshire by the Planning Inspectorate at the stage of developing the LDP, it is less clear that the Planning Authority have made any effort to try to amend the housing numbers in the strategy.</p>	Dr H Watkin	The LDP Review Report will be used as a first step towards developing a replacement LDP to be adopted by 2021. The appropriate mechanism for any amendments to the housing numbers is through the development of a replacement LDP.	None required
<p>The inability to bring on the large development in Bodelwyddan has of course put more pressure on other areas of the county allocated for development.</p>	Dr H Watkin	The Key Strategic Site at Bodelwyddan is only one site within the wider growth and spatial strategy of the current LDP, other sites in other areas were also allocated for housing as part of the adopted LDP.	None required
<p>There is clearly a disconnect between the planning authority and the Elected Members of the whole county and Denbighshire residents, who have always argued that the housing development allocation was too high. This is reflected in the refusal to grant planning permission at Whitchurch / Old Ruthin Road and Meliden. This problem should be addressed by the County at the highest level.</p>	Dr H Watkin	The current LDP is a Denbighshire County Council document that was formally adopted by the Full Council of elected members in 2013. Officers and Elected Members of the Council work closely together in partnership and will continue to do so for the replacement LDP.	None required
<p>Will the County Councillors and the LPA come together to amend the LDP?</p>	Dr H Watkin	Elected members and officers worked closely together on the development of the current LDP which was adopted by Full Council in 2013. This close working relationship will continue for the replacement LDP.	None required

The Canal and River Trusts (the Trust) interest in the authority area is contained to the Llangollen canal and associated infrastructure, having reviewed the consultation documents the Trust have no comments to make at this stage.	Canal and River Trust	Support welcomed.	None Required
Site in Rhyl promoted	Hourigan Connolly for Coach Road Developments Ltd	There has been no call for candidate sites as part of the Replacement LDP process as yet. Representor will be added to LDP database and notified at the appropriate time.	None required
A review of the projected annual growth should not result in a reduction in the number of dwellings required. The use of the 2015 based migration trends include population growth figures which are impacted by a significant period of economic recession. The use of figures which are suppressed by a recession, without including a 'catch-up' rate, may result in the Council not meeting the needs of their population. The economic growth figure is suppressed further by the chronic under-delivery of housing within Denbighshire.	Hourigan Connolly for Coach Road Developments Ltd	Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required
Paragraph 4.12 of the LDP Review Report the Council acknowledges that the housing completions have not reached the annual minimum requirement of 533 (727 dwellings for the period from 2016/2017 onwards) since the LDP was adopted in June 2013. By not delivering housing growth the Council are restricting the levels of economic growth which can occur. A continuation of the existing spatial growth strategy is likely to perpetuate the present lack of delivery and subsequently cause further economic decline.	Hourigan Connolly for Coach Road Developments Ltd	Growth levels and the spatial strategy for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required
Paragraph 4.12: <i>"Comprehensive discussions with landowners and potential developers"</i>	Hourigan Connolly for	Comments noted.	None required

<p><i>have indicated that demand in the County for new housing is comparatively low, which is also reflected in the annual completions”</i> Hourigan Connolly are active within North Wales and have spoken with several regional housebuilders and developers. It is clear from having worked with developers that there is demand for housing, retail and employment development within Denbighshire. Our client has been approached at various intervals by national developers seeking to have a Rhyl based operation.</p>	<p>Coach Road Developments Ltd</p>		
<p>The Council state in Paragraph 4.13 that the LDP Growth Strategy will need to reflect the future need, in light of population and household projections. Our client is supportive of this approach and agrees that population and household growth projections need to be met. However, it is asserted that the population and household growth projections should be positively prepared and adjusted to reflect the impact of both the recession and persistent under-delivery of housing.</p>	<p>Hourigan Connolly for Coach Road Developments Ltd</p>	<p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	<p>None required</p>
<p>Paragraph 4.13: <i>“it is apparent that the annual growth levels is unrealistic and will not meet the initially projected growth over the remaining lifetime of the Plan”</i> This statement lacks clarity or evidence, there is no substantiated evidence provided at this juncture which supports the assertion that the growth levels are unrealistic. The Council should be taking a pro-active and positive approach to growth and be seeking alternative methods to actively increase rates of delivery. This may be through the release of additional sites for both housing and employment land, or through the relaxation of certain policies. It should not simply seek to change the housing</p>	<p>Hourigan Connolly for Coach Road Developments Ltd</p>	<p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	<p>None required</p>

requirement, as implied within this statement, without significant additional evidence relating to need.			
Paragraph 4.14 Our Client agrees with the Council that the provision of affordable and market houses to meet the identified need is crucial to the growth of Denbighshire.	Hourigan Connolly for Coach Road Developments Ltd	Support welcomed.	None required
Contend that the Council did not allocate sufficient land to deliver 7,500 dwellings in the current LDP.	Hourigan Connolly for Coach Road Developments Ltd	The independent Inspector appointed to Examine the soundness of the current LDP considered that sufficient land was allocated to meet housing need. The lower levels of housing delivered are as a result of factors such as the depressed housing market and unrealistic expectations of land values from land owners.	None required
Consider there was over-reliance on the KSS at Bodelwyddan given that lead in times for major sites are significant. Insufficient other allocations were made to accommodate slow delivery on the KSS.	Hourigan Connolly for Coach Road Developments Ltd	The independent Inspector appointed to Examine the soundness of the current LDP considered that sufficient land was allocated to meet housing need. The lower levels of housing delivered are as a result of factors such as the depressed housing market and unrealistic expectations of land values from land owners.	None required
The Council accepts within Paragraph 4.23 that the implementation of the LDP Growth Strategy primarily suffers from the significantly low number of new homes coming forward through the planning system. Our client agrees with the Council on this point, although does not agree that this is due to a lack of demand. Rather the under delivery is a product of the Plan allocating too many sites in areas where the delivery of homes is unviable and too few deliverable sites being allocated.	Hourigan Connolly for Coach Road Developments Ltd	The independent Inspector appointed to Examine the soundness of the current LDP considered that sufficient deliverable land was allocated to meet housing need.	None required
The plan also included a high proportion of brownfield sites in areas which may not have the values required to render this type of development viable.	Hourigan Connolly for Coach Road Developments Ltd	The prioritisation of brown field sites is in-line with national policy. There is not a large amount of brown field land in Denbighshire and the allocation of a significant amount of green field	None required

		land was necessary to meet the housing growth level in the current LDP	
The Council identifies within paragraph 4.30 that there has been an under-delivery of affordable housing within the county. The Council is evidently not meeting the affordable housing needs of the area, and the failure to deliver market housing is a contributing factor to this. In order to boost delivery levels, it is recommended that the Council allocate sufficient deliverable sites as part of the LDP review. A concentration solely on brownfield development first will not help. There needs to be a step-change in thinking and an acceptance that greenfield release is required to meet the demands of the development industry and to help meet the Council's aspirations for the County.	Hourigan Connolly for Coach Road Developments Ltd	The prioritisation of brown field sites is in-line with national policy. There is not a large amount of brown field land in Denbighshire and the allocation of a significant amount of green field land was necessary to meet the housing growth level in the current LDP	None required
Welcome review of Green Barriers and emphasise that they are temporary. Contend that the need to increase the housing land supply should outweigh Green Barrier designation (linked to site being promoted).	Hourigan Connolly for Coach Road Developments Ltd	Green Barrier review and the growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required
Opposed to the allocation of Bodelwyddan Key Strategic Site in current LDP.	Medwen Williams	Key Strategic Site is an allocation in an adopted LDP and has outline planning permission. The contribution the Key Strategic Site will make in the replacement LDP will be assessed at the appropriate time.	None required
Yn gwrthwynebu dyraniad Safle Strategol Allweddol Bodelwyddan yn y CDLI cyfredol.	Tom Williams	Mae'r Safle Strategol Allweddol yn ddyraniad mewn CDLI mabwysiedig ac mae ganddo ganiatâd cynllunio amlinellol. Bydd cyfraniad y bydd y Safle Strategol Allweddol yn ei wneud yn y CDLI newydd yn cael ei asesu ar yr adeg briodol.	Dim angen
In considering a Review of the LDP, we are of the opinion that the tenets of the LDP's Vision and Objectives remain unobjectionable; their	LRM Planning Ltd for Barwood Land and Estates Ltd	Comment noted.	None required

relevance and importance have not diminished over time and should endure.			
The LDP identified the KSS as a proposal able to deliver across each of these objectives. It is intrinsic to the LDP strategy and is reflected in the Objective 13 which seeks to ensure that ensure that mixed use development sites are brought forward in key locations to ensure a better delivery of infrastructure and to support well integrated communities.	LRM Planning Ltd for Barwood Land and Estates Ltd	Comment noted.	None required.
Policy BSC1, which is referred to as the subject of “significant concerns” in the review code because of potential lower levels of housing requirement in the future and low rates of housing completions, this must be seen in the context of the especially difficult economic climate that has endured for almost 10 years and which has resulted in reduced migration rates, constraints to household formation and a contraction in the housing market. These characteristics do not present a sound basis for the Review of the LDP and a more rounded consideration of future requirements is needed as required by Planning Policy Wales para 9.2.2.	LRM Planning Ltd for Barwood Land and Estates Ltd	The Review Report refers to the findings of the LDP Annual Monitoring Reports, which show policy BSC1 is not performing as required against the LDP monitoring framework. Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required.
Whilst a review of employment land is to be undertaken, we don't not believe this is will identify a location with the strategic advantages of Bodelwyddan and free from constraints with direct access to the A55 that performs equal to the KSS.	LRM Planning Ltd for Barwood Land and Estates Ltd	Comment noted	None required
Planning permission for the KSS was granted in March 2016, a little over 18 months ago and therefore represents a housing and employment commitment. The terms of the permission anticipate that the KSS will be developed over the long-term and accordingly	LRM Planning Ltd for Barwood Land and Estates Ltd	Commented noted	None required

its implementation is deep-rooted within and central to the development strategy in the next plan period.			
Trefnant Inn site not mentioned in report	Trefnant Community Council	The table at Appendix 1 only includes sites that were allocated for housing in the adopted LDP. The Trefnant Inn site was not an allocated site.	None required
Question whether there is demands for further housing in Trefnant, undeveloped allocations, over 75 houses built in past 10 years, increased building costs, no demand for affordable housing.	Trefnant Community Council	Denbighshire Joint Housing Land Availability Study records show that a total of 32 dwellings have been built in the Trefnant Community Council area since 2006. The growth status of Trefnant in the replacement LDP will be determined following analysis of the evidence, and engagement and consultation at the appropriate stage.	None required
The report highlights the changing demographics and economic downturn which has reduced the demand for new housing and even with the downgraded targets numbers are not being realised. TCC question whether the downgraded targets remain unrealisable whilst the economic climate remains depressed.	Trefnant Community Council	The replacement LDP will be developed based on up to date evidence and consulted upon at the appropriate stage.	None required
Demand remains high in smaller villages which are not being granted permission and demand for new housing on larger sites may satisfy the targets but do not address the real demand. Downgrading the targets and encouraging smaller developments in villages may reverse this trend, possibly increasing the number to 5 houses before affordable housing is required.	Trefnant Community Council	The replacement LDP will be developed based on up to date evidence and consulted upon at the appropriate stage.	None required
Welcome proposed full review of the LDP.	Home Builders Federation	Support welcomed	None required
Strongly object to proposed suggestion that the way to resolve the lack of suitable land for housing is to reduce number of homes required.	Home Builders Federation	Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.	None required

Refer to the then Minister for Housing and Regeneration letter sent to LPA's in April 2014 reaffirmed how projections should be used, this advised that: 'Local planning authorities should consider the appropriateness of the projections for their area, based on all sources of local evidence. This should include considering the economic background to the projections.'	Home Builders Federation	Comments noted	None required
'Help to Buy' initiative has had significant impact on housing market with 6,000 people using scheme to buy a house, predominantly first time buyers.	Home Builders Federation	Help to Buy sits outside of the land use planning process. Any uplift in house sales will be reflected in the updated evidence base that will be used in developing the replacement LDP.	None required.
Table 1 & 2 could also include the Welsh Government Household Projections figures for 2011 which were published in 2014 as this would help to demonstrate how the figures have changed over time.	Home Builders Federation	Agreed. Table in Review Report and Information Paper Building Sustainable Communities to be updated.	Tables in Review Report and Information Paper Building Sustainable Communities updated.
Figure 1 a note should be added to explain that the housing completions figures have been significantly affected by the non-delivery of one large strategic site (Bodelwyddan) on which the plan was heavily reliant.	Home Builders Federation	The longer lead in time than anticipated in commencement on the KSS has impacted on housing delivery. Around 600 units were anticipated to have been built by the end of 2017 which whilst significant is not solely responsible for under delivery of housing numbers across the County.	None required.
4.13 There are other factors that could affect the housing numbers such as, economic growth ambitions, North Wales Growth Deal and the failure of the plan to deliver over the previous plan period creating a backlog of demand. Such factors should be included and explained in this paragraph. Or be dealt with separately in more detail in separate paragraphs. Note should be taken of The North Wales economic ambition board report; A Growth Vision for the Economy of North Wales July 2016 and The Cardiff Capital Region City Deal Growth & Competitiveness	Home Builders Federation	These documents will inform the replacement LDP.	None required.

<p>Commission which makes recommendations relevant to North Wales regarding the need for an effective housing market to aid labour productivity.</p>			
<p>4.23 The HBF strongly objects to the statement 'The implementation of the LDP Growth Strategy primarily suffers from the significantly low number of new homes coming forward through the planning system.' and consider that this requires further explanation. All new homes need planning, but there are lots of other reasons why planning applications may never get submitted, these include; land owners not being willing to release land, viability issues, lack of market demand, overly restrictive planning polices deterring potential developers, lack of bank finance. These also need to be explained and considered. An example of this relates to the education contributions requested on development sites which members have highlighted a number of times as having a significant impact on the viability of sites in the Borough.</p>	<p>Home Builders Federation</p>	<p>The lower levels of housing delivery are a statement of fact as shown in the annual Joint Housing Land Availability Studies. Many of the causes of lower levels of delivery lie outside of the LDP and planning process such as wider economic climate, high expectations of land values etc.</p> <p>In terms of required contributions, it is vital that all developments are sustainable and contribute to well-being objectives.</p> <p>Denbighshire is a County not a Borough.</p>	<p>None required.</p>
<p>4.24 The HBF strongly objects to the statement 'Since previous WG population and household growth projections were grossly overestimated', and do not consider this is for the Council to say as these figures were considered to be correct at the time and where based on the relevant factors at the time. It may be fair to say these factors changed and this was then allowed for in the more recent projections which changed. Each set of projections will take account of different factors, the point that HBF and other have previously made is that if the period on which the projections are based includes a down turn in the economy future plans based on these</p>	<p>Home Builders Federation</p>	<p>This is a statement of fact as the population and household growth predicted has not materialised.</p> <p>Revised projections will form part of the evidence base for the replacement LDP.</p>	<p>None required</p>

projections will effectively plan based on a continued failure in the market. Ultimately the HBF suggests that the plan should provide for future need and growth as well as taking account of current need and historical under delivery. The figures alone cannot be blamed for the failure of the plan to deliver. Whilst this latest WG projections generally indicates a need for less housing across Wales than the previous 2011-based series they supersede, slavishly adhering to these updated figures will be at the cost of economic growth. In reality the true level of housing need in Welsh local authorities will inevitably be higher than indicated by the 2014-based household projections.			
5.8 This paragraph should be reworded as the reference to the past completions/ build rate is misleading as this is a method of calculation not allowed by the TAN1 - Joint Housing Land Availability Studies so why reference it? The HBF would contend that although there may be sufficient land allocated this does no guarantee development will take place. It could alternatively be concluded that the wrong land in the wrong places has been allocated by the previous plan. Denbighshire are not the only LPA in Wales to not be able to show a five year land supply, in fact only 6 of the 24 were able to in 2016 with only Snowdonia National Park able to in North Wales.	Home Builders Federation	Past build rates are a valid source of evidence that will be used to inform the replacement LDP.	None required
The document lacks a section explaining how previous allocations which have not come forward to date will be reviewed before being 'rolled over' into the new plan.	Home Builders Federation	This will be addressed once work commences on the replacement LDP.	None required
Representation on the LDP Review Report (August 2017) made by Mineral Products Association Ltd	Mineral Product Association	Observation: It would appear from the MPA response that the purpose of the Review Report has been misunderstood: It is a first step in the	None required

		<p>review process and sets out what needs to be reviewed and why. The Information Papers, which were published alongside the LDP provided a link between the evidence base and the LDP main document and maps, explaining how the policies and allocations were arrived at. The papers have been updated to identify significant contextual change and highlight where policies have met relevant trigger points within the Monitoring Framework but do not detail how different policies will change as a result of these changes since this is not the role of the Review Report stage. Some of the comments made by the MPA relate to the way in which the LDP was developed and how the policies/mapping were arrived at. During the Review there will be opportunity for the MPA to fully engage with the Local Planning Authority which is welcomed by officers.</p>	
<p>Para 1.2 Reference is made to development needs. Whilst it is appreciated the list is not exclusive, it would be worth referencing minerals as they are critical to most if not all other forms of development</p>	<p>Minerals Product Association</p>	<p>This is not a conclusive list.</p>	<p>None required</p>
<p>Paragraphs 2.7 to 2.11: Whilst we support the Councils approach and aspirations, WG will be reviewing PPW in 2018 together with a NDF consultation in March 2018. In November 2017, there will be a planning consolidation Bill which will be followed by procedural guidance on Development Management and Policy. It is hoped a review of the RTS will also be forthcoming. Any review of the LDP must be flexible to incorporate reviewed policy, guidance and the consolidation of planning legislation.</p>	<p>Minerals Product Association</p>	<p>A principal reason for carrying out the LDP Review is to ensure that the adopted Plan remains compliant with legislative provisions that came into force after the adoption.</p>	<p>None required</p>
<p>Paragraph 2.10 Reference is made to larger scale issues such as housing numbers, strategic housing allocations, strategic</p>	<p>Minerals Product Association</p>	<p>Comment noted</p>	<p>None required</p>

employment sites and transport infrastructure. The raw materials and resources for such development must not be underestimated and the local plan review provides a good opportunity for this to be incorporated.			
Paragraph 4.10: This states “The Denbighshire LDP was adopted in 2013; six years have passed since the start of the plan period.” This is a little confusing. The plan date runs from 2006 – 2021. If the plan was adopted in 2013, the period from 2006 to 2013 is 7 years from commencement. However, we are now 11 years since the beginning of the plan period (2006 – 2017) or if we are looking at the period from when the plan was adopted (2013 – 2017) this period is 4 years.	Minerals Product Association	The DCC LDP was adopted in June 2013 which is less than 6 ½ years from the start of the Plan period; hence six years. Clarification to be provided in amended paragraph.	Paragraph reworded to read: The Denbighshire LDP was adopted in June 2013 which is less than seven years since the start of the Plan period in 2006. Figure X shows the annual housing completions in comparison with the growth levels set out in the LDP.
Paragraphs 4.21 to 4.23: This states that “Table 4 indicates that the delivery of houses has been very much in line with the settlement hierarchy identified in the adopted LDP” We don’t believe Table 4 does show this. There have been no houses delivered on the key strategic site, Bodelwyddan; and the percentage of houses delivered in open countryside exceeds that for villages and hamlets, although there may be policy compliance considerations here.	Minerals Product Association	Table 4 sets out housing completions in line with the LDP spatial strategy since 2006; i.e. development proposals in the open countryside were approved under a different local policy until June 2013. Bodelwyddan Key Strategic Site outline planning permission including Section 106 Agreement were issued in March 2016.	None required
Paragraph 5.8: This states “There is sufficient land available for residential development but delivery is dependent on developers. The industry has not taken up the land available to deliver as many houses per year as required by the Plan; partly due to viability concerns.” The review should consider why delivery is not being achieved. Are the allocated sites in the right place; are there any constraints, planning or otherwise; are there infrastructure issues?	Minerals Product Association	There will be a stronger focus on development deliverability and viability in assessing future candidate sites.	None required

<p>Paragraphs 5.21 – 5.23: It is important that the review also considers non- aggregate production, such as, but not limited to, building stone for architectural purposes. Further the safeguarding of mineral resources and minerals infrastructure must be an integral part of the review. Most notable, is development on brownfield sites where proximity to existing infrastructure may impede lawful operations</p>	<p>Minerals Product Association</p>	<p>Noted. The minerals to be safeguarded were developed as part of the LDP and selected on the basis of the evidence available at the time. Information regarding the location of building stone is limited: There is information regarding historic sites which have been worked for building stone but the underlying mineral varies across the County (limestone, sandstone and so on). The local authority welcomes the support of the MPA in reviewing the suitability of the safeguarding policy, however, it is essential that any changes are based upon robust evidence.</p> <p>As detailed within the Review Report, the review of national policy will have a potential influence on the safeguarding policy.</p> <p>Paragraph 5.23 confirms that the implications of additional allocations required as part of the LDP Review will need consideration against these (minerals) policies. This would include safeguarding.</p>	<p>None required</p>
<p>The introduction and overall structure of the report is a little confusing and unclear. It should be made clear in the introduction: (1) That the review has identified the need for a FULL REVISION of the LDP, which effectively, is a replacement of the adopted LDP. (2) That the report fully explains the reasons behind this requirement/decision.</p>	<p>Wrexham County Borough Council</p>	<p>Comment noted</p>	<p>Introduction to be reworded to provide greater clarity on the purpose of the document, and restructure of individual paragraphs.</p>
<p>Paragraph 5.12 seems to refer to the needs of the Gypsy and Traveller community, both for a residential site and transit/stopping site as a regional issue. The transit/stopping site may be a regional issue, but the need for a residential site is unlikely to be. Should be some reference of any intentions to work collectively with other North Wales authorities in relation to providing a transit/stopping site.</p>	<p>Wrexham County Borough Council</p>	<p>This reference has been removed from the Review Report.</p>	<p>This reference has been removed from the Review Report.</p>

Appendices but should be referenced in the report somewhere, particularly if they are serving to provide further evidence for a FULL REVISION of the LDP	Wrexham County Borough Council	Comment noted.	References to appendices I and II to be inserted in the main text body.
LATE REPRESENTATION Concerned that LDP boundaries do not match parish boundaries, especially Cwm Road Dyserth.	C Scholl & S Edwards	LDP development boundaries do not aim to follow town & community council boundaries.	None required.
LATE REPRESENTATION Hamlets policy not sensible or achievable. Brownfield sites should be used for development rather than rural green field ones.	C Scholl & S Edwards	The effectiveness of the hamlets policy in delivering homes in rural areas will be reviewed as part of the process of preparing the replacement LDP.	None required.
Information papers			
Promoting a Sustainable Economy			
Table 7 identifies that 26ha of the 50 ha in the LDP was allocated at Bodelwyddan and that none has come forward on this site. The Council did not allocate any further employment land in Rhyl and Prestatyn as it was identified that demand could be satisfied through the use of existing sites. The reason why the sites are vacant may be that they are unattractive to modern business requirements, the release of these unwanted employment sites for higher value uses should be considered and encourage in accordance with Paragraph 7.5.1 of PPW.	Hourigan Connolly for Coach Road Developments Ltd	Existing employment sites and respective land allocations to be reappraised as part of the forthcoming LDP employment land review.	None required
The assumption that employment need can be met within existing stock cannot be claimed without an employment land review being undertaken which assesses the quality and quantity of the existing employment stock. Without this information, it is not	Hourigan Connolly for Coach Road Developments Ltd	Existing employment sites and respective land allocations to be reappraised as part of the forthcoming LDP employment land review. Local planning authority may reconsider its position on the basis of newly emerging evidence.	None required

possible to know if there is a requirement for existing offices/ employment areas to be upgraded or whether the stock might not be suitable to meet changing market needs.			
The Council are yet to undertake their updated Employment Land review as is highlighted within paragraph 3.3.24 of the Information Paper. In order to ensure that economic growth does occur within this plan period our client supports the Council in undertaking a review and reserves the right to comment on this document.	Hourigan Connolly for Coach Road Developments Ltd	Comment noted	None required
Welcome Retail Study and reserve right to comment on the study.	Hourigan Connolly for Coach Road Developments Ltd	Comment noted	None required
Paragraph 3.6.1: The statement does not reflect PPW Chapter 14: Minerals. PPW requires that LPAs provide positively for the safeguarding and working of mineral resources to meet society's needs. There is however a requirement for LPAs: <ul style="list-style-type: none"> • to provide for an adequate supply of minerals that society needs now and in the future, together with protecting and improving amenity; • to protect things that are highly cherished for their intrinsic qualities, such as wildlife, landscapes and historic features; and to protect human health and safety by ensuring that environmental impacts caused by mineral extraction and transportation are 	Minerals Products Association	Seeking to ensure development is sustainable, minimising the consumption of resources is a fundamental aim of national policy. Paragraph 12.6.3 of PPW sets out that development plans should seek to secure opportunities to reduce or recycle waste as part of the design, construction and operation of new buildings. Paragraph 14.7.2 of PPW deals with the recycling of construction and demolition wastes as well as mineral and industrial wastes. Minerals Technical Advice Note 1 also recognises the importance of encouraging the efficient use of minerals and maximisation of alternative materials as aggregates. Section E of MTAN 1 expands upon how this may be achieved. It is proposed as part of the Review	None required

<p>within acceptable limits; and to secure, without compromise, restoration and aftercare to provide for appropriate and beneficial after-use;</p> <ul style="list-style-type: none"> • to help conserve non-renewable resources for future generations through efficient use, recycling and waste prevention; to protect renewable resources from serious harm or pollution; and to promote the use of appropriate alternative materials; • to ensure an adequate supply of minerals that are needed at prices that are reasonable; and to safeguard mineral resources for future generations. <p>We would seek clarification of the LPA's proposed measures to reduce the need for minerals and the precise details of the sustainable construction practices referred too.</p>		<p>of the LDP that Policy RD1 is reviewed to address this requirement.</p>	
<p>Paragraph 3.6.6: This paragraph proposes a review of local plan policy for the delivery of sand and gravel reserves, as no sites have been brought forward. We would support this approach and would be happy to discuss this with the LPA.</p>	<p>Minerals Products Association</p>	<p>Support welcomed</p>	<p>None required</p>
<p>Paragraph 3.6.9: This paragraph identifies a sieve approach which indicate where development will be excluded. In view of the lack policy failure to deliver sites, these criteria may need to be reviewed.</p>	<p>Minerals Products Association</p>	<p>Paragraph 3.6.9 identifies the approach that was taken during the development of the LDP. Paragraph 3.6.6 of the document recognises that this policy has not delivered and needs to be reviewed.</p>	<p>None required</p>

<p>Paragraph 3.6.11: This paragraph states that visual impact is a constraint. We do not believe visual impact is a constraint per se, but is a matter which needs to be considered during the application process. It is evident that the visual effects of mineral working can be mitigated through appropriate measures and is part of the overall planning balance as to whether or not proposals are acceptable.</p>	<p>Minerals Products Association</p>	<p>Large areas of the County are designated for their landscape quality. These areas coincide with the distribution of mineral of economic importance, including sand and gravel and limestone. It is therefore considered appropriate to highlight the constraint/s as relevant to mineral extraction.</p>	<p>None required</p>
<p>Paragraphs 3.6.19 -3.6.22: Table of Safeguarded Minerals and subsequent text. We question the selection process to determine which minerals are excluded from this table. Of particular note is the failure to safeguard building stone, coal, metalliferous minerals and silica rock. The LPA must provide a clear and detailed consideration to justify this table. Sterilising mineral resources is not sustainable.</p>	<p>Minerals Products Association</p>	<p>This section details the approach to selecting areas for safeguarding during development of the LDP. As detailed above the approach taken was based upon information available at the time.</p> <p>Coal: A deposit of tertiary coal runs from Prestatyn in the north to Dyserth. The majority of the deposit is already sterilised by the settlements of Prestatyn, Meliden and Dyserth. There is a small, isolated deposit of tertiary coal to the west of Trefnant, close to the Elwy Woods SSSI. MTAN 2 requires primary and secondary resources to be safeguarded and allows for the exclusion of designated sites and settlements.</p> <p>The conclusions made with respect to the other mineral types are considered to remain of relevance. Nevertheless, if the MPA has further evidence the LPA would welcome its submission and consider it as part of the review.</p>	<p>None required</p>
<p>Paragraph 3.6.23: Safeguarding - We support the LPA's statement that a review of the safeguarding approach will be undertaken as</p>	<p>Minerals Products Association</p>	<p>There are no ports and no freight terminals within Denbighshire. Quarries within Denbighshire are reliant on road.</p>	<p>None required</p>

part of the LDP review and would suggest that the review includes minerals infrastructure.			
Paragraph 3.6.24: Buffer zones - This section is a little confusing and we would seek the LPA's clarification on what it is seeking to achieve.	Minerals Products Association	This paragraph seeks to explain the rationale behind not safeguarding urban areas, taking into account the fact that redevelopment of large sites can offer potential opportunities for prior extraction.	None required
Building Sustainable Communities			
<p>Although our client supports the broad approach taken by the Council towards brownfield sites, this may be a contributing factor to why delivery levels are not as high as required. The Council clarify, within Paragraph 3.9.1 of the Appendix 1: Issue Paper: Building Sustainable Communities, the position of the brownfield sites named above and allocated within BC 1:</p> <p><i>“Rhuddlan Triangle: A site development brief was prepared and adopted for this site and a new supermarket is currently under construction on part of the site.</i></p> <p><i>Former Ocean Plaza, Rhyl: site currently under construction for a major new retail development for Rhyl.</i></p> <p><i>Prestatyn Former Gas Works: part of the site is currently being redeveloped for a supermarket.”</i></p> <p>apparent that the Council failed to identify a sufficient number of deliverable sites for new housing, to allow for ‘slippage’ on sites; or for some of the less viable sites to stall or switch to alternative higher value uses, such as those</p>	Hourigan Connolly for Coach Road Developments Ltd	The independent Inspector appointed to Examine the soundness of the current LDP considered that sufficient land was allocated to meet housing need. The lower levels of housing delivered are as a result of factors such as the depressed housing market and unrealistic expectations of land values from land owners.	None required

highlighted above. For example, the Former Ocean Plaza site was allocated for 230 dwellings, which are no-longer included within the supply. This failure to plan for flexibility and changing circumstances has contributed to reduced housing delivery within the County.			
Valuing Our Environment			
AONB Policy VOE2 is not mentioned in Table 4 of the information paper relating to 'Valuing our Environment' which highlights areas for review.	AONB JAC	As the policy VOE2 is performing as expected, it is deliberately not included in Table 4 relating to the LDP Annual Monitoring Report. Appendix 2 of the main Review Report highlights contextual changes that may require policy changes.	None required
Sustainability Appraisal			
We note the confirmation that the replacement Plan will need to comply with the requirements of the Well-being of Future Generations (Wales) Act and that the updated SA/SEA Assessments will also need to be revised accordingly.	Natural Resources Wales	Comments noted. Consideration will be given to amending the structure of the Sustainability Appraisal report to correspond with the Well-Being of future Generations (Wales) goals. This will be subject to a separate consultation.	None required currently.
We note that the Annual Monitoring of the SA Framework concludes that the LDP is delivering in terms of sustainable development in line with SA objectives and that therefore it is considered that the SA objectives all remain relevant to the current adopted LDP. No developments have been granted which have undermined the objectives set out as part of the LDP process.	Natural Resources Wales	Comments noted. NRW do not consider it necessary to amend SA objectives.	None required
We welcome that the baseline information has been updated where available and new	Natural Resources Wales	Support welcomed. Sources of baseline information will continue to be researched and	None required

and additional data included that provides upto date baseline data to assist in monitoring and reconsidering the SA as part of the replacement LDP		evaluated throughout the process of Plan writing.	
We are satisfied with the review of relevant plans, programmes and policies that has taken place and note that the list may evolve as the plan develops.	Natural Resources Wales	Support welcomed. Agree to evolve the list as plans develop. Adoption of Denbighshire Corporate Plan (2017 – 2022) an example to be incorporated.	None required
We note the resources that have been used to identify sustainability issues.	Natural Resources Wales	Support welcomed. Resource collection will be continued throughout the process of Plan writing.	None required
NRW is satisfied with the SA Scoping Report and consider that it can be used to inform the SA Report as part of the replacement LDP.	Natural Resources Wales	Support welcomed.	None required
Habitats Regulations Appraisal			
We note that the purpose of the HRA for the replacement plan is to re-visit previous HRA' prepared in relation to the adopted plan with the aim of identifying potential changes to the relevant European sites and look at the effectiveness of previously suggested avoidance and mitigation measures.	Natural Resources Wales	Comment noted	None required
We note the confirmation that none of the local policies and planning proposals contained in the LDP have caused significant effects on any European site since plan adoption, although further investigations will be carried out to explore opportunities to improve air quality in the South of the County, especially reduction of nitrogen deposits.	Natural Resources Wales	Comment noted	None required
We welcome that fact that the HRA of the replacement Plan will have regard to the	Natural Resources Wales	Comment noted	None required

proposed extension of the 'Bae Lerpwl / Liverpool Bay' SPA as well as consider the new information on 'Coedwigoedd Dyffryn Alun / Alyn Valley Woods' SAC. It is also noted that these changes may have an effect on local policy and the potential forms of land use			
NRW is satisfied that the HRA exercise has set the framework for future HRA work with regard to the replacement plan.	Natural Resources Wales	Comment noted	None required
Delivery Agreement			
Welcome consultation and happy to be involved in future stages	Denbigh Civic Society	Support Welcomed	None required
Consultees – Appendix 3 lists DECC which was dissolved in July 2016 so should be removed	Ian Gardner	Reference is from the LDP Manual (2015). Reference updated to Department for Business, Energy and Industrial Strategy	Delivery Agreement amended.

<p>Consultees – I think it is appropriate to include electricity and gas network operators but not those (such as Ecotricity and EON) that are just suppliers. Alternatively you should include all utility suppliers and intermediaries.</p>	<p>Ian Gardner</p>	<p>This entry will be simplified to those” to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989” and those ” to whom a licence has been granted under section 7(2) of the Gas Act 1986”</p>	<p>Delivery Agreement list of specific consultees amended.</p>
<p>Consultees – You may wish to include Community Housing Cymru as they represent Housing Associations in Denbighshire and given the social housing component of the LDP Review, perhaps they should be specifically included in the list of consultees.</p>	<p>Ian Gardner</p>	<p>Agree</p>	<p>Community Housing Cymru added to general consultee list at Appendix 3 to the Delivery Agreement and the LDP database.</p>

<p>Consultees – Dwr Cymru are included twice in the table in Appendix 3 as is the Environmental Services Association (3x), Gypsy Council etc. Appendix 3 could do with some checking for duplicates and a tidy up generally</p>	<p>Ian Gardner</p>	<p>Some organisations represent a range of sectors which is why they appear more than once.</p>	<p>None required.</p>
<p>Consultees – Organisations that represent specific businesses should be matched by any opposition groups and competitors. The reference to British Wind Energy (their old name) is a good example and views should be sought from organisations that oppose wind energy as well. Given the significance of Wylva, there should also be an opportunity for the Nuclear industry to comment also.</p>	<p>Ian Gardner</p>	<p>Reference is from the LDP Manual (2015). The Delivery Agreement will be updated to reflect new name of RenewableUK.</p> <p>Nuclear Industry Association and Campaign for Nuclear Disarmament added to LDP Database</p>	<p>Delivery Agreement amended</p>

<p>Consultees – It is not clear why the Centre for Ecology and Hydrology merits inclusion as a specific consultee as it is a commercial organisation based in England</p>	<p>Ian Gardner</p>	<p>Reference is from the LDP Manual (2015).</p>	<p>None required</p>
<p>Consultees - Environmental groups at national and regional level again should be carefully chosen as you risk consulting with protest organisations and taking politically determined views into account in an unbalanced way.</p>	<p>Ian Gardner</p>	<p>The consultee lists are not exhaustive and the LDP database contains many more entries than are listed in the Delivery Agreement. Any person or organisation not currently included on the database can request inclusion at any time in the process.</p>	<p>None required</p>

<p>Group are happy with the documents.</p>	<p>Glyn Avenue Residents Group</p>	<p>Support welcomed</p>	<p>None required</p>
<p>The Delivery Agreement timetable for the replacement LDP must ensure that adoption is Spring 2021, otherwise the Council will be further compromised by having to adhere to an outdated and failed Local Development Plan.</p>	<p>Russell Reeve</p>	<p>The Delivery Agreement timetable sets out that the replacement LDP should be adopted before the current LDP Plan period expires.</p>	<p>None required.</p>

<p>I note that Candidate Site submissions are to be invited in December 2017, please provide the appropriate criteria.</p>	<p>Russell Reeve</p>	<p>A call for candidate sites will take place following approval of the Delivery Agreement by Welsh Government. The call for sites and assessment criteria will be well publicised and everyone on the LDP database will be notified.</p>	<p>None Required</p>
<p>The Draft Delivery Agreement for the replacement LDP is also supported, but the committee is disappointed that the Clwydian Range and Dee Valley AONB Joint Committee and Partnership are not specifically listed as a future consultee on the replacement plan. It is noted that the lists are not exhaustive, but given that the AONB is an active participant in planning matters, the committee is of the view that it should be explicitly recognised as an organisation to be consulted.</p>	<p>AONB JAC</p>	<p>Agree.</p>	<p>Clwydian Range and Dee Valley AONB Joint Committee and Partnership added to general consultation list in Appendix 3 of Delivery Agreement</p>

<p>Lack of consensus or agreement on key issues is stated as being a Low risk in Appendix 2. Experience of the current LDP indicates this should be afforded a higher level of risk.</p>	<p>Anwyl Construction Co Ltd</p>	<p>Agree.</p>	<p>Change to 'Medium Risk' in Appendix 2.</p>
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