



Denbighshire Local Development  
Plan 2018- 2033

DRAFT PREFERRED STRATEGY Date XX



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## FOREWORD

As Lead Member for Highways, Planning & Sustainable Travel I am very pleased to present to you the draft Preferred Strategy for the Local Development Plan (LDP) 2018 – 2033. This will replace the existing LDP 2006 – 2021 once adopted.

This document represents the first formal stage in producing the LDP. It presents for consultation, the suggested overall levels of growth, and, in broad terms, where that growth will go within the County. Key policies are also included and these will form the guiding principles for development in the future and will provide the basis for the final LDP.

The draft LDP Preferred Strategy has been developed under the guidance of the Strategic Planning Group within the Council and also in discussion with a range of community representatives and other key partners. We have considered how much development Denbighshire needs to support its communities and sought to balance this alongside providing robust protection for our outstanding cultural and environmental qualities.

A significant number of legislative Acts, plans and strategies have informed the development of the Preferred Strategy including The Wellbeing of Future Generations Act 2015; the Environment (Wales) Act 2016; the Conwy/Denbighshire Wellbeing Plan and the Denbighshire Corporate Plan. We want to ensure that Denbighshire is a sustainable place to live, work and visit and believe that the LDP is one of the key ways to achieve this in practice.

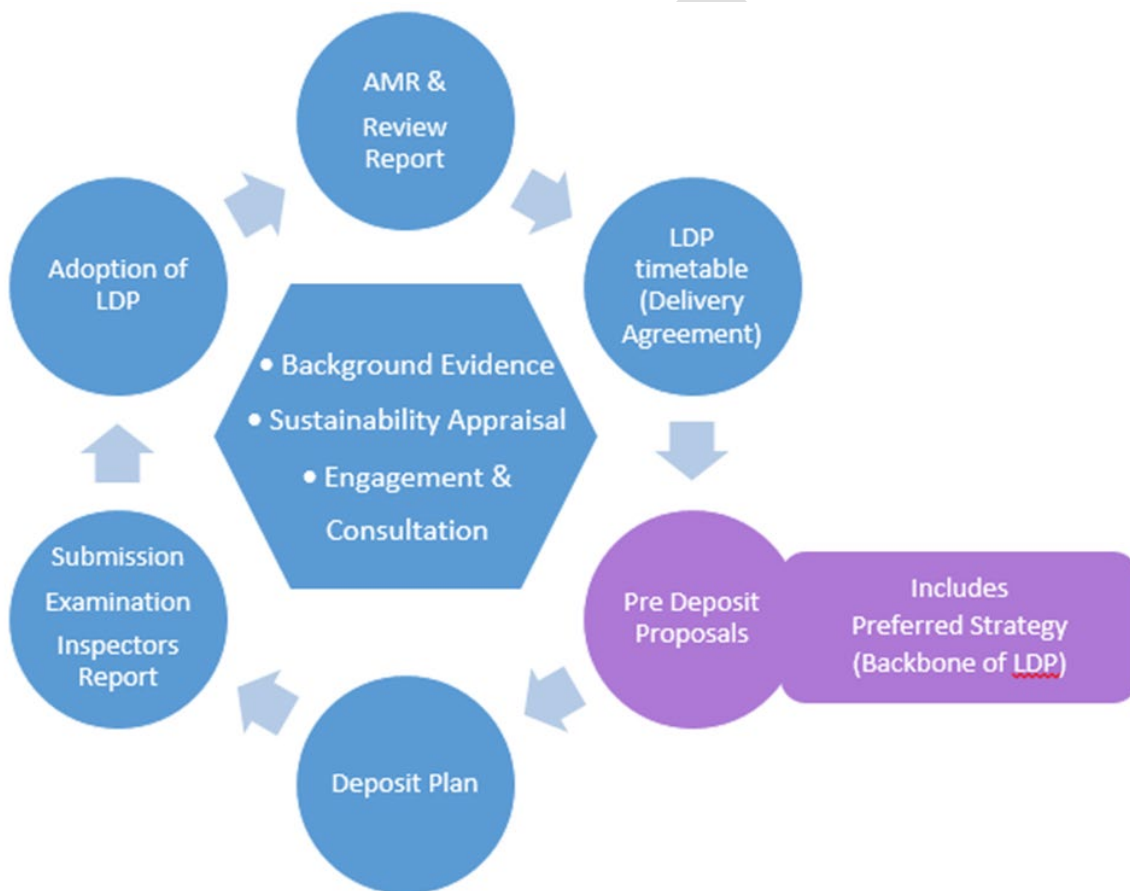
The draft LDP Preferred Strategy is only the first stage in the process. This public consultation represents an opportunity for everybody to be involved in influencing the LDP. We therefore urge you to respond to the proposals set out and ensure that your views are known in determining the future of your County.



**Councillor Brian Jones, Lead Member for Highways, Planning & Sustainable Travel 2019**

# 1. Introduction

- 1.1 The new Denbighshire Local Development Plan (LDP) will provide the framework for land use planning in the County up to 2033. The adopted (LDP) ends in December 2021 and in order to direct development in line with the needs of Denbighshire a replacement is required.
- 1.2 National legislation and policy specifies the process for producing an LDP. This includes having consideration as to the delivery of the adopted LDP through the Annual Monitoring Reports (AMR), the current economic, social and environmental situation in the county by way of background evidence, as well as national and local, plans, policies and programmes. This process is illustrated in Figure 1.1 below.



**Figure 1.1: LDP Process Diagram (adapted from the Welsh Government LDP Manual)**

- 1.3 The LDP aims to deliver a framework for sustainable development in Denbighshire, aligning the social, economic and environmental needs of the county. The framework is assessed by undertaking a Sustainability Appraisal (SA) and through public consultation.
- 1.4 Sustainability and engagement are central to the process of developing an LDP, as is ensuring that there is evidence to prove that the aspiration and ambition of the LDP is realistic and deliverable.

- 1.5 This document sets out the Draft Preferred Strategy for the new LDP. A Preferred Strategy is required as part of the Pre-Deposit stage of developing the LDP and is effectively the backbone of the LDP, setting out the levels and spatial distribution of development growth, at a high level, for the plan period. Currently this Preferred Strategy is Draft as the Council recognises the importance of consultation and welcomes constructive feedback.
- 1.6 Opportunities and challenges that will drive change and need to be considered in the LDP have been utilised to create the Vision, as well as setting the objectives for the LDP. The issues and objectives have also been considered in light of national and local legislation, plans, policies and programmes. These are described in Sections 3 and 4 of this report. Consideration of how they relate to Welsh Government's Well-being Goals, Denbighshire's Well-being Plan and Corporate Plan can be seen at Appendix 1.
- 1.7 The process of developing the Draft Preferred Strategy can be seen in Figure 1.2 below.



**Figure 1.2: Preferred Strategy Process Diagram**

- 1.8 Section 5 of this report sets out options on the level of development growth in the county described in terms of housing and employment. An indication of the preferred level of growth is provided having undertaken consultation with key stakeholders and Members as well as a Sustainability Appraisal.

- 1.9 Section 7 describes options as to how development should be distributed throughout the county and again indicates a preference. These spatial options have been informed by the settlement hierarchy which is set out in Section 6.
- 1.10 Key policies setting out the overarching principles for future development are specified in Section 8. These will be developed at a later stage into detailed policies for use in determining planning applications and appeals.
- 1.11 The key background evidence that has been used to develop this Draft Preferred Strategy is:-

| Background papers                              | Purpose   |
|--|---|
| Background paper on Growth Options             | Provides a methodology and options for development growth in Denbighshire.  |
| Background paper on Settlement hierarchy       | Assesses settlements so that they could be categorised into tiers and develop a hierarchy.  |
| Background paper on Spatial Options            | Provides options for distributing development in Denbighshire.  |
| Well-being Impact Assessment                   | Assesses the Preferred Strategy against Welsh Government Well-being goals.  |
| Sustainability Appraisal (SA)                  | Assesses the significance of economic, social and environmental impacts of the Preferred strategy.  |
| Habitats Regulations Appraisal (HRA)           | Assesses the likelihood of any significant effects arising from plan elements on the qualifying features of internationally designated sites of nature conservation and their respective conservation objectives. |
| Review Report                                  | Assesses the adopted LDP, the current economic and social situation in Denbighshire and concluded that there was a need for a Replacement LDP.  |
| Annual Monitoring Reports                      | Monitor the progress of the adopted LDP.  |
| Background evidence                            | Purpose   |
| Employment Land and Economic Growth Assessment | Assesses the demand, need and availability of employment land in Denbighshire.  |
| Local Housing Market Assessment                | Assesses the demand and need for housing, including affordable housing, in Denbighshire.  |
| Retail Study                                   | Assesses the retail catchment areas and future potential spend and growth in retailing Denbighshire.  |
| Town Centre Health Check                       | Assesses the vitality of town centres.  |
| Joint Housing Land Availability Study          | Indicates the availability of housing land locally and regionally.  |
| New Housing Occupancy Survey                   | Undertaken jointly with Conwy County Borough Council it allows the Council to understand the future housing needs and the need for facilities.  |



- 1.12 A 'Call for Sites' has been held to allow landowners and others to put forward sites that they wish to have included in the LDP. All the sites received are listed in the Candidate Sites Register. Submission of a candidate site is not a guarantee of inclusion within the LDP however, and an assessment will be made of each as to their suitability and compliance with the Preferred Strategy. The Candidate Site Register accompanies this Draft Preferred Strategy.

## Your Comments

- 1.13 Denbighshire County Council would like to hear your views on the LDP Preferred Strategy and we will be consulting on this document from **xx to xx**. All consultation documents are available on the Council's website, and copies are available for inspection during normal opening hours at Denbighshire's Council offices and libraries. Any comments should be made using the Council's Consultation Portal or the consultation response form provided.
- 1.14 The closing date for submission of comments on the Denbighshire LDP Preferred Strategy is **xxxxx**. Please forward your comments to:
- Strategic Planning and Housing  
Denbighshire County Council  
PO Box 62, Ruthin, LL15 9AZ
- Email: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)  
Website: [www.denbighshire.gov.uk/ldp](http://www.denbighshire.gov.uk/ldp)
- 1.15 Please contact the Strategic Planning and Housing Team if you require further information and advice by emailing: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk) or contact us by phone on Telephone: 01824 706916.

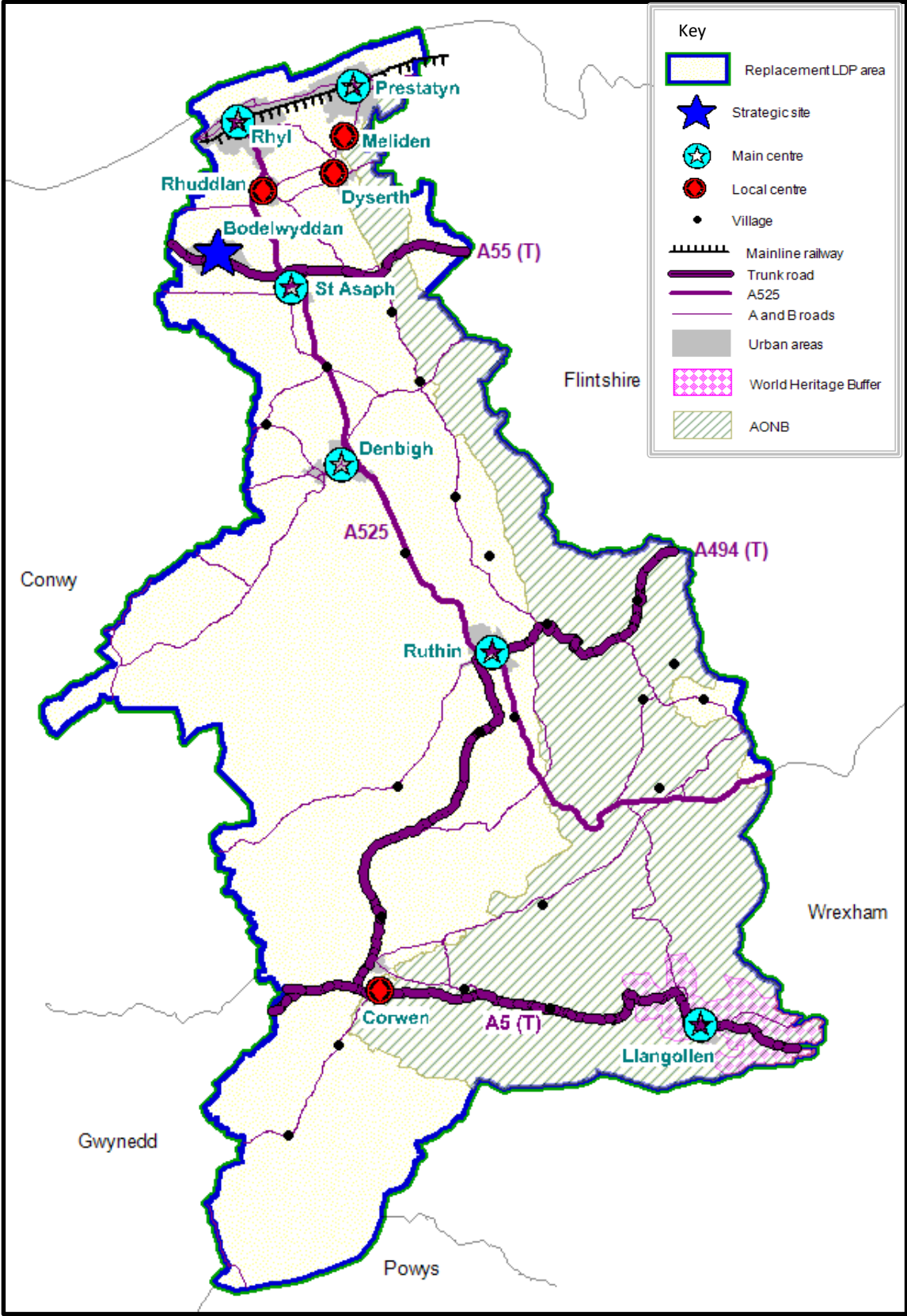
## 2 Strategic context

### 2.1 Profile of Denbighshire

- 2.1.1 Denbighshire is a largely rural authority situated in the North East of Wales which borders with five (5) other local authorities and the Irish Sea. It has an area of 844sq.km. In 2011, the population of Denbighshire was 93,734, an increase from the previous Census which was 93,065. A high proportion of the population is clustered around the two main coastal towns of Rhyl (approx. 25,000) and Prestatyn (approx. 20,000) the remainder are scattered throughout small towns and villages across a rural area. More than 60% of the population live to the north of St Asaph.
- 2.1.2 The County has a high quality built and natural environment with numerous listed buildings, conservation areas, Scheduled Ancient Monuments, and protected wildlife species and habitats. Many of these have national or international recognition and protection status, such as the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) and the River Dee which is designated as Special Area of Conservation (SAC) by the European Union. In particular, the area around the Llangollen Canal in the south-east of Denbighshire is designated by UNESCO as a World Heritage Site.
- 2.1.3 Welsh culture and language is an integral part of the make-up of Denbighshire. More than 24.6% of the population speak Welsh (Census 2011), and this proportion rises to over 60% within many rural communities.
- 2.1.4 There are good road transport links including three national trunk roads (T). The A 55 (T) is an important transport route for the coast in North Wales running east / west and providing links to Ireland. The A5 (T) joins the A55 at Bangor and runs south-east down to Shrewsbury where it joins the M54 and services the South of the county. The A494 (T) runs east / west from the M56 around Chester to Ruthin and Corwen connecting the county to Dolgellau. The A525 runs from Rhyl in the north to Llandegla in the south and onto Wrexham and Newcastle under Lyme.
- 2.1.5 Given the rural nature of the county, many residents are reliant on car use for commuting and accessing services although the North Wales Coast Mainline provides direct rail links to Holyhead (Dublin) to the north west and Manchester/ London to the south east.
- 2.1.6 The key characteristics of the county can be seen in the map below.



# Denbighshire's Character Map



### 3 Key issues and challenges for Denbighshire

#### 3.1 Key issues and challenges

- 3.1.1 Looking forwards to 2033, the key issues and challenges which need to be addressed through the Preferred Strategy and LDP are set out below and we need to plan for:

|  |
|--|
| <b>The need for market housing, affordable housing and the need to secure rural housing to meet future requirements</b>  |
| <b>Potential impacts on Welsh language and culture need to be assessed and the LDP Strategy, allocations and policies should protect, support and enhance</b>  |
| <b>The need to continue to protect existing open space and look at options for delivery of new provision.</b>  |
| <b>Need to agree position with the minerals industry regarding areas of search or allocations.</b>   |
| <b>Provision for renewable energy generation</b>   |
| <b>The protection and enhancement of the natural, built and historic environment.</b>  |
| <b>Ensure that infrastructure capacity is available or is provided in relation to new development.</b>   |
| <b>Provision for waste management.</b>   |
| <b>Need to deliver serviced strategic employment land – Strategic Site, Growth bid.</b>  |
| <b>Need to site local employment sites where they will be sustainable and not subject to pressure to release for other uses.</b>   |
| <b>Ensuring that rural employment sites are protected where practical and that policies are flexible enough to support the rural economy whilst still protecting our high quality natural and built environment.</b> |
| <b>Continue to develop quality tourism products.</b>   |
| <b>Consideration of the role of existing town centres in addition to retailing to improve viability and long term sustainability.</b>  |
| <b>Continuing to support regeneration initiatives.</b>   |
| <b>Prioritise walking &amp; cycling routes in new developments.</b>  |
| <b>Locate development to maximise accessibility as far as constraints allow.</b>   |
| <b>Ensure that new development is directed away from flood risk areas and that the longer term implications of climate change are considered.</b>  |

## 4. LDP Vision and Objectives

### 4.1 LDP Vision

- 4.1.1 The role of the LDP Vision is to define the main purpose on the Plan and provide a framework for the Preferred Strategy and future detailed policies. The Vision distils the main priorities and drivers for Denbighshire and draws on priorities set by national policy and relevant local strategies.
- 4.1.2 The draft LDP Vision and objectives have been the subject of stakeholder engagement and feedback has influenced the final Vision and objectives below.
- 4.1.3 The LDPs' Vision is:

*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 and the high quality environment will be protected and enhanced. Life of a high quality will be maintained for all communities; with full recognition that we have a strong Welsh language and culture that should be supported and enhanced throughout the County.*

### 4.2 LDP Objectives

- 4.2.1 A number of more detailed strategic objectives have been developed which translate the Vision into a framework which sets out how the LDP Vision will be delivered and what the Plan is trying to achieve. Current LDP objectives have been reviewed and revised to reflect the goals set out in the Well-being of Future Generations Act, the Conwy Denbighshire Well-being Plan and the Council's Corporate Plan, together with national guidance and legislation.
- 4.2.2 One of the key challenges of producing a sustainable LDP is to ensure a reasonable balance between competing aims. The Plan will need to minimise potential conflicts arising from these objectives and the Sustainability Appraisal process will contribute to reducing potential areas of conflict.

#### 4.2.3 The LDP Objectives are:

|           |  |
|-----------|--|
| <b>1.</b> | <b>Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.</b>  |
| <b>2.</b> | <b>Supporting and enhancing the Welsh Language</b>   |
| <b>3.</b> | <b>Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.</b>  |
| <b>4.</b> | <b>Protecting and enhancing Denbighshire's natural, built and historic environment.</b>  |
| <b>5.</b> | <b>Supporting the provision, operation and development of infrastructure and services</b>  |
| <b>6.</b> | <b>Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.</b>  |
| <b>7.</b> | <b>Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses.</b> |
| <b>8.</b> | <b>Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.</b>  |

## 5. LDP Strategic growth options

### 5.1 Assessment of Growth Options

- 5.1.1 A key part of developing a Plan is the consideration of different options to determine the appropriate level of development the Plan should provide for and the most sustainable way to distribute this around the County. This consideration informs the selection of the preferred option, which will set the context for identifying how much development land is required for housing and employment and where that development should be located.
- 5.1.2 The growth options considered are informed by demographic and economic trends and projections, together with an assessment of the ability of the market to deliver those options. There are clearly external factors beyond the control of the Plan which may have a significant impact on growth, including the economic climate, access to development finance, growth within neighbouring authorities and capacity within the building industry. Growth levels put forward in the current adopted LDP are not being achieved and therefore a reassessment of potential growth over the next 15 years, using up to date information, is necessary to inform the development of the Preferred Strategy for the emerging Replacement LDP.
- 5.1.3 A number of options which are considered to be realistic and sustainable have been developed and tested. These options have been assessed against the key issues and challenges for the County, the LDP Vision and objectives, together with national policy guidance and local strategies. A separate Background Paper: Growth Level Options Report provides further information expanding on the methodology and considerations in assessing the various options.

| Growth Option   | Household Growth | Households to dwellings | Annual figures | Figures with 15% contingency | Employment Growth              |
|---|------------------|-------------------------|----------------|------------------------------|--------------------------------|
| <b>Option 1: Population led - 15 year migration trend</b>   | 2,050            | 2,150                   | 143            | 2,450<br>160 per annum       | Approx 750 jobs<br>5.2 ha land |
| This reflects Welsh Government 2017 population forecasts which projects forward the previous 15-year migration trend. |                  |                         |                |                              |                                |

|   |       |       |     |                        |                                 |
|---|-------|-------|-----|------------------------|---------------------------------|
| <b>Option 2: Population led – 10 year migration trend</b>   | 2,500 | 2,600 | 173 | 3,000<br>200 per annum | Approx 1,200 jobs<br>8.3ha land |
| This reflects a refinement of the Welsh Government 2017 population forecasts which projects forward the previous 10-year migration trend. |       |       |     |                        |                                 |

|   |       |       |     |                        |                                  |
|---|-------|-------|-----|------------------------|----------------------------------|
| <b>Option 3: Population led – 15 year migration trend</b>   | 3,750 | 3,950 | 263 | 4,550<br>300 per annum | Approx 2,750 jobs<br>19.2ha land |
| This reflects a refinement of the Welsh Government 2017 population forecasts which projects forward the previous 15-year migration trend. |       |       |     |                        |                                  |

|   |       |       |     |                        |   |
|---|-------|-------|-----|------------------------|---|
| <b>Option 4: Employment led</b>   | 3,000 | 3,150 | 210 | 3,600<br>240 per annum | Approx 1,300 jobs<br>6.72ha<br>8.5ha land (incl 2.24ha flexibility allowance) |
| This reflects an 'employment-led' option where the projections model is essentially run in reverse. The target of 8.5 ha (including flexibility allowance) of employment land (approximately 1,300 jobs) is derived from an option in Denbighshire Employment Land and Economic Growth Assessment 2019. |       |       |     |                        |   |

|  |       |       |     |                        |  |
|--|-------|-------|-----|------------------------|--|
| <b>Option 5: Employment led</b>  | 6,150 | 6,500 | 433 | 7,500<br>500 per annum | Approx 6,800 jobs<br>35.70 ha<br>(47.6ha land incl 11.9ha flexibility allowance) |
| This reflects an 'employment-led' option where the projections model is essentially run in reverse. The target of 47 ha (including flexibility allowance) of employment land (approximately 6,800 jobs) is derived from the recommended option in Denbighshire Employment and Economic Growth Assessment 2019. |       |       |     |                        |  |

5.1.4 The Strategic Options were subject to an engagement exercise with Members, City Town & Community Councils and key stakeholders. The above growth options were presented to demonstrate the effects of using different data sets and the impact on potential housing numbers. Growth options presented included a 15% allowance for contingency. Feedback received as part of this engagement generally preferred Option 2 (2017 based with 10 year migration trend - 2,600 dwellings/ 173 pa without contingency; 3,000 /200 per annum with contingency) with Option 3 marginally lower (2017 based with 15 year migration trend – 3,950 dwellings/ 263 pa without contingency; 4,550 dwellings/300 per annum with contingency). Whilst feedback on the options is an important consideration, the assessment of options and selection of a preferred option needs to be based on the technical merits of each option and whether it would result in a sound LDP.

5.1.5 The Growth Options considered for the Replacement LDP are all substantially lower than the growth levels projected when the current adopted LDP was being developed. The adopted LDP makes provision for 7,500 new homes over the 15 year period of 2006 – 2021 (500 pa) to meet the needs projected at the time. However, this level of

growth has not been achieved, with housing completion rates averaging 220 over the last 15 years.

5.1.5 A summary assessment of each option is set out below:

### Assessment of Growth Options

**Option 1: Population led - 15 year migration trend** (2,150 dwellings -143 per annum / 2,450 - 160 per annum with 15% contingency)

This option is an update of the official Welsh Government 2014-based projections, using the same methodology but where appropriate with data updated for the most recent year of population that is available (2017). It extends the trend period to 15 years, to match the length of the plan period, and the migration trend is based on data for the 15 years between 2002/03 and mid 2016/17.

Under this option, new dwellings requirements are low, with around 2,150 required across the plan period. This option would perform poorly in delivering market and affordable housing, potentially not meeting needs. The impact of the baby-boomer generation moving out of the working age population could undermine aspirations for jobs growth and economic aspiration. Growth in both job numbers and employment land requirements would be relatively low also, with around 750 jobs and 5.2ha of employment land provided over the plan period.

This option produces growth levels which may be too low to support future aspirations for the county, and could perpetuate the trend towards out-migration amongst young adults.

It is proposed that this option is discounted.

**Option 2: Population led – 10 year migration trend** (2,600 dwellings – 173 per annum / 3,000 - 200 per annum with 15% contingency)

This option uses many of the same assumptions as Option 1, but rather than using fixed migration totals for population growth, it uses a propensity model which calculates a likelihood of migration by age/sex based on the overall population profile. It uses a 10 year migration trend based on data for the 10 years between 2007/08 and mid 2016/17.

Under this option, there would be a higher level of population growth compared to Option 1, leading to a higher dwelling requirement – around 2,600 across the plan period – and economic growth of around 1,200 new jobs and 8.3ha of employment land however this option would perform poorly in terms of meeting housing needs, particularly the need for affordable homes.



This option sees growth within the working age population, which may better support economic aspirations. However, this may be unrealistic as it does not adequately address the other factors which may lead to out-migration and evidence of an ageing population structure. This option would perform poorly in delivering market and affordable housing, potentially not meeting needs.

**Option 3: Population led – 15 year migration trend (3,950 – 263per annum/ 4,550 - 300 per annum with contingency)**

This option is based on the same method as Option 2 but uses a 15 year (rather than 10 year) migration trend based on data for the 15 years between 2002/03 and mid 2016/17.

Under this option, there would be a higher level of population growth than Option 2, leading to a higher dwelling requirement – around 3,950 across the plan period. It also forecast a growth in the working age population, which helps match aspirations for economic growth and suggests economic growth of around 2,750 new jobs and 19.2 ha of employment land across the plan period.

This option sees growth within the working age population, which may better support economic aspirations. It also would perform better in terms of delivering market and affordable housing to meet the County's needs. However, this may be unrealistic as it does not adequately address the other factors which may lead to out-migration and evidence of an ageing population structure.

**Option 4: Employment led – 8.96ha employment land**

This option starts with a requirement of 8.96ha of employment land, as based on a forecast of labour demand in the Denbighshire Employment Land Review. The household and dwelling requirements are then calculated by using a backward iteration method to match jobs growth to population growth.

Under this option, there would be similar levels of overall growth compared with Option 3, with a dwelling requirement of 3,150/ 210 pa (3,600 with contingency - approximately 240 per annum) and 1,300 new jobs across the plan period.

This option see jobs driven in-migration, leading to growth in the working age population, which may better support economic aspirations in the county. However, this may be overly optimistic given evidence of an ageing population structure across the country.

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### **Option 5: Employment led – 47.60ha employment land**

This option uses the same method as Option 4 but is based on a trend method from past employment land take-up rates.

Under this option, there would be significantly higher levels of growth compared with all other options, giving a dwelling requirement of 6,500/ 433 pa (7,500 with contingency - approximately 500 per annum) and 6,800 new jobs across the plan period, requiring 47.6 ha of land.

This option could see jobs driven in-migration, leading to growth in the working age population, which may better support economic aspirations in the county and a more balanced population structure. However, this may be overly optimistic given evidence of an ageing population structure across the country. The levels of growth envisaged are high and could deliver higher numbers of affordable housing but may not be deliverable or sustainable. This level of employment land proposed is the recommended approach in the Employment Land and Economic Growth Assessment 2019.

It is proposed that this option is discounted.

- 5.5.6 All of the above options represent much lower growth than that planned for in the current adopted LDP and reflect lower Welsh Government population and household projections. One of the Council's key priorities is to ensure that everyone is supported to live in homes that meet their needs – this includes ensuring that sufficient housing is delivered to meet those needs. A low growth option would potentially not meet those needs, particularly the need for additional affordable homes. It is also important to provide a level of housing which supports economic growth.
- 5.5.7 Option 2 provides a realistic and deliverable growth option, however the housing numbers proposed are lower the average completion rates over the last 15 years and will deliver reduced levels of affordable housing. Option 3 also provides a realistic option and would deliver more affordable homes. Option 5 sets out an unrealistic housing target but presents the recommended approach for employment land in line with the recommendations of Employment Land and Economic Growth Assessment.
- 5.5.8 Following initial discussions a combined approach is proposed, with a mid-point between Options 2 and 3 suggested as a sustainable housing growth target. Further work was undertaken to develop a Preferred Growth Option, as set out below:

| Growth Option     | Household Growth | Households to dwellings | Annual figures | Figures with 15% contingency | Employment Growth  |
|-------------------|------------------|-------------------------|----------------|------------------------------|--|
| Preferred Option: | 3,100            | 3,275                   | 218            | 3,775<br>250 per annum       | Approx 1,500 jobs<br>10.5 ha<br>(14ha land incl 3.5ha flexibility allowance) |

- 5.5.9 The preferred growth option is consistent with past build rates for housing within the county. This level of growth could lead to a growth in working age population requiring a jobs growth of approximately 1,500, equating to approximately 14ha of additional employment land.
- 5.5.10 However, as indicated above, option 5 matches the recommended level of employment land stated in the Employment Land and Economic Growth Assessment undertaken by BE Group in December 2018. It is therefore appropriate to ensure provision of 47.6 hectares of employment land to meet forecasted land requirements, including a five year contingency; to provide a choice in sites catering for both the needs of local businesses and to allow for larger developments. It assists in providing employment opportunities which are required to reverse the trend of net out-migration of 16 to 29 year olds and limit the increase in the dependency ratio.
- 5.5.11 The Council's corporate priorities include creating a place where young people will want to live and work as well as having communities that are resilient, independent, connected and have access to goods and services locally, online and through good transport links. Existing employment land allocations have been reviewed and the BE Group Report recommended that the majority should be retained in the Replacement LDP, with a potential small addition in Corwen. These sites would provide approximately 68 hectares of employment land within the County.
- 5.5.12 The North Wales Economic Ambition Board (NWEAB) set out a Growth Vision for the Economy of North Wales which is supported by the Council. Looking ahead until 2035, the Strategy underlining the economic vision stresses the need for '*market responsive, well-serviced, readily available development sites that meet the needs of current and future economic sectors and clusters, especially along the A55 corridor.*' There are two sites in Denbighshire that are of importance in delivering the Vision for Economic Growth: (1) Expansion to St Asaph Business Park has been highlighted as a strategic project in support of the Vision; and (2) a mixed-use site at Bodelwyddan which will complement employment land at St Asaph Business Park and Kinmel Park in providing additional land for economic development along the A55 in North Wales.

- 5.5.13 Local employment land allocations are provided in Denbigh, Ruthin, Corwen and Llangollen. This ensures there is a choice of employment sites across the county, local businesses should be able to start up and grow in their local areas without having to transfer to the alternative sites in the north of the County. It is considered that this level of employment land provision is necessary to encourage a strong local economy, job creation and regeneration which matches the economic ambition of Denbighshire and the North Wales region.
- 5.5.14 The requirement for new homes and employment development will be met through a variety of sources of supply, including any completions after April 2018. In delivering this level of growth care will be taken to protect and enhance Denbighshire's natural, historic and built environment.
- 5.5.15 It is appropriate for jobs growth to drive the strategy whilst providing a robust housing provision that delivers on the needs of Denbighshire's residents. This strategy reflects Denbighshire's ambition whilst remaining realistic and deliverable.

### **Proposed Level of Growth**

**The Preferred Strategy will make provision for a level of growth comprising 68 ha of employment land to accommodate a forecasted land requirement of 47.6 ha. This will be supported by land for 3,775 new homes to meet a housing requirement of 3,275 dwellings.**

## 6. LDP Sustainable Settlement Hierarchy

### 6.1 Settlement Assessment

6.1.1 A fundamental role of the LDP is to consider the need for growth and development and make appropriate provision for this growth. The LDP should put forward a clear Spatial Strategy identifying where this growth should be located. An assessment of Denbighshire's settlements has been used to inform and generate options for the location of future development. The settlements considered in the adopted LDP have been reassessed for the purposes of establishing a settlement hierarchy for the replacement LDP. Settlements were assessed on a number of criteria including their size, the services they provide and their transport links. The criteria have graded the settlements and shaped the hierarchy.

6.1.2 A tiered approach (based on existing settlement limits defined in the adopted LDP) is used to group settlements with similar characteristics in terms of facilities and services. Further information is provided in the Settlement Assessment Background Paper. The settlement hierarchy is set out below:

| Category     | Definition  | Settlements   |
|--------------|---|---|
| Main centre  | Settlements with a strategic role in delivery of a variety of services and facilities.  | <ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> <li>• Prestatyn</li> <li>• Rhyl</li> <li>• Ruthin</li> <li>• St Asaph</li> </ul>  |
| Local centre | Settlements providing a more limited range of medical, education, medical, financial and retail services than the main centre. Settlements with a local role in delivery of services and facilities for surrounding settlements and the open countryside. | <ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> </ul>   |
| Village      | Smaller settlements with limited services providing services and facilities to sustain local needs.   | <ul style="list-style-type: none"> <li>• Bodfari</li> <li>• Bryneglwys</li> <li>• Carrog</li> <li>• Clawddnewydd</li> <li>• Cynwyd</li> <li>• Graianrhyd</li> <li>• Eryrys</li> <li>• Gwyddelwern</li> <li>• Gellifor</li> <li>• Glyndyfrdwy</li> <li>• Llandegla</li> <li>• Henllan</li> <li>• Llandrillo</li> <li>• Llandyrnog</li> <li>• Pwllglas</li> <li>• Llanferres</li> <li>• Trefnant</li> <li>• Tremeirchion</li> <li>• Llanarmon yn Ial</li> <li>• Llanbedr Dyffryn Clwyd</li> <li>• Llanfair Dyffryn Clwyd</li> <li>• Pentre Llanrhaeadr</li> </ul> |

|                    |   |   |
|--------------------|---|---|
| Unserviced village | Small settlements with few or no services and facilities. | <ul style="list-style-type: none"> <li>• Cwm</li> <li>• Cyffylliog</li> <li>• Maeshafn</li> <li>• Nantglyn</li> <li>• Rhualt</li> <li>• Betws Gwerfil Goch</li> <li>• Pant Pastynog</li> <li>• Aberwheeler</li> <li>• Clocaenog</li> <li>• Graigfechan</li> <li>• Rhewl</li> <li>• Y Green</li> </ul> |
| Open countryside   | All other unclassified settlements.                       |   |

## 6.2 Sustainable development patterns

- 6.2.1 Planning Policy Wales states that local service centres or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision. This policy approach, together with the Review of the current adopted LDP, the replacement LDP Vision and objectives and the settlement hierarchy has guided the development of potential Spatial Options for the replacement LDP.

## 7. LDP Spatial Options

### 7.1 Assessment of Spatial Options

- 7.1.1 The spatial options consider **where** new development should be located across the county during the life of the LDP. Three potential options were developed, taking account of the existing size and function of the county's settlements, as well as access to facilities and transport links, as presented in the settlement hierarchy. The Spatial Strategy in the adopted LDP was reviewed and has informed the development of options. These options below were presented as part of the stakeholder engagement exercise. In addition, an alternative option 4 was proposed through the stakeholder engagement.

|  |  |
|--|--|
| <b>Option 1: Serviced settlements only</b>               | This would spread growth across the county's main/local centres and villages with services/facilities. Villages without services/facilities would be allowed some limited growth.  |
| <b>Option 2: Strategic Site and serviced settlements</b> | This option focuses growth in a single major mixed-use site in Bodelwyddan (for which outline permission was granted in 2016), with lower levels of growth in the main/local centres and villages with services/facilities. Villages without services/facilities would be allowed some limited growth. |
| <b>Option 3: Strategic Site and all settlements</b>      | This option focuses growth in a single major mixed-use site in Bodelwyddan (for which outline permission was granted in 2016), with lower levels of growth in the main/local centres, villages and unserviced villages.  |
| <b>Option 4: All settlements</b>                         | This option was put forward by attendees as part of the drop in events. This option is based on Option 1 plus development in those settlements without facilities or services. This would spread growth across all of the county's settlements.  |

- 7.1.2 Option 3 (Strategic Site and all settlements) is the most similar to the strategy in the current LDP. The proposed approach to settlement categories in the new LDP is different from the current plan, meaning a direct comparison cannot be made.



- 7.1.3 Feedback received through the stakeholder engagement indicated equal preferences for Option 2 (Strategic Site and serviced settlements) and Option 3 (Strategic Site and all settlements). The paragraphs below set out a summary assessment of each option.

## Assessment of Spatial Options

### **Option 1: Serviced settlements only**

This option spreads new development across the county's towns and villages which have existing services or facilities. Settlements without services would not have land-use allocations but would have limited opportunities for growth through in-fill development or exception sites. This option directs development to sustainable settlements where residents have access to some level of facilities and away from those smaller settlements without facilities. The levels of growth in each settlement would reflect its position in the settlement hierarchy, with some flexibility to reflect local circumstances.

Under this option, all serviced settlements would have incremental growth, which may not be realistic due to physical constraints or availability of land. The levels of growth in each settlement may not be high enough to deliver additional infrastructure or benefits. It also does not recognise the role of the Bodelwyddan Strategic Site in delivering the economic aspirations of the region. It would however, direct growth to those settlements where there is access to facilities and services, which are the most sustainable locations, and would potentially help to secure the future of those facilities and services.

### **Option 2: Strategic Site and serviced settlements**

This option represents a continuation of the current strategy in the adopted LDP, with a single major mixed-use site in Bodelwyddan and with smaller scale development in the rest of the county's settlements, but only in those places with facilities/services. The justification for this strategy was that i) the greatest employment, commercial and residential demand is in the north of the county, ii) the largest percentage of the population live in this area, iii) the county's key transport links are in this area and iv) there are greater opportunities for mixed land uses and infrastructure provision in the development of large sites. This option directs development to sustainable settlements where residents have access to some level of facilities and away from those smaller settlements without facilities. The levels of growth in each settlement would be accordance with its position in the settlement hierarchy, with some flexibility to reflect local circumstances.

Under this option, the majority of new growth is directed to a single, major mixed-use site at Bodelwyddan, which is close to main transport routes,

employment opportunities and has the potential to create a sustainable development by integrating land uses. By directing the majority of growth into a single sustainable location, lower levels of growth would be required elsewhere and this would provide for some flexibility to recognise constraints and aspirations in other serviced settlements. However, it may restrict the opportunities for higher growth elsewhere in the county, and the delivery of a single major site is likely to extend beyond the plan period. It would also require significant infrastructure provision to enable development to start.

### **Option 3: Strategic Site and all settlements**

This option represents a continuation of the current strategy in the adopted LDP, with a single major mixed-use site in Bodelwyddan and smaller scale development in the rest of the county's settlements, including those without facilities/services. The option provides for more opportunities for growth in the smaller rural settlements. The levels of growth in each settlement would be in accordance with its position in the settlement hierarchy, with some flexibility to reflect local circumstances.

Under this option, many of the implications are the same when compared to Option 2, with additional growth in the most rural settlements without facilities and services. Whilst this may support growth aspirations in these locations, it would also allow for unsustainable patterns of development with an increase in the number of residents entirely reliant on travelling by private car to meet their everyday needs.

### **Option 4: All settlements**

This option is based on Option 1 plus development in those settlements without facilities or services. This would spread growth across all of the county's settlements. The levels of growth in each settlement would reflect its position in the settlement hierarchy, with some flexibility to reflect local circumstances.

Under this option, all settlements would have incremental growth, which may not be realistic due to physical constraints or availability of land. The levels of growth in each settlement may not be high enough to deliver additional infrastructure or benefits. It also does not recognise the role of the Bodelwyddan Strategic Site in delivering the economic aspirations of the region. Whilst this option may support growth aspirations in the most rural locations, it would also allow for unsustainable patterns of development with an increase in the number of residents entirely reliant on travelling to meet their everyday needs.

- 7.1.4 Option 2 is perhaps the most robust option as it is based on an evidenced settlement hierarchy and seeks to direct growth to the most sustainable settlements, whilst allowing for limited development in the smaller rural settlements. Rather than being based on a numerical or mechanical means to apportion growth it aims to identify which settlements are sustainably able to accommodate development. The broad scale of development would be based on the position of the settlement within the settlement hierarchy, the characteristics of that settlement and the availability of suitable sites.
- 7.1.5 Options 2 and 3 recognise the role of Bodelwyddan Strategic Site in delivering the economic aspirations of the region, as part of the Growth Deal Bid. The Strategic Site has planning permission, which this option acknowledges. The development of the site is likely to extend beyond the plan period and the delivery trajectory will need to be reassessed to understand the contribution this development will make to growth requirements over the plan period and inform the level of development required on other sites in the County.
- 7.1.6 Some flexibility can be advantageous, particularly where it is used to promote the use of Welsh language and facilitate local needs. Infill can therefore be utilised to promote such benefits, as long as the development is of an appropriate scale and nature. It can be utilised to increase the service provision and employment opportunities.

### **Proposed Spatial Strategy**

**The Preferred Strategy will focus development in Bodelwyddan Strategic Site and serviced settlements: the top three tiers in the settlement hierarchy (main centres, local centres and villages); with more limited growth in other unserved settlements (infill & small sites within development boundaries), focussed on meeting local needs.**

## 8. Preferred Strategy – Draft Key Policies

- 8.1 The Key Policies are those strategic policies which are considered necessary to address the county's key issues and to deliver the LDP Preferred Strategy. The Key Policies are high-level in nature and are not intended to cover every type of development proposal but instead set out the general principles upon which more detailed policies will be developed as part of the Deposit LDP.
- 8.2 The draft Key Policies are listed below and demonstrate how they support i) the LDP objectives, ii) the national sustainable placemaking outcomes identified in Planning Policy Wales, and iii) the seven Well-being goals identified in the Well-being of Future Generations Act.

### Placemaking

**All proposals must support the delivery of economic, social, environmental and cultural well-being, and demonstrate the following:**

- **Resource efficiency**
- **Promotion of health and well-being**
- **Maintenance and enhancement of the natural environment**
- **Equality of access**
- **Access to services and facilities**
- **Support and enhancement of the Welsh language**
- **Resilience to the impacts of climate change**
- **Promote decarbonisation and renewable energy technology**
- **High quality design that respects local character and distinctiveness.**

#### LDP objectives

3. Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.
4. Protecting and enhancing Denbighshire's natural, built and historic environment.
5. Supporting the provision, operation and development of infrastructure and services.
7. Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses.
8. Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.

|  |   |
|--|---|
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities<br>Growing our economy in a sustainable manner<br>Making best use of resources<br>Maximising environmental protection and limiting environmental impact<br>Facilitating accessible and healthy environments |
| <b>Well-being goals</b>                              | A globally responsible Wales<br>A prosperous Wales<br>A resilient Wales<br>A healthier Wales<br>A more equal Wales<br>A Wales of cohesive communities<br>A Wales of vibrant culture and thriving Welsh Language                                 |
| <b>Key evidence</b>                                  | Planning Policy Wales (edition 10, 2018)  |

8.3 Placemaking is a holistic approach to the planning and design of development and spaces. It considers not only the physical development but its context, function and relationships with the wider area. Placemaking seeks to create high quality developments and public spaces that promote prosperity, health and well-being in the widest sense.

8.4 The LDP will seek to ensure that development in the county enhances quality of life whilst protecting local distinctiveness and visual quality. Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design considerations must not only assess aesthetics, setting and scenscape but also accessibility and best use of buildings or spaces, together with how they can be supported by the public realm. The LDP will require the following five aspects of good design, as set out in Planning Policy Wales, to be applied to all development proposals:

- Access
- Character
- Community safety
- Environmental sustainability
- Movement.

## Welsh Language

Proposals for development that maintain or enhance the integrity of the Welsh language will be supported.

|  |   |
|--|---|
| <b>LDP objectives</b>                                | 2. Supporting and enhancing the Welsh Language.   |
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities   |
| <b>Well-being goals</b>                              | A prosperous Wales<br>A more equal Wales<br>A Wales of cohesive communities<br>A Wales of vibrant culture and thriving Welsh Language |
| <b>Key evidence</b>                                  | New Housing Occupancy Survey for Denbighshire (2017)  |

- 8.5 The Welsh language is an important part of the social and cultural fabric of the county. Its future well-being depends upon a wide range of factors, particularly education, demographic change, community activities and economic activity.
- 8.6 Across the county, 26.4% of the population were Welsh speakers at the time of the census in 2011, which is a decrease of 1.8% as recorded in the 2001 census. There is a considerable geographic variation in the levels of Welsh speakers, with the highest proportions in the south-west of the county and the lowest in the coastal areas.
- 8.7 This policy is intended to support and enhance the use of the Welsh language throughout the county. This includes supporting a sustainable economy and socio-economic infrastructure in Welsh speaking communities as well as providing opportunities for Welsh learners throughout the county. In line with the requirements of Planning Policy Wales and Technical Advice Note 20 'Planning and the Welsh Language', the potential impacts of the Preferred Strategy on the Welsh language have been considered as part of the Sustainability Appraisal process.

## Housing

Provision will be made for 3,775 new homes across the plan period, to enable the requirement of 3,275 homes to be met.

In order to meet local needs and demand, a range of housing types and tenures will be provided.

|  |   |
|--|---|
| <b>LDP objectives</b>                                | 1. Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire. |
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities   |

|                         |   |
|-------------------------|---|
| <b>Well-being goals</b> | A prosperous Wales<br>A healthier Wales<br>A more equal Wales<br>A Wales of cohesive communities  |
| <b>Key evidence</b>     | Denbighshire Local Housing Market Assessment (2019)<br>Denbighshire Joint Housing Land Availability Study (2018)<br>LDP Background Paper: Growth Options (2019) |

- 8.8 As outlined in Section 5 above, the housing requirement proposed as part of the Preferred Strategy is related to population-led growth scenarios, which are based on previous migration rates alongside a consideration of a sustainable level of growth informed by past build rates. In order to meet the requirement of 3,275 new homes, provision will be made for 3,775 homes which will allow for an element of flexibility and for any sites not being delivered as anticipated.
- 8.9 New homes will be provided primarily on land allocated specifically for housing within defined development boundaries, and in accordance with the Spatial Strategy and settlement hierarchy set out in Sections 6 and 7 above. In order to meet housing need and demand, a range of house types, sizes and tenures will be required. Appendix 2 sets out an indicative housing balance sheet which shows how the Plan's housing requirement figures could be met. This is indicative at present and will be refined as the Plan progresses.

## Affordable Housing

**Provision will be made for a minimum of 750 affordable homes across the plan period.**

**Affordable housing should be provided as on-site units and integrated into the proposed development, unless local needs require otherwise. The type and tenure of affordable housing to be provided will be informed by local need.**

|  |  |
|--|--|
| <b>LDP objectives</b>                                | 1. Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.  |
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities  |
| <b>Well-being goals</b>                              | A prosperous Wales<br>A healthier Wales<br>A more equal Wales<br>A Wales of cohesive communities   |
| <b>Key evidence</b>                                  | Denbighshire Local Housing Market Assessment (2019)<br>Denbighshire Joint Housing Land Availability Study (2018)<br>Denbighshire Affordable Housing Viability Study (ongoing)<br>LDP Background Paper: Growth Options (2019) |



- 8.10 Affordable housing is housing provided to meet the needs of those who cannot afford general market housing, and is retained as affordable for the first and subsequent occupiers. Affordable housing can be provided in several forms and through a Local Authority, Registered Social Landlord, private developer or via self-build housing.

Affordable housing includes:

- Social rented housing - housing for rent which is owned by Local Authorities and Registered Social Landlords. This is typically the most affordable category of affordable housing.
  - Intermediate housing - housing where prices/rents are above those of social rented housing, but below market housing prices/rents. This can include shared equity/ownership schemes, discounted for sale and intermediate rent housing.
- 8.11 The Denbighshire Local Housing Market Assessment identifies an affordable housing need in the County of 155 homes per year for the next five years. The life period of the LDP is 15 years which would equate to 2,325 homes. Delivering sufficient homes to meet all of this need is considered to be unrealistic, due to the lack of public funding available and previous delivery rates achieved through planning obligations. A minimum target of 750 affordable homes across the life of the LDP is therefore based upon historic and anticipated levels of delivery, informed by the Local Housing Market Assessment, and represents a challenging but realistic target.
- 8.12 In order to contribute to the development of sustainable and mixed communities, affordable housing provided as part of market housing developments should always be provided on-site. In exceptional circumstances the local need for affordable housing may be better met through an alternative approach to provision but this would be for the Local Authority to determine. The type and tenure of affordable homes to be provided must also reflect local needs. The specific percentage contributions and thresholds for affordable housing contributions will be informed by a high-level viability assessment of the LDP and will be set out in the Deposit LDP.

## Employment Land

**Land will be provided for the development of employment premises on a mix of strategic and local sites to meet the County's employment needs. The provision of a range of employment sites will enable businesses to start-up, invest, expand and grow.**

|  |   |
|--|---|
| <b>LDP objectives</b>                                | 6. Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy. |
| <b>PPW National sustainable placemaking outcomes</b> | Growing our economy in a sustainable manner<br>Creating and sustaining communities                                    |
| <b>Well-being goals</b>                              | A prosperous Wales<br>A resilient Wales   |

|                     |  |
|---------------------|--|
|                     | A more equal Wales<br>A Wales of cohesive communities  |
| <b>Key evidence</b> | Employment Land and Economic Growth Assessment (2019)<br>LDP Background Paper: Growth Options (2019) |

- 8.13 Planning Policy Wales and Technical Advice Note 23 'Economic Development' highlight the need to provide a range of employment sites in the county that address the identified demand from local businesses and companies seeking to invest in Denbighshire. The selection of employment sites has been made in line with the spatial strategies; focussing on main/ local centres and villages.
- 8.13 'The Regional Employment Land Strategy for North Wales' was developed on behalf of all seven North Wales planning authorities in 2014; guiding future investments, which will be delivered in line with the North Wales Growth Bid, to the most sustainable locations. The strategy highlights St Asaph Business Park and Bodelwyddan Strategic Site as key sites for future employment in Denbighshire and North Wales.
- 8.15 The LDP will also include a criteria-based policy approach to support proposals for development on alternative sites, where nature and scale of the proposal are not out of context with the surrounding area.
- 8.16 Being primarily rural in character, providing employment opportunities for local communities will include farm diversification and the introduction of new forms of employment use in the open countryside. Technical Advice Note 6 'Planning for Sustainable Rural Communities' provides the national policy framework which is going to form the starting point for any local policy formulation to support this type of planning proposal.

## **Town Centres and Retail Development**

**Proposals for new retail development will be supported in accordance with the retail hierarchy and where they are of a scale and nature appropriate to the settlement centre, along with the need for a sequential 'town centre first' approach. Principal and town centres will be the preferred location for new retail, leisure, office, social and other town centre uses. This approach will seek to maintain and enhance the viability and vibrancy of the County's principal, town and local centres.**

**The retail hierarchy is:**

|                          |   |
|--------------------------|---|
| <b>Principal centres</b> | <ul style="list-style-type: none"> <li>• Rhyl</li> <li>• Prestatyn</li> </ul>     |
| <b>Town centres</b>      | <ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> </ul> |

|  |  |  |
|--|--|--|
|  | <ul style="list-style-type: none"> <li>• Ruthin</li> </ul>   |  |
| Local centres:                                       | <ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> <li>• St Asaph</li> </ul>  |  |
| <b>LDP objectives</b>                                | 7. Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses. |  |
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities<br>Growing our economy in a sustainable manner<br>Facilitating accessible and healthy environments   |  |
| <b>Well-being goals</b>                              | A prosperous Wales<br>A healthier Wales<br>A more equal Wales<br>A Wales of cohesive communities   |  |
| <b>Key evidence</b>                                  | Denbighshire Retail Study (2018)<br>Denbighshire Town Centre Health Check (2018)   |  |

- 8.17 Retail proposals will be supported as an important element in sustaining local communities and reducing the need to travel. The scale and nature of proposals should reflect the retail hierarchy, with the largest developments being directed towards the main centres of population in the county. Town centres are recognised in Planning Policy Wales (PPW) as being the most sustainable, as well as the most appropriate locations, for new retail development and proposals must be directed towards these locations in the first instance. In order to support this approach, no new out-of-town retail developments, or extensions to existing developments, will be proposed in the LDP.
- 8.18 PPW requires planning authorities to identify a hierarchy of retail and commercial centres in development plans. The hierarchy set out above takes account of the size, scale, form, function and location of the centres in Denbighshire. Rhyl and Prestatyn are identified as 'Principle Centres' as they are the largest centres in the county and provide a wide variety of shops, services and facilities. Both have similar footfall levels and similar retail catchment areas. Denbigh, Llangollen and Ruthin are defined as 'Town centres' as they are smaller centres and do not provide the same level of services as Rhyl and Prestatyn. The final tier of 'Local centres' are smaller and provide a more limited range of facilities providing for the day to day needs of local communities.

- 8.19 Given the changing role of town centres, both town centre and primary shopping street boundaries will be reviewed, recognising the need for flexibility in maintaining occupancy and footfall and having regard to the Denbighshire Town Centre Health Check and Denbighshire Retail Study, together with relevant masterplans.

| <b>Bodelwyddan Strategic Site</b>   |   |
|---|---|
| Land at Bodelwyddan is identified as a Strategic Site, in order to meet the development needs of the north of the county and deliver the plan's Preferred Strategy.   |   |
| Development will be phased over the plan period, and beyond, and will comprise housing (including affordable housing), employment and health, education, community, transport and green infrastructure required to support the development. |   |
| <b>LDP objectives</b>   | <p>1. Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.</p> <p>5. Supporting the provision, operation and development of infrastructure and services.</p> <p>6. Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.</p> |
| <b>PPW National sustainable placemaking outcomes</b>  | <p>Creating and sustaining communities</p> <p>Making best use of resources</p> <p>Growing our economy in a sustainable manner</p> <p>Facilitating accessible and healthy environments</p> <p>Maximising environmental protection and limiting environmental impact</p>  |
| <b>Well-being goals</b>   | <p>A prosperous Wales</p> <p>A healthier Wales</p> <p>A more equal Wales</p> <p>A Wales of cohesive communities</p> <p>A Wales of vibrant culture and thriving Welsh Language</p>   |
| <b>Key evidence</b>   | <p>Regional Employment Land Strategy for North Wales (2014)</p> <p>North Wales Growth Bid: Proposition document (2018)</p> <p>Outline planning permission (granted 2016)</p>  |

- 8.20 The Bodelwyddan Strategic Site forms the basis of the Preferred Strategy for the current LDP (2006-2021), and represents a major mixed-use in the north of the county. This was supported by the identification in the Wales Spatial Plan (2004, updated 2008) of a 'hub' around the Rhyl/Prestatyn/St Asaph area, which was intended to provide a focus for future employment, housing and retail growth. The location was also supported within the North Wales Coast Strategic Regeneration Area (a

designation which has now ended). Planning permission for the development of the site was granted in 2016.

- 8.21 The Bodelwyddan Strategic Site has been identified as a potential project as part of the emerging 'Growth Deal for the Economy of North Wales'. There are other major development sites identified across the North Wales region and together they will assist in meeting the demand for housing as well as providing well-serviced, high quality employment land.

| <b>Infrastructure</b>  |   |
|--|---|
| Development will be directed to locations where the necessary infrastructure will be available.  |   |
| New developments will be expected to contribute to the provision of infrastructure, where necessary to mitigate the impacts of new development, comprising:  |   |
| <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Recreation, open space and green infrastructure</li> <li>• Education</li> <li>• Sustainable transport and active travel</li> <li>• Regeneration</li> <li>• Welsh language</li> <li>• Telecommunications and Broadband</li> <li>• Any other Council priorities identified at the time of the application.</li> </ul> |   |
| <b>LDP objectives</b>  | 5. Supporting the provision, operation and development of infrastructure and services.  |
| <b>PPW National sustainable placemaking outcomes</b>   | Creating and sustaining communities<br>Making best use of resources<br>Facilitating accessible and healthy environments                                     |
| <b>Well-being goals</b>  | A prosperous Wales<br>A resilient Wales<br>A healthier Wales<br>A more equal Wales<br>A Wales of cohesive communities                                       |
| <b>Key evidence</b>  | North Wales Joint Local Transport Plan (2015)<br>Denbighshire Open Space Assessment and Audit (2018)<br>Denbighshire Local Housing Market Assessment (2019) |

- 8.22 Available infrastructure influences people's travel choices, social options, recreational activities and therefore new development places additional demands on existing infrastructure and services. Additional demands can have significant impacts on infrastructure so that it requires improvement, upgrading or additional maintenance. Considerations include aspects such as the increased number of road users hindering accessibility, generating additional noise and air pollution or limiting health and

wellbeing. This supports a requirement that new development should be located where every day needs can be met locally, via short distances and through active travel. Planning Policy Wales requires development to enable people to have good access to a range of facilities and services within their locality. Steps are therefore also required, to mitigate the negative impact, of new development and additional demands, on infrastructure provisions, as well as enabling the enhancement or creation of new infrastructure.

## Visitor Economy

**Proposals which strengthen and diversify the visitor economy will be supported, where they are suitably located and conserve the county's natural and built environment.**

|  |   |
|--|---|
| <b>LDP objectives</b>                                | 6. Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.                                       |
| <b>PPW National sustainable placemaking outcomes</b> | Growing our economy in a sustainable manner<br>Creating and sustaining communities<br>Maximising environmental protection and limiting environmental impact |
| <b>Well-being goals</b>                              | A prosperous Wales<br>A Wales of cohesive communities<br>A Wales of vibrant culture and thriving Welsh Language   |
| <b>Key evidence</b>                                  | Denbighshire Study of Hotel Demand & Potential (2018)   |

- 8.23 The visitor economy plays a key role in the county's economy. It enables rural enterprises and communities to diversify whilst supporting regeneration of coastal towns. Historic and cultural features together with the county's natural beauty act as attractions although they also require protection so that they are not adversely impacted as a result of increased visitor numbers and associated tourism pressures including development.

## Transport & Accessibility

**Proposals for new facilities, and improvements to existing facilities, which improve accessibility to employment and services, particularly by sustainable means, will be supported.**

**Developments will be expected to make provision for Active Travel and green infrastructure as part of their design, and link into wider networks.**

|  |   |
|--|---|
| <b>LDP objectives</b>                                | <p>3. Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.</p> <p>8. Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.</p> |
| <b>PPW National sustainable placemaking outcomes</b> | <p>Creating and sustaining communities</p> <p>Growing our economy in a sustainable manner</p> <p>Maximising environmental protection and limiting environmental impact</p> <p>Facilitating accessible and healthy environments</p>  |
| <b>Well-being goals</b>                              | <p>A globally responsible Wales</p> <p>A prosperous Wales</p> <p>A resilient Wales</p> <p>A healthier Wales</p> <p>A more equal Wales</p> <p>A Wales of cohesive communities</p>  |
| <b>Key evidence</b>                                  | <p>North Wales Joint Local Transport Plan (2015)</p> <p>Denbighshire Open Space Assessment and Audit (2018)</p>   |

8.24 The provision of new, or the extension of existing, transport infrastructure is not limited to roads and motor vehicle requirements, but equally focuses on walking routes, cycling infrastructure and public transport infrastructure/facilities. New transport infrastructure may be required to alleviate existing highway problems, based on evidence of needs, or to facilitate major developments, which are unlikely to be accommodated within existing infrastructure.

8.25 In order to support active travel, all new developments must be fully accessible by walking or cycling. New development must be wholly integrated with existing settlements and networks. Integration must ensure active travel is not only practical and safe, but that it is an attractive means of travel. The LDP will identify and safeguard active travel routes and networks identified in the Integrated Network Maps required by the Active Travel Act 2013.

## Minerals

**Mineral resources will be safeguarded and Denbighshire will seek to contribute to regional and local demand in providing a continuous supply of minerals to meet the needs of industry and society as a whole.**

**Wherever possible, aggregate requirements should come from secondary and recycled sources, before consideration is given to primary aggregates.**



|  |   |
|--|---|
| <b>LDP objectives</b>                                | 3. Protecting, enhancing and sustainable developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources. |
| <b>PPW National sustainable placemaking outcomes</b> | Making best use of resources<br>Maximising environmental protection and limiting environmental impact<br>Growing our economy in a sustainable manner                  |
| <b>Well-being goals</b>                              | A globally responsible Wales<br>A prosperous Wales<br>A resilient Wales   |
| <b>Key evidence</b>                                  | Regional Technical Statement (2014)   |

8.26 Minerals contribute widely to the Welsh economy. They are, and will continue to be, an important resource in construction and manufacturing industries. It is therefore important that an adequate and reliable supply of minerals is maintained. However, there can be significant environmental and social impacts from the extraction and processing of minerals. Historically, mineral extraction has largely occurred within areas of high landscape quality, specifically the Clwydian Range and Dee Valley AONB. The LDP will direct new mineral extraction away from the most environmentally sensitive areas and seek to ensure that future mineral extraction is necessary, and contributes towards meeting regional and local demand.

8.27 In order to ensure resources are used efficiently and sustainably wherever possible, the LDP will encourage the use of secondary and recycled resources, prior to permitting the extraction of minerals from primary sources.

## **Waste Management**

**Proposals must support the prevention of waste in the first instance and, where this is not possible, minimise the impact on the environment through re-use and recycling of waste.**

**Proposals for waste management facilities must demonstrate how they support the movement of waste up the waste hierarchy, are supported by evidence of need and do not result in unacceptable impacts on amenity.**

|  |  |
|--|--|
| <b>LDP objectives</b>                                | 5. Supporting the provision, operation and development of infrastructure and services.   |
| <b>PPW National sustainable placemaking outcomes</b> | Making best use of resources<br>Maximising environmental protection and limiting environmental impact<br>Growing our economy in a sustainable manner |
| <b>Well-being goals</b>                              | A globally responsible Wales<br>A prosperous Wales<br>A resilient Wales  |

|                     |   |
|---------------------|---|
|                     | A healthier Wales   |
| <b>Key evidence</b> | Interim Progress Report: Waste Planning Monitoring North Wales (2016) |

- 8.28 Waste is produced by all types of land use, during construction, operation and demolition. The need to change the way in which we deal with waste is recognised in policy at all levels, particularly the need to reduce its production in the first place. The waste hierarchy provides the starting point for all types of waste management proposals, as well as proposals which generate waste products. However, consideration of the hierarchy should be set against any relevant wider social, economic and environmental factors. Waste prevention and approaches towards encouraging reuse and recycling should be considered at an early stage as part of materials choices and design.
- 8.29 In order to deal with waste sustainably, it is essential that the county has an adequate network of waste facilities. Localised waste management can help to reduce the transport impacts waste can have and assist the local economy. The way in which waste is managed may change over the life of the LDP and it is important that the plan facilitates such changes whilst ensuring that it is carried out in such a way as to maximise benefit and minimise or remove any negative impacts.

## Natural & Built Environment

**Denbighshire's natural and built environment will be protected from development that adversely affects their protected characteristics, features or their setting.**

**All proposals must contribute towards the preservation and, where possible, the enhancement of the natural and built environment.**

|                       |  |
|-----------------------|--|
| <b>LDP objectives</b> | <p>3. Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.</p> <p>4. Protecting and enhancing Denbighshire's natural, built and historic environment.</p> <p>7. Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses.</p> <p>8. Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.</p> |
|-----------------------|--|

|  |   |
|--|---|
| <b>PPW National sustainable placemaking outcomes</b> | Creating and sustaining communities<br>Making best use of resources<br>Maximising environmental protection and limiting environmental impact<br>Facilitating accessible and healthy environments                |
| <b>Well-being goals</b>                              | A globally responsible Wales<br>A prosperous Wales<br>A resilient Wales<br>A healthier wales<br>A more equal Wales<br>A Wales of cohesive communities<br>A Wales of vibrant culture and thriving Welsh language |
| <b>Key evidence</b>                                  | Denbighshire Green Barrier Review (ongoing)<br>Denbighshire Open Space Assessment and Audit (2018)  |

- 8.30 Denbighshire has a high quality natural and historic environment which the LDP will seek to enhance and protect. These high quality places provide a unique identity and distinctiveness for the county and must be protected for their historic, aesthetic and nature conservation value. The natural and historic environment also contributes towards the economy, and enhances the health and well-being of those who live and work in Denbighshire.
- 8.31 The LDP will require all proposals to fully consider the impact on the historic environment and on the significance and value of individual historic assets, as well as their contribution to local character and distinctiveness. The protection, conservation and enhancement of historic assets are most effective when they are considered at the earliest stage of designing new proposals. The LDP will include specific requirements for proposals which may impact upon the Pontcysyllte Aqueduct and Canal World Heritage Site, to ensure its Outstanding Universal Value is safeguarded.
- 8.31 The Environment (Wales) Act 2016 and Well-being of Future Generations Act 2015 require Local Authorities to maintain and enhance the natural environment which is biodiverse and supports social, economic as well as ecological resilience, having the capacity to adapt to change. As part of meeting these duties, the LDP will require all proposals to demonstrate that they have incorporated potential environmental benefits within schemes, wherever practicable. Where a development has an opportunity to deliver biodiversity enhancements through its design and layout, these should be incorporated into the scheme. The LDP will also require consideration to be given to the integration of green and blue infrastructure, and their linkages, at the earliest design stage.

## 9. LDP Progress and Future Stages

### 9.1 Next Steps

- 9.1.1 Following the close of this consultation stage, the Council will consider the responses received and these will inform the development of the 'Deposit LDP'. The Deposit LDP is a full draft of the Local Development Plan and will contain all policies and site allocations. It is anticipated this will be published for public consultation early in 2020.
- 9.1.2 In accordance with the Council's Delivery Agreement, the Deposit LDP will be accompanied by an updated Sustainability Appraisal, updated Candidate Sites Register, Initial Consultation Report and other supporting documents as necessary.
- 9.1.3 A series of Supplementary Planning Guidance (SPG) documents will be required to support certain policies, or site delivery, in the LDP. SPG are not part of the LDP but instead provide further explanation on policies or detailed site requirements. It is anticipated that the majority of the SPGs required will be produced after the LDP has been adopted, but there may be a need for some to be developed alongside the Deposit LDP.

### 9.2 Submission and Examination

- 9.2.1 Following the close of the Deposit LDP public consultation, the Council will consider the responses received and finalise all LDP documents before formally submitting the full plan to Welsh Government. An independent Planning Inspector will then be appointed to conduct an examination of the LDP, before making a final determination on the plan and reporting on any changes required. As part of the examination process there will be a series of public hearing sessions to consider whether the plan meets the 'Tests of Soundness'. The final version of the LDP will then be formally adopted by Council and will take effect from that date. Adoption of the LDP is anticipated to be at the end of 2021.

## Appendix 1 – Issues and Objectives

| Agreed Issues   | Objectives for replacement LDP   | Well-being Goals, Well-being plan and Corporate Plan   |
|---|--|--|
| <ul style="list-style-type: none"> <li>• Need for market housing</li> <li>• Need for affordable housing</li> <li>• Need to secure rural housing</li> </ul>  | <p><b>Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.</b></p> | <p>A healthier Wales<br/>A more equal Wales<br/>A Wales of cohesive communities</p> <p><b>People</b> – supporting good mental well-being for all ages<br/><b>Community</b> – Supporting Community Empowerment</p> <p>Everyone is supported to live in homes that meet their needs<br/>Younger people want to live and work here, and have the skills to do so.</p>   |
| <ul style="list-style-type: none"> <li>• Potential impacts on Welsh language and culture need to be assessed. LDP Strategy, allocations and policies need to protect, support and enhance.</li> </ul> | <p><b>Supporting and enhancing the Welsh Language.</b></p>   | <p>A healthier Wales<br/>A more equal Wales<br/>A Wales of cohesive communities<br/>A Wales of vibrant culture and thriving Welsh language</p> <p><b>People</b> – supporting good mental well-being for all ages<br/><b>Community</b> – Supporting Community Empowerment</p> <p>The Council works with people and communities to build independence and resilience</p> <p>Younger people want to live and work here, and have the skills to do so.</p> |
| <ul style="list-style-type: none"> <li>• Need to continue to protect existing open space and look</li> </ul>  | <p><b>Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue</b></p>   | <p>A prosperous Wales<br/>A resilient Wales<br/>A healthier Wales</p>  |

| Agreed Issues   | Objectives for replacement LDP  | Well-being Goals, Well-being plan and Corporate Plan  |
|---|---|---|
| <ul style="list-style-type: none"> <li>at options for delivery of new provision</li> <li>• Need to agree position with the minerals industry regarding areas of search or allocations.</li> <li>• Need to provide for renewable energy generation.</li> </ul> | <b>infrastructure, renewable energy and mineral resources.</b>                                    | <p>A more equal Wales<br/>A Wales of cohesive communities<br/>A globally responsible Wales</p> <p><b>People</b> – supporting good mental well-being for all ages<br/><b>Community</b> – Supporting Community Empowerment<br/><b>Place</b> – Supporting Environmental Resilience</p> <p>The environment is attractive and protected, supporting well-being and economic prosperity</p> <p>Younger people want to live and work here, and have the skills to do so.</p> |
| <ul style="list-style-type: none"> <li>• Need to protect and enhance the natural and built environment.</li> </ul>  | <b>Protecting, enhancing and sustainably developing Denbighshire's built and historic assets.</b> | <p>A prosperous Wales<br/>A Wales of cohesive communities<br/>A globally responsible Wales</p> <p><b>People</b> – supporting good mental well-being for all ages.</p> <p>The environment is attractive and protected, supporting well-being and economic prosperity</p>   |
| <ul style="list-style-type: none"> <li>• Need to ensure that infrastructure capacity is available or is provided in relation to new development.</li> <li>• Need to provide for waste management.</li> </ul>  | <b>Supporting the provision, operation and development of infrastructure and services.</b>        | <p>A prosperous Wales<br/>A resilient Wales<br/>A healthier Wales<br/>A more equal Wales<br/>A Wales of cohesive communities<br/>A globally responsible Wales</p> <p><b>Community</b> – Supporting Community Empowerment</p>  |

| Agreed Issues  | Objectives for replacement LDP   | Well-being Goals, Well-being plan and Corporate Plan  |
|--|--|---|
|  |  | Communities are connected and have access to goods and services locally, online or through good transport links   |
| <ul style="list-style-type: none"> <li>• Need to deliver serviced strategic employment land – KSS, Growth bid</li> <li>• <u>need</u> to site local employment sites where they will be sustainable and not subject to pressure to release for other uses.</li> <li>• Need to ensure that rural employment sites are protected where practical and that policies are flexible enough to support the rural economy whilst still protecting our high quality natural and built environment.</li> <li>• Continue to develop quality tourism products.</li> </ul> | <b>Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.</b>  | <p>A prosperous Wales<br/>A Wales of cohesive communities</p> <p><b>Community</b> – Supporting Community Empowerment</p> <p>Communities are connected and have access to goods and services locally, online or through good transport links</p> <p>The environment is attractive and protected, supporting well-being and economic prosperity</p> |
| <ul style="list-style-type: none"> <li>• Need to consider role of existing town centres in addition to retailing to improve viability and long term sustainability.</li> <li>• Need to continue to support regeneration initiatives</li> </ul>   | <b>Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses.</b> | <p>A prosperous Wales<br/>A resilient Wales<br/>A healthier Wales<br/>A more equal Wales<br/>A Wales of cohesive communities<br/>A globally responsible Wales</p> <p><b>Community</b> – Supporting Community Empowerment</p>  |

| Agreed Issues  | Objectives for replacement LDP   | Well-being Goals, Well-being plan and Corporate Plan   |
|--|--|--|
|  |  | <p>Communities are connected and have access to goods and services locally, online or through good transport links</p> <p>The environment is attractive and protected, supporting well-being and economic prosperity</p>   |
| <ul style="list-style-type: none"> <li>• Prioritise walking &amp; cycling routes in new developments. Active Travel Act.</li> <li>• Locate development to maximise accessibility as far as constraints allow.</li> <li>• Need to ensure that new development is directed away from flood risk areas and that the longer term implications of climate change are considered.</li> </ul> | <p><b>Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.</b></p> | <p>A resilient Wales<br/>A healthier Wales<br/>A more equal Wales<br/>A Wales of cohesive communities<br/>A globally responsible Wales</p> <p><b>Community</b> – Supporting Community Empowerment<br/><b>Place</b> – Supporting Environmental Resilience</p> <p>Everyone is supported to live in homes that meet their needs.</p> <p>Communities are connected and have access to goods and services locally, online or through good transport links.</p> <p>The Council works with people and communities to build independence and resilience.</p> <p>The environment is attractive and protected, supporting well-being and economic prosperity</p> <p>Younger people want to live and work here, and have the skills to do so.</p> |



## Well being Goals

A prosperous Wales A resilient Wales

A healthier Wales

A more equal Wales

A Wales of cohesive communities

A Wales of vibrant culture and thriving Welsh language A globally responsible Wales

## Conwy Denbighshire Well-being Plan 3 Priority Areas

1. People – supporting good mental well-being for all ages
  - a. Use the environment to encourage mental well-being
2. Community – Supporting Community Empowerment
  - a. Affordable housing & adaptation
  - b. Accessibility to services
  - c. Home building
3. Place – Supporting Environmental Resilience
  - a. Flood risk
  - b. Renewable energy schemes
  - c. Thriving natural environment

## Corporate Plan Priorities

- Everyone is supported to live in homes that meet their needs
- Communities are connected and have access to goods and services locally, online or through good transport links
- The Council works with people and communities to build independence and resilience
- The environment is attractive and protected, supporting well-being and economic prosperity
- Younger people want to live and work here, and have the skills to do

## Appendix 2 – Meeting housing needs

As set out in the Preferred Growth Options, the Preferred Strategy will seek to meet a requirement for 3,275 new homes by making provision for 3,775 dwellings through applying a 15% flexibility allowance. This requirement will be met through a variety of sources of supply. This will include any dwellings completed after April 2018, commitments (existing planning permissions) that are genuinely capable of being delivered, allocations and a realistic allowance for windfalls (unidentified sites coming forward during the Plan period). The Deposit Plan will contain a housing trajectory setting out how and when housing will be delivered through the Plan period.

An indicative housing balance sheet is set out below which shows how the Plan's housing requirement figures will be met. This is indicative at present and will be refined as the Plan progresses.

| Element  | Number       | Notes  |
|--|--------------|--|
| <b>Existing Land supply</b>                                |              |  |
| Sites under construction                                   | 563          | These are units remaining to be completed on sites currently under construction.   |
| Full planning permission granted                           | 471          | This reflects a review of sites whereby only sites with planning permission which are realistically likely to be developed are included (large sites 10+ only)   |
| Outline planning permission granted                        | 695          | This reflects a review of sites whereby only sites with planning permission which are realistically likely to be developed are included (large sites 10+ only). This includes an allowance of 400 units for Bodelwyddan. |
| Allocations likely to be delivered by 2033                 | 433          | This reflects a review of sites allocated in the current adopted LDP, only sites which are realistically likely to be developed are included (large sites 10+ only).   |
| Small sites/ conversions/ windfall allowance 50 x 15 years | 750          | An allowance of 50 units per annum has been included.  |
| <b>TOTAL SUPPLY</b>  | <b>2,912</b> |  |
| <b>LDP Requirement 2018-2033</b>                           | <b>3,775</b> | Housing requirement 2018 – 2033 (3275 + 15% flexibility)   |
| <b>NEW ALLOCATIONS REQUIRED</b>                            | <b>863</b>   | Requirement minus current supply   |

## Appendix 3- Soundness Self-Assessment Checklist

### Introduction

The fundamental requirement for a Local Development Plan (LDP) to be 'sound' is prescribed in the Planning and Compulsory Purchase Act 2004 and set out in national Planning Policy. As part of the process of establishing soundness the Council is required to undertake a self-assessment of its own LDP's soundness. In this respect this document represents a double-check as the Plan progresses that it complies with the preparation requirements and that it is considered that the plan meets the 3 tests of soundness.

The soundness of the LDP will be assessed at an independent examination by a Planning Inspector. The examination will assess whether the Plan's preparatory requirements have been followed and will determine whether it is 'sound', namely that it meets all 3 soundness tests as set out below.

The LDP Manual Ed.2 (2015) in elaborating on the above identifies a series of questions to assist in indicating those matters that may be relevant under each test of soundness.

#### **Preparation Requirements:**

- Has preparation complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc?)

#### **Soundness Tests:**

**Test 1: Does the plan fit?** (i.e. is it clear that the LDP is consistent with other plans?)

##### **Questions**

- Does it have regard to national policy and WSP
- Does it have regard to Well-being Goals
- Does it have regard to the Welsh National Marine Plan
- Is it consistent with regional plans, strategies and utility programmes?
- Is it compatible with the plans of neighbouring authorities?
- Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?

**Test 2: Is the plan appropriate?** (i.e. is the plan appropriate for the area in the light of the evidence?)

##### **Questions**

- Is it locally specific?
- Does it address the key issues?

- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind plan policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

### **Test 3: Will the plan deliver?** (i.e. is it likely to be effective?)

#### **Questions**

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?

In undertaking the self-assessment the following tables use the template of questions provided in relation to each test to consider the Plans soundness to date. It should be noted that this self-assessment reflects the Denbighshire LDP as at Pre-Deposit Preferred Strategy stage. As such the self-assessment will be further developed as the replacement LDP progresses through the Plan making process. In this respect the nature of some of the responses to the questions posed through the tests of soundness will become more definitive in content at subsequent plan making stages notably Deposit LDP.

### **Preparation Requirements:**

- *Has preparation complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc?).*

Yes. The Plan has been prepared in accordance with the procedural requirements. Notable reference should be had to the publication of the Sustainability Appraisal /Strategic Environmental Assessment and the Habitat Regulations Assessment Screening Report which have been published as supporting documents to the Pre-Deposit Preferred Strategy.

### **Test 1: Does the plan fit?**

(i.e. is it clear that the LDP is consistent with other plans?)

The formulation of the Pre-Deposit Preferred Strategy has been prepared with full regard to the relevant Plans and strategies, whilst recognising that it will need to respond and develop as it progresses through its preparatory process.

The national, regional and local context (including those of adjoining areas) is, where relevant, identified within the Preferred Strategy but also within the Review Report and Information papers and SA/SEA Scoping Report etc.

The SA Scoping Report reviews the relevant plans and policies at International/European, national, regional and local level in order to take account of the relationship between the LDP and other relevant policies, plans, programmes (PPP) and sustainability objectives. This identifies implications in relation to the LDP.

The influence of the above is also reflected in the identification of key issues for Denbighshire. These are subsequently reflected throughout the Pre-Deposit Preferred Strategy and have informed the vision, strategic objectives and strategic policies. There is evidence of linkages to the Well-being Goals, Well-being Plan and Corporate Plan in the paper setting out how the objectives relate to key issues. There are also clear links to the objectives, national, regional and local policy and key pieces of background evidence for the strategic policies.

### *Does it have regard to national policy and WSP?*

The Pre-Deposit Preferred Strategy LDP document identifies the national, Plans, Policies and Strategies (PPS) documents which have implications on land-use planning. The Pre-Deposit Preferred Strategy LDP has taken into account the implications that are relevant.

The SA/SEA documents (Scoping Report, initial Sustainability Appraisal Report, Sustainability Report and Environmental Report) also include a review of PPS documents. The review identifies sustainability implications for the County and the LDP.

Denbighshire falls into two regional areas within the Wales Spatial Plan, the North East Wales (Border & Coast) and Central Wales area. The strategic principles of both the approved Spatial Plan document and the interim statements have been considered in the Preferred Strategy document.

*Does it have regard to Well-being Goals?*

The Pre-Deposit Preferred Strategy has full regard to the provisions of the Well-being of Future Generations Act 2015 and with full reference to the Well-being Goals. The promotion and recognition of Well-being has been interwoven into the early conversations held regarding Plan preparation with a range of stakeholders. The Pre-Deposit Preferred Strategy through its identification of issues, objectives, vision, strategy and key policies for the LDP all relate back to the national and local Well-being goals grouping them under each heading.

The theme of Well-being and the provisions of the Well-being of Future Generations Act 2015 is reflected in the use of the local well-being goals in framing the strategic objectives and the strategic policies.

*Does it have regard the Welsh National Marine Plan?*

Yes. The strategic policies, combined with subsequent detailed policies, will ensure that the LDP complements the Marine Plan.

*Is it compatible with the plans of neighbouring authorities?*

The preparation of the Pre-Deposit Preferred Strategy reflects the close contact with all neighbouring authorities (as well as other essential organisations) both on an individual and topic basis but also through regional frameworks. The neighbouring authorities involved are:

- Conwy County Borough Council;
- Flintshire County Council;
- Wrexham County Borough Council;
- Gwynedd Council;
- Snowdonia National Park Authority; and
- Powys County Council.

As part of our recognition of the value of working with neighbouring authorities, and in response to the Cabinet Secretary's emphasis on collaborative working, we have undertaken joint working on a number of parts of the evidence base. These include a Viability Study with Flintshire and Wrexham Councils; Retail Study and work on Growth Options with Conwy CBC. The nature of the co-operation within authorities and sharing of approaches including comparable thematic policy areas will be developed as the Plan's preparatory process continues.

Regard will also be had to the emphasis on regional working in light of future provisions around Strategic Development Plans (SDP) and the content of the National Development Framework (NDF) as it emerges.

*Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?*

The Conwy and Denbighshire Local Well-being Plan (2018 – 2023) sets out the local objectives to improve the economic, social, cultural and environmental well-being for the area.

The Council also has well-being objectives which are contained within its Corporate Plan 2017 - 2022.

The Pre-Deposit Preferred Strategy builds on the Council's and PSB commitments in relation to well-being as set out both within the corporate plan and the Well-being Plan.

The identification of issues and objectives to address them have been clearly linked to Well-being objectives in the corporate plan and the Well-being Plan.

Strategic policies are also linked to the objectives of these documents in the Pre-Deposit Preferred Strategy.

**Test 2: Is the plan appropriate?** (i.e. is the plan appropriate for the area in the light of the evidence?)

The formulation of the Pre-Deposit Preferred Strategy is underpinned by evidence and the identification of locally specific Issues, Vision, Strategic Objectives and Strategic Policies.

The Well-being Plan, well-being objectives and local corporate strategies have provided a basis for a Pre-Deposit Preferred Strategy that is specific to Denbighshire.

The issues, vision and objectives along with the growth and spatial strategy and strategic policies are all linked to the Well-being Goals, corporate plan and the Well-being Plan.

Further evidence including that in respect of the Role and Function of settlements and population and household demographics has been undertaken and published alongside the Pre-Deposit Preferred Strategy.

*Is it locally specific?*

This Pre-Deposit Preferred Strategy is a product of effective engagement and consensus building. Since the commencement of the review in May 2018, there have been:

- 8 meetings of the Strategic Planning Group;
- 3 LDP workshop / seminars for City, Town and Community Councils;
- 1 Elected member workshop;
- A number of meetings and discussions with key stakeholders as outlined in the consultation statement.

In terms of Elected Members, this Strategy has been shaped by cross party input. There have been eight meetings of the Strategic Planning Group since June 2018. This Panel is drawn up from Elected Members from each Member Area Group and its primary purpose is to guide and take political ownership of the Replacement LDP.

The LDP Issues and objectives are linked to the Well-being Goals, corporate plan and the Well-being Plan to reflect their local relevance. The strategic policies also identify how they relate to the LDP objectives, national policy, Well-being Goals and locally distinctive key evidence.

*Does it address the key issues?*

The LDP objectives have been developed in direct relation to the identified issues within the context of the Well-being goals, Well-being Plan and Corporate Plan. This is set out in Appendix 1 to the Pre-Deposit Preferred Strategy.

The LDP Issues and objectives are linked to the Well-being Goals, corporate plan and the Well-being Plan to reflect their local relevance. The strategic policies also identify how they relate to the LDP objectives, national policy, Well-being Goals and locally distinctive key evidence.



*Is it supported by robust, proportionate and credible evidence?*

Yes. Those notable pieces of evidence (in addition to the consensus building and stakeholder conversations undertaken as outlined above) that underpin the Strategy include:

- 4 Adopted LDP Annual Monitoring Review reports since adoption in 2013;
- LDP Review Report;
- Population and Household Growth Options Paper – produced in collaboration with Conwy CBC;
- Spatial Options Report;
- Settlement Hierarchy Report
- Information Paper on Building Sustainable Communities;
- Information Paper on Promoting a Sustainable Economy;
- Information Paper on Valuing our Environment;
- Information Paper on Achieving Sustainable Accessibility;
- Information Paper on Respecting Distinctiveness;
- SA Scoping Report;
- Initial SA Report;
- Habitats Regulations Assessment Screening Report.

The above is supplemented by a range of other documents that make up a robust evidence base including Strategic Flood Consequences Assessment; Local Housing Market Assessment; Joint Housing Land Availability Studies, Employment Land Study and the annual Employment Land Reviews.

Further studies and pieces of evidence are currently being undertaken and commissioned, including at a local and regional level. Further work will be undertaken during the LDP preparatory process as appropriate and necessary.

*Can the rationale behind plan policies be demonstrated?*

The Pre-Deposit Preferred Strategy's Issues, Vision, Strategic Objectives, Strategy and Strategic Policies have been informed by evidence, engagement and other plans and strategies. The LDP Issues and objectives are linked to the Well-being Goals, corporate plan and the Well-being Plan to reflect their local relevance. The strategic policies also identify how they relate to the LDP objectives, national policy, Well-being Goals and locally distinctive key evidence.

*Does it seek to meet assessed needs and contribute to the achievement of sustainable development?*

The Pre-Deposit Preferred Strategy is derived from (and based upon) evidence which will be further developed and added to as the Plan progresses through its preparatory processes.

The achievement of sustainable development is a central component of the Plan. The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) process has informed the preparation of the Preferred Strategy.

The SA/SEA has an integral and iterative role in the preparation of an LDP. In this respect, its use in testing or measuring the performance of the LDP from the start through to the preparation of the Deposit LDP is indicative of the iterative feedback between the SA and the LDP as work progresses.

The hierarchy of settlements has been developed taking account of the respective sustainability credentials of each settlement which defines how they contribute to their wider communities. This hierarchy recognises and acknowledges the availability of services and facilities, accessibility issues and other considerations. Reference should be made to the Settlement Hierarchy Report.

*Are the vision and the strategy positive and sufficiently aspirational?*

The Vision and strategy reflect an aspirational direction of travel for Denbighshire. The growth options proposed in the strategy are higher than the baseline projections and reflect the desire to encourage sustainable development to address issues such as the population structure imbalance we currently see.

The strategy also references the aspiration of developing a strategic site at Bodelwyddan in-line with the Growth Deal for the Economy of North Wales which demonstrates Denbighshire's commitment to wider economic development within the region.

*Have the 'real' alternatives been properly considered?*

The Pre-Deposit Preferred Strategy is considered to be realistic and appropriate having been developed through and from a number of 'real' alternatives.

A number of different alternative growth and spatial options have been considered and are further detailed in the topic paper on Strategic Growth Options and Spatial Options.

The development of the growth and spatial options identified hybrid options incorporating aspects from others put forward for consideration. These hybrid options emerged as part of engagement, notably via the Strategic Planning Group, member and community workshops.

The Strategic Options were also considered through the SA/SEA process which has informed the preferred strategy.

*Is it logical, reasonable and balanced?*

The Pre-Deposit Preferred Strategy emerged from a clear understanding of the issues both nationally and also critically those affecting Denbighshire. It takes a balanced view of the County in land use planning terms. Where appropriate, it integrates with other plans and strategies whilst ensuring it is reflective of national policy and the need for a sustainable and deliverable Plan.

The Pre-Deposit Preferred Strategy has emerged from engagement and evidence and as such is both logical and reasonable and based on a balanced outlook.

*Is it coherent and consistent?*

The Plan meets the requirements relating to coherency and consistency as demonstrated by a logical flow through from the issues through to the strategic policies.

The preparation of the Pre-Deposit Preferred Strategy has allowed an opportunity to evaluate a number of alternative strategic options. Each option has been fully considered - primarily through the Strategic Planning Group.

There has been demonstrable links with the Well-being Plan and the Council's well-being goals with the LDP closely aligned with such corporate priorities. The Draft Preferred Strategy has evolved through engagement including with key stakeholders, the community and elected members.

*Is it clear and focused?*

The Pre-Deposit Preferred Strategy is set out in a clear and logical form allowing a clear understanding of how the strategy has been developed from identification of the key issues, development of objectives, consideration of the options and selection of the preferred strategy. The strategic policies also provide references back to the objectives and key evidence to demonstrate how they have been arrived at.

**Test 3: Will the plan deliver** (i.e. is it likely to be effective?)

*Will it be effective?*

The Pre-Deposit Preferred Strategy objectives have emerged from an understanding of the issues and needs of Denbighshire as well as a sound, logical and robust evidence base. The strategy seeks to integrate and reflect other plans and strategies as part of an integrated approach to delivery maximising its opportunities to be effective in its implementation.

This self-assessment will be further developed to broaden the expression of the Plan's effectiveness as it progresses through the preparatory process and as the specific policies and site based allocations etc. are developed.

*Can it be implemented?*

The preparation of the Plan is with the clear intention that it be implementable and that its policies and proposals be delivered within the Plan period.

The Pre-Deposit Preferred Strategy sets out a deliverable spatial framework and strategic growth which is based on sustainability principles and is responsive to the needs of the communities of Denbighshire. The policies and proposals (both strategic and eventually specific within the future Deposit LDP) will provide the framework through which the Plan's objectives will be implemented and the decision-making process undertaken.

As part of the preparation of the Deposit LDP an effective and appropriate monitoring framework will be developed and included within the Plan. This will form the basis for undertaking the Annual Monitoring Report (AMR).

The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted LDP.

*Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?*

Infrastructure providers are an important component in developing the LDP and are key consultees. In this respect they have and will continue to be engaged throughout the Plan making process. Notably further consultation will be undertaken in the preparation of the Deposit LDP to ensure the Plan delivery is fully evidenced.

*Will development be viable?*

The need for development to be viable will be an important aspect in the preparation of the Plan from the future development of evidence through to the identification of sites or the development of specific policies.

Work is currently being developed with neighbouring authorities to establish a robust assessment of viability on sites within the County. This work will ensure that any viability is appropriately informed by local conditions and that the implications of viability on a developments potential to come forward is fully informed and robustly evidenced.

*Can the sites allocated be delivered?*

With the exception of the Strategic Site, the Pre-Deposit Preferred Strategy does not identify specific allocations. Allocations will be identified as part of the Deposit LDP with their deliverability evidenced accordingly. The development of the strategic options has been informed by evidence of previous deliverability on sites.

The strategic site identified within the Pre-Deposit Preferred Strategy is of regional significance and is featured in the Growth deal for the Economy of North Wales. The development of the site is dependent upon funding being made available to develop necessary infrastructure to bring it forward.

*Is the plan sufficiently flexible? Are there appropriate contingency provisions?*

The preparation of the Pre-Deposit Preferred Strategy has sought to reflect the need for flexibility. This will be further developed as part of the Deposit LDP to provide a framework which is able to respond as appropriate to changes in circumstances.

The identification of the housing requirement incorporates flexibility in the amount of housing land to be identified. The Pre-Deposit Preferred Strategy, in taking forward this requirement, has incorporated an appropriate level of contingency of 15%.

*Is it monitored effectively?*

As part of the preparation of the Deposit LDP an effective and appropriate monitoring framework will be developed and included within the Plan and will form the basis for undertaking the Annual Monitoring Report (AMR).

The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted Revised LDP.

The Pre-Deposit Preferred Strategy does not contain a monitoring framework.