

# Denbighshire Local Development Plan

2018 - 2033

Preferred Strategy Consultation Report  
February 2023



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## **Appendices**

Appendix 1 - Invite letter to CT&CCs stakeholder event

Appendix 2 - Invite letter to stakeholders on options

Appendix 3 - Consultation form – draft preferred strategy

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## 1. Introduction

- 1.1 An up-to-date Local development Plan (LDP) is the key part of the plan – led planning system in Wales. The current LDP was adopted 4th June 2013 sets out the Vision, Objectives and strategy for land -use in Denbighshire. Section 69 of the Planning and Compulsory Purchase Act 2004 requires the Council to carry out a full review of the adopted LDP a maximum of four years from the date of adoption. A full review was triggered in 2017 and a Review Report prepared.
- 1.2 The LDP Review Report aims to identify any changes in and updates to the evidence base supporting individual policies and land allocations, new legislation, and local events or circumstances which require a careful consideration of amending individual elements of it. The purpose of the 'LDP Review Report 2017' was to document the Council's approach to this exercise and the conclusions drawn from the results. Information and data were, for example, sought from previous Annual Monitoring Reports (AMRs), changes in legislative requirements, development management records, and new evidence. The review found that fewer new homes had been delivered than required by the LDP and that this had impacted adversely on the delivery of affordable housing. Significant new legislation in the form of the Well-being of Future Generations (Wales) Act 2015 and the Planning (Wales) Act 2015 had been introduced along with the publication of the draft National Development Plan (Now Future Wales 2040). It was concluded that a full review of the LDP was required. Consultation with Key Stakeholders and the public was carried out and the final Review Report was approved by Council in December 2017.
- 1.3 Regulation 15 of the LDP Regulations requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before finally determining the content of its LDP for Deposit. The Preferred Strategy was published in July 2019, representing the completion of a

period of pre-deposit plan preparation and engagement. The Preferred Strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations that will subsequently be included in the Deposit LDP.

- 1.4 Consultation on the Preferred Strategy took place between 8<sup>th</sup> July 2019 and 30<sup>th</sup> August 2019. The deadline for consultation responses was extended to 27<sup>th</sup> September for City Town and Community Councils to enable them to meet and discuss the Preferred Strategy.
- 1.5 LDP Regulation 16a sets out the requirements for the Preferred Strategy consultation. This Initial Consultation Report illustrates how the Council has carried out the participation and consultation on the Preferred Strategy in-line with the requirements of the regulations and also the Community Involvement Scheme (CIS) contained within the Delivery Agreement (DA). The Report identifies the steps taken to publicise plan preparation, in accordance with the CIS, before outlining the specific bodies engaged, summarising the main issues raised and identifying how the responses have been or will be addressed. The Initial Consultation Report provides significant detail on how this key period of consultation will influence development of the Deposit LDP.

## 2. Consultation and Engagement Methods

- 2.1 One of the key aims of the Replacement LDP is to ensure plan production is based on effective community involvement. This is to ensure a range of views can be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were utilised at Preferred Strategy stage to ensure efficient and effective consultation and participation, in accordance with the Community Involvement Scheme.
- 2.2 Engagement on Options – prior to the finalisation of the draft Preferred Strategy a number of engagement sessions were facilitated. A series of consultation events for City Town and Community Councils were held to discuss the strategic options for the replacement LDP. A copy of the invite letter is at Appendix 1. Key stakeholders were invited to submit comments on

strategic options and background papers, copy of the letter at Appendix 2. An internal workshop for elected members to discuss growth and spatial options was also held in January 2019. Officers also attended all Member Area Group meetings in June and July 2019 to brief members on the consultation.

### 2.3 Consultation on the draft Preferred Strategy

2.4 **Council website and consultation portal** – all of the consultation documents were made available on the Denbighshire council website (Welsh and English). The consultation form could be downloaded from the website. A copy of the consultation form can be found at Appendix 3. The County consultation portal was used which enabled consultation responses to be submitted online.

**Council Libraries and One-stop-shops** – in addition to the on-line methods. Paper copies of all of the consultation documents and comments forms were made available in all council libraries and one-stop-shops. Hard copy comments forms could be posted to the LDP team or submitted at the council offices.

**LDP Consultation database** - Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Preferred Strategy Consultation. There were around 1,450 contacts on the LDP database prior to the consultation, they were contacted, provided with details of how to access the package of consultation documents and informed how to respond. A copy of the consultation letter can be found at Appendix 4 The Database includes:

- County Councillors
- City Town and Community Councils, Denbighshire and neighbouring
- Statutory Consultees
- Other Consultees
- Developers / Land Owners
- Individual Members of the Public

**Public Drop in Sessions** - A schedule of exhibitions were arranged across the County, enabling local residents to 'drop in' within the advertised times to discuss the scope of the Preferred Strategy, share opinions and find out how to make formal representations. Development Planning Officers were available at each of the exhibitions to explain the process directly to members of the public and to clarify any queries. Hard copies of the documents and background papers were made available at each exhibition along with bilingual exhibition boards documenting key elements of the Preferred Strategy. The exhibitions were held throughout the consultation period in accordance with the advertised timetable as follows:

Public exhibitions from 2 pm until 7 pm at:-

- Llangollen Town Hall, Castle Street, Llangollen on 17.07.19.
  - Former Granite Outdoors, 64 High Street, Rhyl on 22.07.19.
  - The foyer of Ruthin Library, Record Street, Ruthin on 23.07.19.
- A copy of the leaflet promoting the drop-in sessions, the display board text and the contact form can be found at Appendices 5,6 and 7. The leaflet was distributed to all elected members of the council and City, Town and Community Councils.

**Social Media** – the consultation was promoted via the Council social media accounts and also via press releases. The messages about the consultation were updated regularly throughout the consultation period, particularly as the deadline for responses approached.

**Health Impact Assessment** – a workshop was held, attended by representatives from public health, the health board, neighbouring authorities and internal council departments and elected Members. The workshop was facilitated by Public Health Wales and the Welsh Health Impact Assessment Support Unit. The subsequent report concluded that the wider determinants of health and relevant population groups had been taken into account appropriately.

### 3. The Draft Preferred Strategy and Supporting Documents

### 3.1 Consultation Documents

3.2 The draft Preferred Strategy was published in July 2019. The following documents were made available as part of the public consultation:

- Denbighshire Local Development Plan 2018 – 2033 Preferred Strategy document for consultation.
- Initial Sustainability Appraisal
- Initial Habitats Regulations Appraisal
- Well-being Impact Assessment Report
- Background Paper – Growth Level Options Report
- Background Paper – Spatial Options Report
- Background paper - Settlement Assessment
- Employment Land and Economic Growth Assessment 2021
- Local Housing Market Assessment 2019
- Retail Study 2018
- Town Centre Health Checks 2018
- Joint Housing Land Availability Study 2019
- New Housing Occupancy Survey 2017

All of these documents can be viewed on the council website at

<https://www.denbighshire.gov.uk/en/planning-and-building-regulations/local-development-plan/replacement-local-development-plan/preferred-strategy-pre-deposit-stage.aspx>

The Candidate Sites Register was also published alongside the Preferred Strategy consultation in line with the LDP regulations.

### 3.3 Additional Candidate Sites

In response to the publication of the Candidate Sites Register alongside the Preferred Strategy documents additional candidate sites were submitted. To ensure that communities were aware of all the candidate sites submitted for



consideration in their area and to place all candidate sites on an equal footing, a consultation on the additional sites was undertaken. The consultation was publicised via the LDP database, Denbighshire website and press release. A copy of the consultation letter, press release; consultation forms and FAQs sent to libraries and one-stop-shops can be found at Appendix 8. The consultation ran from 13<sup>th</sup> January 2020 to 13<sup>th</sup> March 2020.

### 3.4 Changes and Updates to the Evidence Base

The consultation on the draft Preferred Strategy took place in 2019. Reporting back on the consultation was delayed due to the pandemic and other factors. Since 2019 there have been changes in National Policy and also in the evidence base for the replacement LDP. This report highlights where any changes have impacted on the Preferred Strategy.

## 4. Responses to the consultation

4.1 Over 2,850 responses were received in relation to the consultation on the Candidate Site Register and the draft Preferred Strategy for the LDP, of these 858 related to the Preferred Strategy. Responses were received from statutory consultees, governmental organisations, non-governmental organisations, city, town and community councils, businesses, landowners, and members of the public.

- The majority of responses were either individual representations, or individual representations submitted on behalf of organisations.
- The majority of responses related to specific sites or areas rather than the overall levels of growth proposed for the County and the general distribution of growth. The fact that we are required to publish the Candidate Sites register alongside the draft Preferred Strategy causes confusion as to the status of the candidate sites with many people assuming they are proposed allocations. This generates a high number of responses to sites that are not the subject of the consultation. The Deposit consultation stage is where we

will include proposed site allocations and any comments should be made at this point.

- 4.2 The consultation response form set out seven key questions and the majority of the report of consultation responses that follows is framed around those questions. The initial sections of the consultation report outline comments made on those parts of the Preferred Strategy that preceded the detailed strategy sections. A copy of the consultation form can be found at Appendix 3. A summary of all comments made is attached as Appendix 9 to this report.
- 4.3 In addition to the questions contained in the consultation comments form, respondents could comment on any other aspect of the draft Preferred Strategy. The sections below outline the comments made on the various parts of the strategy.
- 4.4 Key Issues

The key issues identified in the Preferred Strategy were:

<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 Welsh language and culture.</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>

7 comments received on Key Issues. All of the comments have been responded to under the key policy headings that they fell under.

### **Recommendation – no change to the key issues identified in the Preferred Strategy**

#### 4.5 LDP Vision

The LDP Vision set out the in the Preferred Strategy was:

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.

4.6 5 Comments were made in relation to the LDP Vision. There was general support for the Vision. The need to amend the Vision to include a reference to climate change was highlighted. It is recommended that the Vision

be amended to include the reference to climate change

**Recommendation – that the LDP Vision be amended to include climate change with reference to responsibly using finite resources in the Deposit Plan.**

#### 4.7 LDP Objectives

The LDP Objectives as set out in the Preferred Strategy were:

1.	Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.
2.	Supporting and enhancing the Welsh Language.
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.
6.	Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.
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.

4.8 7 comments were received on the LDP Objectives. Comments all requested additional objectives should be included. Topics raised included climate

change mitigation; reducing carbon emissions, inclusion of active travel and renewable energy.

**Recommendation – that LDP Objective 8 be amended to include a reference to mitigation; reducing carbon emissions; renewable energy and Active Travel in the Deposit Plan.**

#### 4.9 LDP Soundness

One of the key test for the LDP is whether it will be found to be ‘Sound’. It must be established that the Plan preparation requirements have been met and then there are three tests set out that the LDP has to satisfy. A copy of the Tests of Soundness is attached to this report at Appendix 10.

#### **Preparation Requirements**

- 4.10 Limited concern was expressed about the adequacy of the consultation publicity; arrangements and timescales. The sections above set out the extensive lengths that the Council went to in publicising the consultation and making it as accessible as possible. The consultation was carried out in accordance with the approved Community Involvement Scheme; it was held for 8 weeks which is in excess of the minimum 6 week statutory requirement and the deadline for responses was extended for City, Town and Community Councils to respond. In excess of 2,500 responses were received to the consultation which demonstrates that engagement was successful.

#### **4.11 Does the Plan Fit?**

No comments

#### **4.12 Is the Plan Appropriate?**

1 comment from the house building industry that the Plan fails Test 2 as the growth levels proposed for housing are insufficient and that the Plan is insufficiently flexible. The Preferred Strategy uses Welsh Government Household projections as the starting point and the growth levels proposed are above those indicated to allow for growth to meet identified housing need.

A detailed housing trajectory and phasing plan will be included in the Deposit LDP.

#### **4.13 Will the Plan deliver?**

2 comments received, 1 questioning the deliverability of the Bodelwyddan Strategic Site. Section 4.20 below deals with the Bodelwyddan Strategic Site and the associated recommendation responds to this point. The need to demonstrate collaboration with neighbouring authorities was also highlighted and this will be evidenced in a background paper for the Deposit LDP.

#### **4.14 Consultation Form Comments**

The following sections outline the responses received in response to the seven questions posed in the consultation response form.

##### **4.15 Question 1 – Growth levels**

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.

#### **Do you have any comments to make on proposed levels of growth?**

#### **4.16 Responses – Housing Growth**

Approximately 90 responses received. There was general agreement with the housing growth levels in the draft Preferred Strategy. Where concern was expressed regarding growth levels it was often down to a misunderstanding of status of candidate sites and the assumption that they are intended allocations. The need to consider sustainability and environmental factors was raised along with infrastructure capacity concerns. There were varying opinions on whether the proposed growth levels were too high or too low. Some detailed comments were made regarding the types of housing needed and these will all feed into the Deposit LDP policies. Alternative growth scenarios were prepared and considered as discussed in the draft Preferred

Strategy and Background Paper – Growth Level Options Report. There have been no fundamental objections to the housing growth level proposed.

The number of new homes proposed exceeds the most recent Welsh Government household projections and allows for 15% contingency. It is considered that this level of growth will meet the County's needs and is deliverable.

#### **4.17 Responses – Employment Land Growth**

There were few comments made directly on the employment land growth figures as part of the consultation. The draft Preferred Strategy set out an overall level of growth comprising 68 ha of employment land to accommodate a forecasted land requirement of 47.6 ha. This was based on the best available evidence at the time. i.e. BE Group – “Employment Land and Economic Growth Assessment – February 2019”, and Committed sites, i.e. undeveloped land in the adopted LDP or sites with planning permission only. Employment land is specifically allocated for land uses that fall within Use Class B of “The Town and Country Planning (Use Classes) Order 1987” (as amended).

According to the findings in the BE Group report on employment land and economic growth (2021), total employment is forecast to grow by 2,600 jobs over the period 2018 to 2033. Seven of the 12 sectors are predicted to grow, producing 3,100 jobs to 2033. The highest growth sectors are Government Services (+1,300 jobs) and Accommodation and food services (+1,000) and of these government services is only partly on land that would be for B-class employment. Significant declines are forecast in the Construction (-900) and Manufacturing (-700) sectors.

Not all employment growth will result in an increase in demand for B-class employment land or premises. Only certain industry sectors are typically located on B-class land, such as manufacturing, transport and storage and professional services. These sectoral changes are estimates based on a breakdown of national trends and may not adequately account for local dynamics. Using the Cambridge Econometrics forecasts, BE Group has

forecast employment floorspace and employment land requirements for Denbighshire.

Accommodating jobs growth in non B-use class employment sectors will be enabled by specific local policy in the replacement LDP; for example, tourism-based policy to cater for the visitor economy and supporting facilities. This can be done by providing land or by supporting changes of use as part of regeneration efforts.

The economy has fundamentally changed since 2019. Besides the effects of altered trading arrangements with the European Union, the Covid-19 pandemic did not only affect the production process and demand for individual goods but also locational factors such as, production places and office accommodation. In 2021, the Council carried out an update to the previous employment land study to identify any likely variations in forecasted demand. While the 2019 study forecasted an annual need for 2.38 hectares for the period 2018 to 2033, the updated 2021 study projected only an annual need of 1.92 hectares.

The adopted Denbighshire LDP is subject to an Annual Monitoring Report, which includes the delivery of employment land. Monitoring has shown that the forecasted need of 1.92 hectares has not been materialised since 2018. For that reason, the five- year buffer calculation is based on 0.4 hectares, which is the annual average figure of delivered employment land between 2018 and 2021. Updated evidence has accordingly resulted in a reduction in forecasted employment land from 47.6 hectares, as reflected in the draft Preferred Strategy (Consultation Version, May 2019) to 31.81 hectares as proposed in the draft Preferred Strategy (Amendments, 2023).

Officers carried out a review of 'Committed sites' in October 2022. The planning permission for Bodelwyddan Key Strategic Site has expired, which included the provision of 26 hectares of employment land. At the beginning of 2023, there is no indication that an alternative employment site of equal size will be included in the replacement LDP. Review and annual monitoring have also shown the loss of allocated but undeveloped employment land to alternative uses, for example retail. While an over-supply of employment land



signals ambition to the market, it also raises the risk of losing land to alternative uses in unsustainable locations. In summary, the review of 'Committed sites' identified 31.49 hectares of land; excluding 14.67 hectares of land at 'Green Gates Farm', which will be part of the Council's nature reserve project.

The Council carried out a 'call for candidate sites' before drafting the Preferred Strategy. Land for employment purposes was put forward to the total amount of 9.63 hectares. That means, 41.12 hectares of employment land (composed of 'Committed sites' and candidate site submissions) will be available to address the identified, forecasted need of 31.81 hectares.

The reduction in the proposed level of employment land from 68 hectares to 41 hectares in the replacement LDP need to be considered in light of several factors:

- 1) The loss of 26 hectares of employment land at Bodelwyddan Key Strategic Site. Land was made available adjacent to the A55 trunk road to cater for the likely demand in large warehouse space and for haulage businesses. Demand did however not materialise.
- 2) The replacement LDP will contain site allocations and a specific policy on safeguarding existing employment land in line with Welsh Government "Development Plans Manual, Edition 3". Local policy will additionally cover 219 hectares of employment land, which is already developed and serviced. Small businesses are generally looking for this type of premises instead of large and undeveloped sites. There is only little incentive for developers to provide speculative units in an out of centre location in the current economic climate.
- 3) Employment sites are mainly located at the very edges of settlement boundaries. In planning policy terms, Welsh Government strengthened the

'Town Centre first' principal with the aim to provide new employment and business opportunities within established town centres.

- 4) Over-supply of undeveloped, greenfield land for employment purposes does not only increase the risk of losing land to alternative uses but could also undermine the delivery of regeneration projects on brownfield sites, see 'brownfield priority' policy in the adopted LDP.
- 5) There is limited interest from landowners in bringing sites forward for employment use as residential land values are significantly higher. This puts a great constraint on available land in the future.

Recommendation –

**The Preferred Strategy will make provision for a level of growth comprising 41 ha of employment land to accommodate a forecasted land requirement of 31 ha. This will be supported by land for 3,775 new homes to meet a housing requirement of 3,275 dwellings.**

4.18 Question 2 – 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.

**Do you have any comments to make on the proposed spatial strategy?**

**4.19 Spatial Strategy** – (approx. 150 responses) there was general agreement with spatial strategy and settlement hierarchy although there was some concern at the inclusion of Bodelwyddan strategic site and concerns over delivery. In view of the publication of Future Wales 2040 which identifies a regional Growth Area in North Wales and the lack of viability for delivery of the Bodelwyddan Key Strategic Site an amendment to the Spatial Strategy is

likely to be needed. Where concern was expressed regarding the spatial strategy it was often down to a misunderstanding of status of candidate sites and the assumption that they are intended allocations.

#### 4.20 Bodelwyddan Strategic Site

A key change is proposed to the draft Spatial strategy for the replacement LDP, the removal of the Bodelwyddan Strategic Site. It was known that significant infrastructure works; such as a new sewer to Kinmel Bay treatment works, would be required for the key strategic site to progress. The costs of this were a barrier to bringing the site forward and a fixed budget of £10m was included for the site in the North Wales Growth Deal in 2018/19. Since this time, the costs and the likely timescale for completion of the works has increased.

The project was subject to review by Ambition North Wales and as the project would exceed the available budget and not deliver the required outputs as originally agreed there was a recommendation to remove the Bodelwyddan Key Strategic Site from the Growth Deal programme. This was confirmed at the North Wales Economic Ambition Board Meeting on 30<sup>th</sup> September 2022.

The site had been promoted through the LDP and planning process by a development company but they withdrew their interest in the site in 2019. The outline planning consent expired in March 2021 and the site has reverted to an allocation the current LDP and proposed candidate site for the replacement LDP. The agreements between the site promoter and the landowners have all lapsed. Whilst remaining as an allocation in the current LDP it is considered very unlikely that the strategic site can now be delivered.

The Strategic Site in a reduced form was included in the draft Preferred Strategy for the replacement LDP as the planning consent was still valid at that time. This has been reviewed; in light of the decision of the North Wales Economic Ambition Board to remove the site from the Growth Deal programme, and it has been concluded that the removal of the Bodelwyddan Key Strategic Site from the Spatial Strategy of the replacement LDP be recommended to members. A revised spatial strategy is set out below.

The Sustainability Assessment (SA) has highlighted that allowing flexibility in terms of infill and small sites in un-serviced settlements needs careful consideration. The SA report requires that there be consideration as to how to assess and mitigate effects, particularly cumulative effects, arising from permitting development in un-serviced settlements.

**Recommendation - Having regard to Placemaking and the principles of sustainable development, which include consideration of available infrastructure, the Spatial Strategy will focus development in the top three tiers of the settlement hierarchy (main centres; local centres, and villages) with limited growth in un-serviced settlements that focusses on meeting local needs. Development shall be resilient to the effects of climate change and be delivered within the means of the natural environment.**

#### 4.21 Question 3 – Key policies

13 key policies were proposed in the Preferred Strategy consultation

Local Development Plan 2018 – 2033  
Draft Preferred Strategy: **Draft Key Policies**

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Placemaking Welsh Language Housing Affordable Housing Employment Land	Retail Bodelwyddan Strategic Site Infrastructure Visitor Economy	Transport & Accessibility Minerals Waste Management Natural & Built Environment
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**Do you have any comments to make on the proposed key policies?**

#### 4.22 Placemaking

### 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.**

Around 20 comments made on the Placemaking policy. Policy was supported in general. Comments related to the need to include renewable energy; climate change and zero carbon aspects. One respondent voiced concern around the impact on the viability of sites if requirements are too onerous. Viability will feature in the assessment of candidate sites. It was also suggested that bullet point 3 be amended to replace maintenance with conservation which is a recommended change.

### **Recommendation**

**That bullet point 3 be amended to replace ‘maintenance’ with ‘conservation’, and that additional key policies relating to climate change; reducing carbon emissions and renewable energy be included in the Deposit LDP.**

## 4.23 Welsh Language

### **Welsh Language**

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

Around 15 comments were received on the Welsh Language policy. Comments were generally supportive and emphasised the importance of maintaining and enhancing the language. 2 comments felt that too much importance was placed on the Welsh language and that it shouldn't be used to limit or prohibit development. Welsh Language has been considered in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of the Welsh Language will occur to inform development of detailed policies to be consulted upon as part of the Deposit LDP.

**Recommendation – there are no proposed changes to key policy - Welsh Language.**

#### 4.24 Housing

### **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.**

Around 15 comments were received on the Housing policy. This ties in with the comments on the growth strategy outlined above. Comments focussed mainly on the need to ensure that a range of tenures and house types and sizes are provided to meet needs.

**Recommendation – there are no proposed changes to key policy - Housing.**

#### 4.25 Affordable Housing

### **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.**

Around 35 responses received. Significant support for the provision of affordable housing to meet a variety of needs within the county. Many felt that the affordable housing requirement should be raised from the 750 quoted in the Key Policy, others referenced the need to take account of viability when devising affordable housing percentages on sites. Evidence from the Annual Monitoring Reports demonstrates that affordable housing delivery since the start of the replacement LDP plan period in 2018 has been over 600 homes. In light of this it

is considered appropriate to consider raising the affordable housing target in the replacement LDP to ensure the continued delivery of affordable housing against need. The target will be amended and informed by the completion of the 2023 Local Housing Market Assessment.

**Recommendation – that key policy affordable Housing be amended in the Deposit LDP and the affordable housing target be increased to reflect the results of the latest Local Housing Market Assessment.**

#### 4.26 Employment Land

### **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.**

Around 10 comments received. Comments were supportive with localised suggestions for potential employment sites.

**Recommendation – there are no proposed changes to key policy Employment Land.**

#### 4.27 Town Centres and Retail Development

### **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>

Around 10 comments on the key retail policy. Support for the policy but stressed the need to consider retail opportunities in rural areas as well as town centres.

**Recommendation – there are no proposed changes to key policy Town Centres and Retail Development. Additional policies relating to provision in smaller settlements to be included in the Deposit LDP.**

#### 4.28 Bodelwyddan Strategic Site

### **Bodelwyddan Strategic Site**

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.

Around 12 comments on the Bodelwyddan Strategic Site policy. It is proposed that the Bodelwyddan Strategic Site be removed from the Preferred Strategy, and this is discussed above.

**Recommendation – delete key policy Bodelwyddan Strategic site and remove all references to the site from the Preferred Strategy.**

#### 4.29 Infrastructure



## Infrastructure

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:

- Affordable housing
- Recreation, open space and green infrastructure
- Education
- Sustainable transport and active travel
- Regeneration
- Welsh language
- Telecommunications and Broadband
- Any other Council priorities identified at the time of the application.

Around 43 comments were made on Key Policy Infrastructure. The policy was generally supported and it was stressed that new development should make an appropriate contribution towards infrastructure needs including those relating to water management. Concerns were expressed about the capacity of the existing infrastructure networks to accommodate additional development and the related impacts on climate change. More detailed policies were requested for a number of topic areas which will be included in the Deposit LDP,

**Recommendation – amend Key Policy Infrastructure to include a reference to water management infrastructure.**

### 4.30 Visitor Economy

## 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.**

Around 9 comments received on Key Policy Visitor Economy. Respondents were supportive of the policy and the recognition of the positive economic impacts of

tourism. There was a suggestion to amend the wording to ‘conserve and enhance’ to strengthen the policy.

**Recommendation – amend Key Policy Visitor Economy to include ‘conserve and enhance’ the county’s natural and built environment.**

#### 4.31 Transport and accessibility

##### **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.**

Around 16 comments made on the key Transport and Accessibility policy. Majority of the comments related to the need to improve sustainable travel such as walking and cycling. Respondents emphasised the need to include references to Active Travel in the LDP objectives.

**Recommendation – there are no proposed changes to key policy Transport and Accessibility. LDP objectives to be amended to include reference to Active Travel**

#### 4.32 Minerals

##### **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.**

4 comments received on key policy Minerals. Comments stressed the need to take account of the latest Regional Technical Statement on minerals, potential impacts on the AONB and the need to balance the safeguarding of minerals against the need for land for housing.

**Recommendation – there are no proposed changes to key policy - Minerals.**

#### 4.33 Waste Management

##### **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.**

2 comments received on key policy Waste Management. Comments were supportive subject to the need to encourage waste reduction and environmental safeguards.

**Recommendation – there are no proposed changes to key policy - Waste Management.**

#### 4.34 Natural and Built Environment

##### **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.**

Around 34 comments received on key policy Natural and Built Environment. Comments focussed on environmental concerns relating to development ; flood risk and the need to protect green spaces. Many comments related to issues that will be covered by a range of more detailed policies in the Deposit LDP and the comments made will inform these.

**Recommendation – there are no proposed changes to key policy - Natural and Built Environment.**

4.35 A number of other detailed policy areas were suggested for inclusion which will be included as detailed policies in the Deposit LDP.

4.36 Sustainability Appraisal

**Do you have any comments to make on the Sustainability Appraisal (SA)?**

Around 30 comments received in relation to the Sustainability Appraisal (SA). The SA was generally supported with comments relating to specific aspects and the need for more detailed policies at the Deposit Stage. The SA is an iterative document and will be updated to reflect changes to the LDP as it is progressed. The latest version of the SA which assessed the potential impacts of the proposed changes to the Preferred Strategy following consultation can be found at Appendix 11. The results of the updated SA have informed the final proposed changes to the Preferred Strategy.

**The proposed changes, following consultation, to the Preferred Strategy have undergone a sustainability assessment and the results have informed the final Preferred Strategy. The Updated Sustainability Assessment of the Replacement LDP can be found at Appendix 11**

4.37 Habitats Regulation Assessment

**Do you have any comments to make on the Habitats Regulations Assessment (HRA)?**

- 4.37 Around 20 comments made relating to the HRA. Respondents found the HRA of the preferred strategy to be acceptable. Many respondents focussed on the perceived environmental effects of past development in their local areas.
- 4.38 The Habitats Regulations Assessment (HRA) is an iterative process which results in the need to carry out an assessment at all principal stages in the LDP preparation process. Officers have assessed all recommended changes to the draft Preferred Strategy (see Appendix 12) to identify any future difficulties in terms of avoiding the occurrence of likely significant effects on the qualifying features of Special Areas of Conservation and Special Protection Areas in and adjacent to Denbighshire's borders.

**The proposed changes, following consultation, to the Preferred Strategy have undergone a Habitats Regulations Assessment (HRA) and the results have informed the final Preferred Strategy. The Updated HRA of the Replacement LDP can be found at Appendix 12**

## 5. Candidate Sites

- 5.1 A significant number of responses received related to the Candidate Sites Register which the Council is required to publish alongside the Preferred Strategy but does not form part of the consultation. All candidate sites will be evaluated using the Candidate Sites Assessment Methodology and the site recommended for inclusion will form part of the consultation on the Deposit LDP. The comments made in relation to candidate sites during the Preferred Strategy consultation will inform the site assessments.



Eich cyf/Your ref

Ein cyf/Our ref

Dyddiad/Date 25/01/2019

Rhif union/Direct dial 01824 706916

e-bost/e-mail poliscynllunio

@sirddinbych.gov.uk

planningpolicy

@denbighshire.gov.uk

Annwyl Syr / Fadam

**Cynllun Datblygu Lleol Sir Ddinbych  
2018-2033 -  
Digwyddiadau Cyngorau Dinas, Tref a  
Chymuned**

Mae Cyngor Sir Ddinbych newydd ddechrau llunio Cynllun Datblygu Lleol newydd a fydd yn arwain datblygiadau yn y dyfodol yn y sir. Rwy'n ysgrifennu i'ch gwahodd chi i sesiwn 'galw heibio' lle gallwch gymryd rhan yn y cam cyfredol a helpu llunio cynnwys y CDLI.

Bydd y sesiynau galw heibio yn gyfle i Gyngorau Dinas, Tref a Chymuned i ddylanwadu ar y twf a ddylai ddigwydd, a ble y dylid lleoli hyn, ar draws y Sir yn gyffredinol. Nodwch ein bod ond yn ystyried lefel a dosbarthiad twf y dyfodol **ledled y sir** ar hyn o bryd. Bydd safleoedd penodol a lefelau twf ar gyfer pob tref/ pentref yn cael eu hystyried yn ddiweddarach yn y broses.

Papurau i ddilyn.

Cynhelir y sesiynau galw heibio ar:

- 4 Chwefror 2019 – 3-6:30pm, Caledfryn, Ffordd Y Ffair, Dinbych, LL16 3RJ
- 5 Chwefror 2019 – 4-7pm Neuadd y Sir, Ffordd Wynnstay, Rhuthun, LL15 1YN
- 7 Chwefror 2019 – 4-7pm, Canolfan Gymunedol Rhuddlan, Stryd y Senedd, Rhuddlan, LL15 5AW.

Dear Sir / Madam

**Denbighshire Local Development Plan  
2018-2033 –  
City, Town & Community Council events**

Denbighshire County Council is in the early stages of producing a new Local Development Plan (LDP), which will guide future development in the county. I am writing to invite you to attend a 'drop-in' session where you can get involved in the current stage and help shape the content of the LDP.

The drop-in sessions will be an opportunity for City, Town & Community Councils to influence how much growth there should be, and where this should be located, across the County as a whole. Please note we are only considering the **countywide** level and distribution of future growth at this stage. Specific sites and growth levels for each town/village will be considered at a later stage in the process.

Papers to follow.

The drop-in sessions will be held on:

- 4<sup>th</sup> February 2019 – 3-6:30pm, Caledfryn. Smithfield Road, Denbigh, LL16 3RJ
- 5<sup>th</sup> February 2019 – 4-7pm, County Hall, Wynnstay Road, Ruthin, LL15 1YN
- 7<sup>th</sup> February 2019 – 4-7pm, Rhuddlan Community Centre, Parliament Street, Rhuddlan, LL15 5AW.

I gael rhagor o wybodaeth, cysylltwch â'r Tîm Cynllunio Strategol a Thai gan ddefnyddio'r manylion cyswllt uchod.

For further information, please contact the Strategic Planning and Housing Team using the contact details above.

Yn gywir / Yours faithfully



**Angela Loftus**

Rheolwr Cynllunio Strategol a Thai/ Strategic Planning and Housing  
Manager

Cynllunio Strategol a Thai, Cyngor Sir Ddinbych, Blwch Post 62, Rhuthun, LL15 9AZ  
Strategic Planning and Housing, Denbighshire County Council, PO Box 62, Ruthin, LL15 9AZ



[www.sirddinbych.gov.uk](http://www.sirddinbych.gov.uk)

[www.denbighshire.gov.uk](http://www.denbighshire.gov.uk)

Eich cyf/Your ref

Ein cyf/Our ref

Dyddiad/Date 08/02/2019

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planningpolicy

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Annwyl Syr / Fadam

Dear Sir / Madam

**Cynllun Datblygu Lleol Sir Ddinbych  
2018-2033 -  
Ymgysylltu â Budd-ddeiliaid Allweddol**

**Denbighshire Local Development Plan  
2018-2033 -  
Key Stakeholder Engagement**

Mae Cyngor Sir Ddinbych newydd ddechrau llunio Cynllun Datblygu Lleol newydd a fydd yn arwain datblygiadau yn y dyfodol yn y sir. Rydym wrthi ar hyn o bryd yn gofyn am farn anffurfiol am nifer o Ddewisiadau Twf a Gofodol a allai ffurfio'r Strategaeth a Ffefrir ar gyfer y Cynllun. Rwy'n ysgrifennu i'ch gwahodd chi a'ch sefydliad i roi sylwadau am y dewisiadau hyn o ran cyflawnadwyedd, gofynion isadeiledd cefnogol a chyfyngiadau posib. I'ch cynorthwyo, mae nodyn briffio a thri papur cefndir ynghlwm â'r e-bost hwn.

Denbighshire County Council is in the early stages of producing a new Local Development Plan (LDP), which will guide future development in the county. We are currently in the process of seeking informal views on a number of Growth and Spatial Options that could form the Preferred Strategy for the Plan. I am writing to invite you and your organisation to provide comments on these options with regard to deliverability, supporting infrastructure requirements and potential constraints. To assist you, a briefing note and three background papers have been attached to this email.

Nodwch ein bod ond yn ystyried lefel a dosbarthiad twf y dyfodol **ledled y sir** ar hyn o bryd. Bydd safleoedd penodol a lefelau twf ar gyfer pob tref/ pentref yn cael eu hystyried yn ddiweddarach yn y broses. Serch hynny, buaswn yn gwerthfawrogi petaech yn cyflwyno unrhyw wybodaeth ychwanegol y dylai fy nhîm fod yn ymwybodol ohono wrth edrych ar ddyraniadau tir posibl ac wrth lunio polisi lleol. Y fantais i'ch sefydliad yw mwy o sicrwydd dros dwf yn y dyfodol a'r galw posibl am wasanaeth yn Sir Ddinbych.

Please note we are only considering the **countywide** level and distribution of future growth at this stage. Specific sites and growth levels for each town/village will be considered at a later stage in the process. I would, nevertheless, appreciate the submission of any additional information that my team should be aware of when looking at potential land allocations and drafting local policy. The benefit to your organisation is greater certainty over future growth and the potential demand for services in Denbighshire.

Buaswn yn gwerthfawrogi unrhyw wybodaeth ac adborth o fewn 14 diwrnod o ddyddiad yr e-bost hwn. I gael rhagor o wybodaeth, cysylltwch â'r Tîm Cynllunio Strategol a Thai gan ddefnyddio'r manylion cyswllt isod.

It is appreciated to receive any information and feedback within 14 days of the date of



this e-mail. For further information, please contact the Strategic Planning and Housing Team using the contact details below.

Yn gywir / Yours faithfully



**Angela Loftus**

Rheolwr Cynllunio Strategol a Thai/ Strategic Planning and Housing  
Manager

Cynllunio Strategol a Thai, Cyngor Sir Ddinbych, Blwch Post 62, Rhuthun, LL15 9AZ Strategic Planning and Housing, Denbighshire County Council, PO Box 62, Ruthin, LL15 9AZ
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[www.denbighshire.gov.uk](http://www.denbighshire.gov.uk)

## Local Development Plan 2018 – 2033

### Draft Preferred Strategy: **Consultation Form**

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Denbighshire County Council would like to hear your views on the Local Development Plan 2018 – 2033. Draft Preferred Strategy and we will be consulting on this document from **08/07/2019** to **30/08/2019**. 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, libraries and one stop shops.

The closing date for submission of comments on the Denbighshire LDP Preferred Strategy is **30/08/2019**.

Once completed, please return your comments form to:

Strategic Planning & Housing Team

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)

Please contact the Strategic Planning & 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 : 01824 706916.

**All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation.**

**Your contact details will not be released to any third parties and will only be used for the purposes of Denbighshire's Local Development Plan process. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.**

Local Development Plan 2018 – 2033  
 Draft Preferred Strategy: **Contact Details**

---

	Personal Details	Agent Details (If Applicable)
Name:		
Organisation (If Applicable):		
Address:		
Postcode:		
Telephone No:		
Email:		

Do you wish to be kept informed regarding future stages of the Plan's preparation?		
Preferred means of contact		
Do you wish to correspond in English or Welsh?		

## Local Development Plan 2018 – 2033

### Draft Preferred Strategy: **Proposed Level of Growth**

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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.

Do you have any comments to make on proposed levels of growth?

Please comment below:

## Local Development Plan 2018 – 2033

### Draft Preferred Strategy: **Proposed Spatial Strategy**

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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.

Do you have any comments to make on the proposed spatial strategy?  
Please comment below:

## Local Development Plan 2018 – 2033

### Draft Preferred Strategy: **Draft Key Policies**

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Placemaking	Retail	Transport & Accessibility
Welsh Language	Bodelwyddan Strategic Site	Minerals
Housing	Infrastructure	Waste Management
Affordable Housing	Visitor Economy	Natural & Built Environment
Employment Land		

Do you have any comments to make on the Draft Key Policies?  
Please comment below:

**(Please specify which Policy / Policies you are commenting on)**

Are there any other policies that should be included?  
Please comment below:

Local Development Plan 2018 – 2033

Draft Preferred Strategy: **Sustainability Appraisal (SA)**

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Do you have any comments to make on the Sustainability Appraisal (SA)?  
Please comment below:

Local Development Plan 2018 – 2033

Draft Preferred Strategy: **Habitats Regulations Appraisal (HRA)**

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Do you have any comments to make on the Habitats Regulations Appraisal (HRA)? Please comment below:

Local Development Plan 2018 – 2033

Draft Preferred Strategy: **Candidate Sites Register**

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If you wish to comment on any of the proposed Candidate Sites please do so below.

**All comments should include the reference number of the particular site they refer to.**

Local Development Plan 2018 – 2033

Draft Preferred Strategy: **Any Other Comments**

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Are there any other comments that you would like to make on the Draft Preferred Strategy?

Please comment below:



## Local Development Plan 2018 – 2033

### Draft Preferred Strategy

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Thank you for your comments on the Draft Preferred Strategy

If you have any further questions or require any assistance, please do not hesitate to contact the Strategic Planning & Housing Department on: 01824 706916 or email: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk).

Completed forms should be returned to:

Strategic Planning & Housing Team

Denbighshire County Council

PO Box 62

Ruthin

LL15 9AZ

Or emailed to: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

Comments must be received by 5pm on **30/08/2019**

**Comments made after this time may not be considered.**

Eich cyf/Your ref

Ein cyf/Our ref

Dyddiad/Date 05/07/2019

Rhif union/Direct 01824 706916

dial

e-bost/e-mail [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

[planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

Annwyl Syr / Fadam

Dear Sir / Madam

**Cynllun Datblygu Lleol Sir Ddinbych 2018-2033: Ymgynghoriad ynghylch y Strategaeth a Ffeirir Ddrafft**

Ar 14 Mai 2019 cymeradwyodd Cyngor Sir Ddinbych y Strategaeth a Ffeirir Ddrafft y CDLI at ddibenion ymgynghori cyhoeddus.

Mae'r strategaeth ddrafft hon yn cynrychioli'r cam ffurfiol cyntaf i gynhyrchu Cynllun Datblygu Lleol Newydd ar gyfer Sir Ddinbych, sef cam y 'Strategaeth a Ffeirir'.

Unwaith y bydd y Cyngor wedi cymeradwyo fersiwn ddrafft o'r CDLI Newydd sef, yn ôl pob tebyg, yn 2021, bydd y CDLI Newydd yn dylanwadu ar dwf a datblygiad yn y sir tan 2033.

Mae'r ymgynghoriad ynghylch y Strategaeth a Ffeirir Ddrafft yn amlygu'r **materion defnydd tir allweddol** sydd angen sylw yn y sir hyd at 2033. Mae hyn yn cynnwys lefel gyffredinol y twf datblygu ar gyfer tir tai a chyflogaeth, lle bydd y twf hwnnw yn cael ei gyfeirio o ran lleoliad, a nifer o bolisiâu cynllunio defnydd tir strategol.

Ynghlwm wrth ddogfen y Strategaeth a Ffeirir Ddrafft ceir cyfres o ddogfennau ategol sydd hefyd yn ffurfio rhan o'r ymgynghoriad hwn. Mae'r rhestr lawn o ddogfennau ymgynghori yn cynnwys:

- Y Strategaeth Ddrafft a Ffeirir
- Arfarniad cynaliadwyedd
- Arfarniad Rheoliadau Cynefinoedd

**Denbighshire Local Development Plan (LDP) 2018- 2033: Draft Preferred Strategy Consultation**

Denbighshire County Council approved the Draft LDP Preferred Strategy for public consultation on 14<sup>th</sup> May 2019.

The Draft LDP Preferred Strategy represents the first formal stage of producing the replacement Denbighshire Local Development Plan (LDP) and is referred to as the 'Preferred Strategy' stage.

Once the final draft version of the replacement LDP has been approved by the Council, which is expected to be in 2021, the new Denbighshire LDP will guide future growth and development in the County up to 2033.

The Draft Preferred Strategy consultation sets out the **key land use issues** that are required to be addressed in the County up to 2033. This includes the overall level of development growth for housing and employment land, where that growth will broadly be directed to in terms of location, and a number of strategic land use planning policies.

The Draft Preferred Strategy document is accompanied by a series of supporting documents which also form part of this consultation. The full list of consultation documents includes:

- Draft Preferred Strategy;
- Sustainability Appraisal;

- Cofrestr Safleoedd Posibl

Mae'r Gofrestr Safleoedd Posibl yn cynnwys yr holl safleoedd sydd wedi'u cyflwyno i'w hystyried yn y CDLI Newydd, ond nid yw'n cynnwys unrhyw benderfyniad i gynnwys unrhyw safle. Bydd dyrannu safleoedd unigol a pholisiâu cynllunio manwl yn cael eu hystyried yn ystod ail gam y broses o greu'r cynllun – y CDLI i'w Harchwilio gan y Cyhoedd – a fydd yn destun ymgynghoriad cyhoeddus yn 2020.

Mae arnom ni eisiau gwybod a yw'r Strategaeth a Ffeirir Ddrafft yn briodol ar gyfer y sir ac a yw'r holl faterion allweddol wedi'u nodi a derbyn sylw.

Mae'r Strategaeth a Ffeirir Ddrafft ar gael yn y Siopau Un Alwad a'r Llyfrgelloedd, ac ar wefan y Cyngor

yn  
<https://www.sirddinbych.gov.uk/cy/preswylwr/rheoliadau-cynllunio-ac-adeiladu/cynllun-datblygu-lleol/cynllun-datblygu-lleol-newydd/cynllun-datblygu-lleol-newydd-2018-2033.aspx>

Mae cyfres o arddangosfeydd wedi'u trefnu ar draws y sir i egluro mwy am broses y CDLI a'r ymgynghoriad ynghylch y Strategaeth a Ffeirir Ddrafft:

- 17 Gorffennaf 2019 2pm – 7pm Neuadd y dref Llangollen, Heol Y Castell, Llangollen, LL20 8NU
- 22 Gorffennaf 2019 2pm – 7pm Former Granite Outdoors, 64 Y Stryd Fawr, Y Rhyl, LL18 1TW
- 23 Gorffennaf 2019, 2pm – 7pm Llyfrgell Rhuthun, Stryd y Llys, Rhuthun, LL15 1DS

Bydd yr ymgynghoriad yn para wyth wythnos ac yn dechrau ar 8 Gorffennaf 2019 tan 30 Awst 2019. Fel y gwelwch, rydym ni wedi rhagori ar y cyfnod ymgynghori statudol o 6 wythnos er mwyn rhoi cyfle go iawn i bobl gymryd rhan yn yr ymgynghoriad.

Hoffem glywed eich barn am y Strategaeth a Ffeirir Ddrafft, a gallwch gyflwyno sylwadau fel a ganlyn:

 Drwy'r porth ymgynghori yn  
<https://countyconversation.denbighshire.gov.uk/project/447>

- Habitats Regulations Appraisal; and
- Candidate Sites Register.

The Candidate Sites Register simply presents all the sites that have been submitted for consideration in the replacement LDP, but does not indicate any decision to include any of them. Individual site allocations and detailed planning policies will be considered at the second stage in the Plan-making process – the Deposit LDP – which will be subject to public consultation in 2020.

We are seeking your views on whether the Draft Preferred Strategy is the right one for the County and whether all the key issues have been identified and addressed.

The Draft Preferred Strategy is available at all One Stop Shops and libraries, and on the Council's web site  
<https://www.denbighshire.gov.uk/en/resident/planning-and-building-regulations/local-development-plan/replacement-ldp/replacement-local-development-plan-2018-2033.aspx>

A series of exhibitions have been arranged throughout the County to explain more about the LDP process and the Draft Preferred Strategy consultation as follows:

- 17<sup>th</sup> July 2019 2pm – 7pm Llangollen Town Hall, Castle Street, Llangollen, LL20 8NU
- 22<sup>nd</sup> July 2019 2pm – 7pm Former Granite Outdoors, 64 High Street, Rhyl, LL18 1TW
- 23<sup>rd</sup> July 2019 2pm – 7pm Ruthin Library, Record Street, Ruthin, LL15 1DS

The consultation will last for eight weeks commencing on 8<sup>th</sup> July 2019 until 30<sup>th</sup> August 2019. As you can see we have gone beyond the statutory six week consultation period required in a genuine attempt to allow full participation in the consultation of the Draft Preferred Strategy.

We would like to hear your views on the Draft Preferred Strategy and you can make comments in any of the following ways:

 via the consultation portal  
<https://countyconversation.denbighshire.gov.uk/project/447>

☒ Drwy'r post yn defnyddio'r ffurflen ymgynghori:

Cynllunio Strategol a Thai  
Cyngor Sir Ddinbych  
Blwch Post 62,  
Rhuthun,  
LL15 9AZ

📧 Drwy  
[polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

Bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd ac yn cael eu hadrodd wrth y Cabinet a'r Cyngor fel rhan o'r adroddiad am yr ymgynghoriad.

Os oes gennych chi unrhyw gwestiwn am y CDLI fe allwch chi hefyd ffonio Tîm y CDLI ar 01824 706916 yn ystod oriau agor arferol y swyddfa.

☒ by post using the consultation comments form to:

Strategic Planning and Housing  
Denbighshire County Council  
PO Box 62,  
Ruthin,  
LL15 9AZ

📧 by email:  
[planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation.

If you have any general enquiries about the LDP you can also telephone the LDP Team on 01824 706916 during normal office hours.

Yn gywir / Yours faithfully



**Angela Loftus**  
Rheolwr Cynllunio Strategol a Thai/ Strategic Planning and Housing  
Manager

Cynllunio Strategol a Thai, Cyngor Sir Ddinbych, Blwch Post 62, Rhuthun, LL15 9AZ Strategic Planning and Housing, Denbighshire County Council, PO Box 62, Ruthin, LL15 9AZ
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### Diogelu Data yn y DU 2018 (RhDDC)

I gael rhagor o wybodaeth am sut mae Cyngor Sir Ddinbych yn prosesu data personol a'ch hawliau, gwelwch ein hysbysiad preifatrwydd ar ein gwefan –  
[www.sirddinbych.gov.uk/preifatrwydd](http://www.sirddinbych.gov.uk/preifatrwydd)

### UK Data Protection 2018 (GDPR)

For further information about how Denbighshire County Council processes personal data and your rights please see our privacy notice on our website –  
[www.denbighshire.gov.uk/privacy](http://www.denbighshire.gov.uk/privacy)

## Denbighshire's Local Development Plan (LDP) 2018-2033

### Consultation on the Draft Preferred Strategy: 08.07.2019 until 30.08.2019

We are asking people to help the Council to plan ahead and get involved with consultation on the new Local Development Plan (LDP) by looking at the high level strategy set out in the Draft Preferred Strategy and looking at the sites that have been submitted to be considered in the new LDP.

This is the Pre-Deposit stage of developing a plan. It is the 1<sup>st</sup> formal stage when you, the public, can make your comments. The documents available for consultation are the Draft Preferred Strategy, Sustainability Appraisal, Habitats Regulations Appraisal and Candidate Site Register. The documents are available online at [www.denbighshire.gov.uk/ldp](http://www.denbighshire.gov.uk/ldp) or can be viewed at libraries, one-stop shops and at drop-in events.

Public exhibitions from 2 pm until 7 pm at:-

- Llangollen Town Hall, Castle Street, Llangollen on 17.07.19.
- Former Granite Outdoors, 64 High Street, Rhyl on 22.07.19.
- The foyer of Ruthin Library, Record Street, Ruthin on 23.07.19.

## Cynllun Datblygu Lleol Sir Ddinbych 2018-2033

### Ymgynghoriad ar y Strategaeth Drafft A Ffefrir: 08.07.2019 tan 30.08.2019

Rydym yn gofyn i bobl helpu'r Cyngor i gynllunio ymlaen a bod yn rhan o'r ymgynghoriad ar y Cynllun Datblygu Lleol newydd drwy edrych ar y strategaeth lefel uchel a nodir yn y Strategaeth Ddrafft a Ffefrir, ac edrych ar safleoedd sydd wedi cael eu cyflwyno i'w hystyried yn y Cynllun Datblygu Lleol newydd.

Dyma'r cam Cyn-Adneuo o ddatblygu cynllun. Hwn yw'r cam ffurfiol cyntaf lle cewch chi, y cyhoedd wneud eich sylwadau. Y dogfennau sydd ar gael i ymgynghori arnynt yw y Strategaeth Ddrafft a Ffefrir, yr Arfarniad o Gynaliadwyedd, Arfarniad Rheoliadau Cynefinoedd a Chofrestr Safle Ymgeisydd. Mae'r dogfennau i'w gweld ar- lein yn [www.sirddinbych.gov.uk/cdll](http://www.sirddinbych.gov.uk/cdll) a hefyd i'w gweld mewn llyfrgelloedd, siopau un alwad a digwyddiadau galw heibio.

Arddangosfeydd cyoeddus o 2 pm tan 7 pm yn:-

- Neuadd y Dref Llangollen, Stryd y Castell, Llangollen ar 17.07.19.
- Yr Hen Granite Outdoors, 64 Stryd Uchel, Y Rhyl ar 22.07.19.
- Nghyntedd Llyfrgell Rhuthun, Stryd y Cofnod, Rhuthun ar 23.07.19.

## How do I find out about the high level strategy?

The high level strategy and key policies are contained within the Draft Preferred Strategy. It sets out the preferred level of growth in terms of housing and employment and how that level of growth will be spatially distributed throughout Denbighshire. Key policies are designed to guide development and ensure that the social, economic and environmental needs of the county are met.

## How do I make my comments?

All comments are welcome. Comments in support of the LDP are as important as objections.

- Use the consultation portal available at:  
<https://countyconversation.denbighshire.gov.uk/project/447>
- Complete a consultation response form available
  - a) Online at [www.denbighshire.gov.uk/ldp](http://www.denbighshire.gov.uk/ldp)
  - b) From libraries and one-stop shops

and return it by either emailing  
[planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk) or

by posting it to Strategic Planning and Housing  
Denbighshire County Council  
PO Box 62, Ruthin, LL15 9AZ

**All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation.**

## Sut wyf yn cael gwybodaeth am y strategaeth lefel uchel?

Mae'r strategaeth lefel uchel a'r polisïau allweddol wedi'u cynnwys yn y Strategaeth Ddrafft a Ffefrir. Mae'n nodi'r lefel o dwf a ffefrir o ran tai a chyflogaeth a sut y bydd y twf hwnnw'n cael ei wasgaru ar draws Sir Ddinbych. Mae polisïau allweddol wedi'u dylunio i arwain datblygiadau a sicrhau bod anghenion cymdeithasol, economaidd ac amgylcheddol y sir yn cael eu diwallu.

## Sut wyf yn gwneud fy sylwadau?

Croesawir sylwadau. Mae sylwadau i gefnogi'r CDLI mor bwysig â'r gwrthwynebiadau.

- Defnyddio'r porth ymgynghori sydd ar gael yn:  
<https://countyconversation.denbighshire.gov.uk/projectcy/447>
- Llenwi ffurflen ymateb i'r ymgynghoriad sydd ar gael
  - a) Ar-lein yn [www.sirddinbych.gov.uk/cdli](http://www.sirddinbych.gov.uk/cdli)
  - b) Mewn llyfrgelloedd a siopau un alwad

a'i dychwelyd drwy anfon e-bost  
[polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

neu ei phostio at: Cynllunio Strategol a Thai  
Cyngor Sir Ddinbych  
Blwch Post 62, Rhuthun, LL15 9AZ

**Bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd ac yn cael eu hadrodd wrth y Cabinet a'r Cyngor fel rhan o'r adroddiad am yr ymgynghoriad.**



# Cynllun Datblygu Lleol Sir Ddinbych (CDLI) 2018 - 2033



## Beth ydi CDLI?

Cynllun sydd yn cynnwys polisiau a dyraniadau tir er mwyn arwain datblygu cynaliadwy yn Sir Ddinbych hyd at 2033.

Bydd y CDLI presennol yn dod i ben ar ddiwedd 2021 ac rydym angen CDLI newydd yn ei in its place.

## Sut allwch chi helpu?

Rhowch eich sylwadau (cadarnhaol neu negyddol) am:

- y strategaeth lefel uchel sydd wedi'i gynnwys yn y Strategaeth Ddrafft a Ffefrir
- a'r dogfennau ymgynghori eraill: yr Arfarniad o Gynaliadwyedd, Arfarniad Rheoliadau Cynefinoedd a Chofrestr Safleoedd Posibl.

Mae'r ymgynghoriad ar agor am 8 wythnos a bydd yn dod i ben ar 30.8.19.

## Sut wyf yn gwneud fy sylwadau?

Defnyddiwch y porth ymgynghori sydd ar gael yn

<https://countyconversation.denbighshire.gov.uk/projectcy/447> neu

Llenwch ffurflen ymateb i'r ymgynghoriad sydd ar gael

Ar-lein: [www.sirddinbych.gov.uk/cdli](http://www.sirddinbych.gov.uk/cdli)

b) Mewn llyfrgelloedd a siopau un alwad.

Dychwelwch y ffurflen naill ai ar

e-bost: [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk); neu

ei phostio at: Cynllunio Strategol a Thai, Cyngor Sir Ddinbych  
Blwch Post 62, Rhuthun, LL15 9AZ.

**Cysylltwch â ni: 01824 706916**

# Cynllun Datblygu Lleol Sir Ddinbych (CDLI) 2018 - 2033

Dyma'r cam cyntaf o lunio'r cynllun datblygu newydd ar gyfer Sir Ddinbych. Mae'r cam yma'n gosod y strategaeth lefel uchel. Nid oes unrhyw safle'n cael ei ddyrannu yn ystod y cam yma.

## Beth ydi'r strategaeth lefel uchel?

Faint o ddatblygu (lefel twf arfaethedig) a ddylai fod ar draws y Sir gyfan hyd at 2033 ac ym mhle y dylai'r datblygu ddigwydd (strategaeth ofodol).

## Lefel Twf Arfaethedig

Dros gyfnod y cynllun, 15 mlynedd, tan 2033 :-

- Tir cyflogaeth – dyrannu 68 hectar o dir ar gyfer defnydd cyflogaeth.
  - Cartrefi newydd - dyrannu tir ar gyfer adeiladu 3,775 o gartrefi newydd.
- Byddant yn cael eu darparu trwy amrywiaeth o ddulliau, gan gynnwys y rhai a gwblhawyd ar ôl Ebrill 2018.

## Dweud eich dweud:

- ❖ Faint o dai ydych chi'n meddwl sydd eu hangen?
- ❖ Faint o dir cyflogaeth ddylai fod ar gael?
- ❖ Ydych chi'n cytuno â'r lefel twf arfaethedig?

## Strategaeth Ofodol Arfaethedig

- Canolbwyntio datblygiad yn Ardal Strategol Bodelwyddan ac aneddiadau sydd â gwasanaethau.

Mae gwasanaethau yn cynnwys y siopau a chludiant cyhoeddus sydd ar gael.

- Twf mwy cyfyngedig mewn aneddiadau sydd heb wasanaethau. Bydd datblygu yn yr aneddiadau hyn yn canolbwyntio ar fodloni anghenion lleol.

- ❖ Ymhle ydych chi'n credu y dylai'r datblygu ddigwydd?
- ❖ Ydych chi'n cytuno â'r strategaeth ofodol arfaethedig?

## Beth ydi'r prif bolisiau?

Y prif bolisiau ydi egwyddorion cyffredinol a fydd yn helpu i gyflawni'r CDLI newydd. Maent yn cynnwys:- Gwneud Lleuedd, y Gymraeg, Tai, Tai Fforddiadwy, Tir Cyflogaeth, Canol Trefi a Datblygiadau Manwerthu, Safle Strategol Bodelwyddan, Economi Ymwelwyr, Cludiant a Hygyrchedd, Mwynau, Rheoli Gwastraff a'r Amgylchedd Naturiol ac Adeiledig.



# Cynllun Datblygu Lleol Sir Ddinbych (CDLI) 2018 - 2033

# Y Gofrestr Safleoedd Posibl

Dyma'r safleoedd y mae pobl yn credu fyddai'n addas i'w datblygu yn y 15 mlynedd nesaf. Mae manylion y safleoedd hyn wedi'u hanfon at y Cyngor er mwyn iddynt gael eu hystyried ar gyfer y CDLI. Ynghlwm â phob safle mae yna:-

- Cyfeirir – defnyddiwyd y rhif hwn i roi sylw am y safle ar y Ffurflen Ymateb i'r Ymgynghoriad.
- Defnydd arfaethedig a'l ddefnydd presennol.
- Map a manylion am faint y safle a'r anheddiad agosaf.
- Syniad a ydi'r safle'n cydymffurfio â'r Strategaeth a Ffeirir neu beidio (mae cyfyngiad ar hyn o ran ydi'r safle o fewn parth llifogydd C2 a/neu ydyw'n cydymffurfio â'r hierarchaeth anheddiad arfaethedig).

**ABERCHWILER / ABERWHEELER**

Cefnnod y Saff Site Reference	CS 072-009	Afnnebedd y Saff (Hectares) Site Area (Hectares)	12
Defnidd Defnyddio Proposed Use	Tai Housing	Ddefnidd presennol Current Use	Tir poriamaethyddol Agricultural pasture land
Anheddiad Agosaf Nearest Settlement	Aberchwiler Aberchwiler	Ydych chi ddymhgwio i'r Strategaeth a Hefi? Does the site comply with the Preferred Strategy?	Ydw Yes
Enw'r Saff Site Name	Tŷ yn Bionallt, Aberchwiler Land at Bionallt, Aberchwiler		



Gallwch wneud sylwadau ar unrhyw rai o ' r safleoedd hyn gan ddefnyddio ' r Ffurflen Ymateb i'r Ymgynghoriad.

# Cynllun Datblygu Lleol (CDLI) Sir Ddinbych Denbighshire Local Development Plan (LDP) 2018 - 2033

## Beth nesaf?

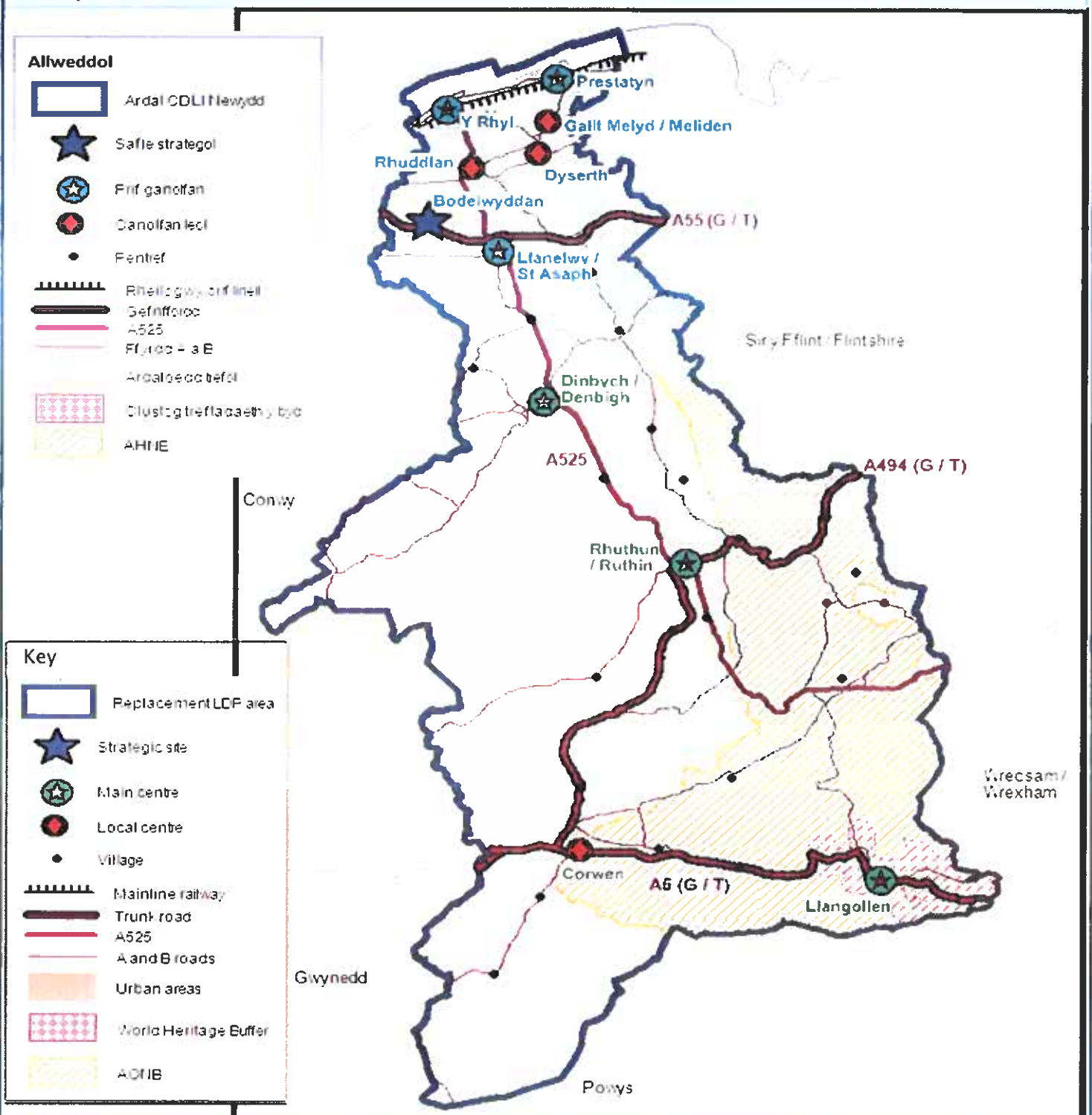
- Bydd yr holl ymatebion yn cael eu hystyried a byddant yn llywio datblygiad y 'CDLI i'w archwilio gan y cyhoedd', sef y cam nesaf i lunio cynllun ar gyfer Sir Ddinbych. Mae'r CDLI i'w archwilio gan y cyhoedd yn ddrafft llawn o'r Cynllun Datblygu Lleol a bydd yn cynnwys polisiau manwl a dyraniadau am safleoedd i'w datblygu.
- Bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd ac yn cael eu hadrodd wrth y Cabinet a'r Cyngor fel rhan o'r adroddiad am yr ymgynghoriad.
- Mae disgwyl i'r CDLI i'w archwilio gael ei gyhoeddi i'r cyhoedd ymgynghori arno yng ngwanwyn 2020.

## What next?

- All responses will be considered and will inform the development of the 'Deposit LDP', the next stage in producing a plan for Denbighshire. The Deposit LDP is a full draft of the Local Development Plan and will contain all detailed policies and site allocations for development.
- All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation.
- It is anticipated that the Deposit LDP will be published for public consultation in Spring 2020.

# Cynllun Datblygu Lleol Sir Ddinbych Denbighshire Local Development Plan 2018 - 2033

## Map Cymeriad Sir Ddinbych/ Denbighshire's Character Map





# Denbighshire Local Development Plan (LDP) 2018 - 2033



## What is a LDP?

A plan containing policies and land allocations to guide sustainable development in Denbighshire to 2033.

The current LDP will run out at the end of 2021 and we need a new LDP in its place.

## How can you help?

Let us have your comments (positive or negative) on:-

- the high level strategy contained within the Draft Preferred Strategy and
- the other consultation documents: Sustainability Appraisal, Habitats Regulations Appraisal and Candidate Sites Register.

Consultation is for 8 weeks and ends on 30.08.2019.

## How do I make my comments?

Use the consultation portal available at

<https://countyconversation.denbighshire.gov.uk/project/447> or

Complete a consultation response form available

a) Online at [www.denbighshire.gov.uk/ldp](http://www.denbighshire.gov.uk/ldp)

b) From libraries and one-stop shops.

Return it by either

emailing: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk); or

by posting it to: Strategic Planning and Housing,  
Denbighshire County Council  
PO Box 62, Ruthin, LL15 9AZ.

**Contact Us: 01824 706916**

# Denbighshire Local Development Plan (LDP) 2018 - 2033

This is the first stage in producing a new development plan for Denbighshire. This stage sets out the high level strategy. No sites are allocated during this stage.

## What is the high level strategy?

How much development (proposed growth level) there should be in the whole of the County until 2033 and where that development should go (spatial strategy).

## Proposed level of growth

Over the plan period, 15 years, to 2033:-

- Employment land – allocate 68 hectares of land for employment use.
- New homes – allocate land for developing 3,775 new homes.

Met through a variety of sources, including completions after April 2018.

### Have your say:

- ❖ How many homes do you think are needed?
- ❖ How much employment land should be available?
- ❖ Do you agree with the proposed level of growth?

## Proposed Spatial Strategy

- Focus development in Bodelwyddan Strategic Site and settlements with services.

Services include the availability of shops and public transport.

- More limited growth in settlements that do not have services. Development in these settlements will be focussed on meeting local needs.

- ❖ Where do you think development should go?
- ❖ Do you agree with the proposed spatial strategy?

## What are the key policies?

The key policies are general principles that will help deliver the new LDP. They include:- Placemaking, Welsh Language, Housing, Affordable Housing, Employment Land, Town Centres and Retail Development, Bodelwyddan Strategic Site, Infrastructure, Visitor Economy, Transport and Accessibility, Minerals, Waste Management and Natural and Built Environment.

# Denbighshire Local Development Plan (LDP) 2018 - 2033

## The Candidate Sites Register

There are sites which people think would be suitable for development in the next 15 years. Details of these sites have been sent to the Council so that they can be considered for the LDP. For each site there is:-

- A reference number – please use this to comment on the site on the Consultation Response Form.
- A proposed use and current use.
- A map and details of the site size and nearest settlement.
- A yes or no indication of whether the site complies with the Preferred Strategy (this is limited to whether the site is in a C2 flood zone and/or it is in compliance with the proposed settlement hierarchy).

ABERCHWILER / ABERWHEELER			
Cyfnewid y Safle Site Reference	CS44E008	Arwynebedd y Safle (Hectares) Site Area (Hectares)	1.2
Defnydd Arfaeliedig Proposed Use	Tai Housing	Defnydd presennol Current Use	Tir pori amaethyddol Agricultural pasture land
Anheddiad Agosaf Nearest Settlement	Aberchwiler Aberwheeler	Ydych chi'n cydymffurfio â'r Strategaeth a ffleis? Does the site comply with the Preferred Strategy?	Ydw - Yes
Enw'r Safle Site Name	Taf yn Bronallt, Aberchwiler Land at Bronallt, Aberwheeler		

The map shows the site boundary in red. It is located near the town of Aberchwiler. Key features on the map include the 'Sewage Works' to the west, 'Bronallt' to the north, and 'Reservoir' to the east. The site is labeled 'Aberwheeler' and 'Aberchwiler'.

You can comment on any of these sites using the Consultation Response Form.



# Cynllun Datblygu Lleol (CDLI) Sir Ddinbych Denbighshire Local Development Plan (LDP) 2018 - 2033

## Beth nesaf?

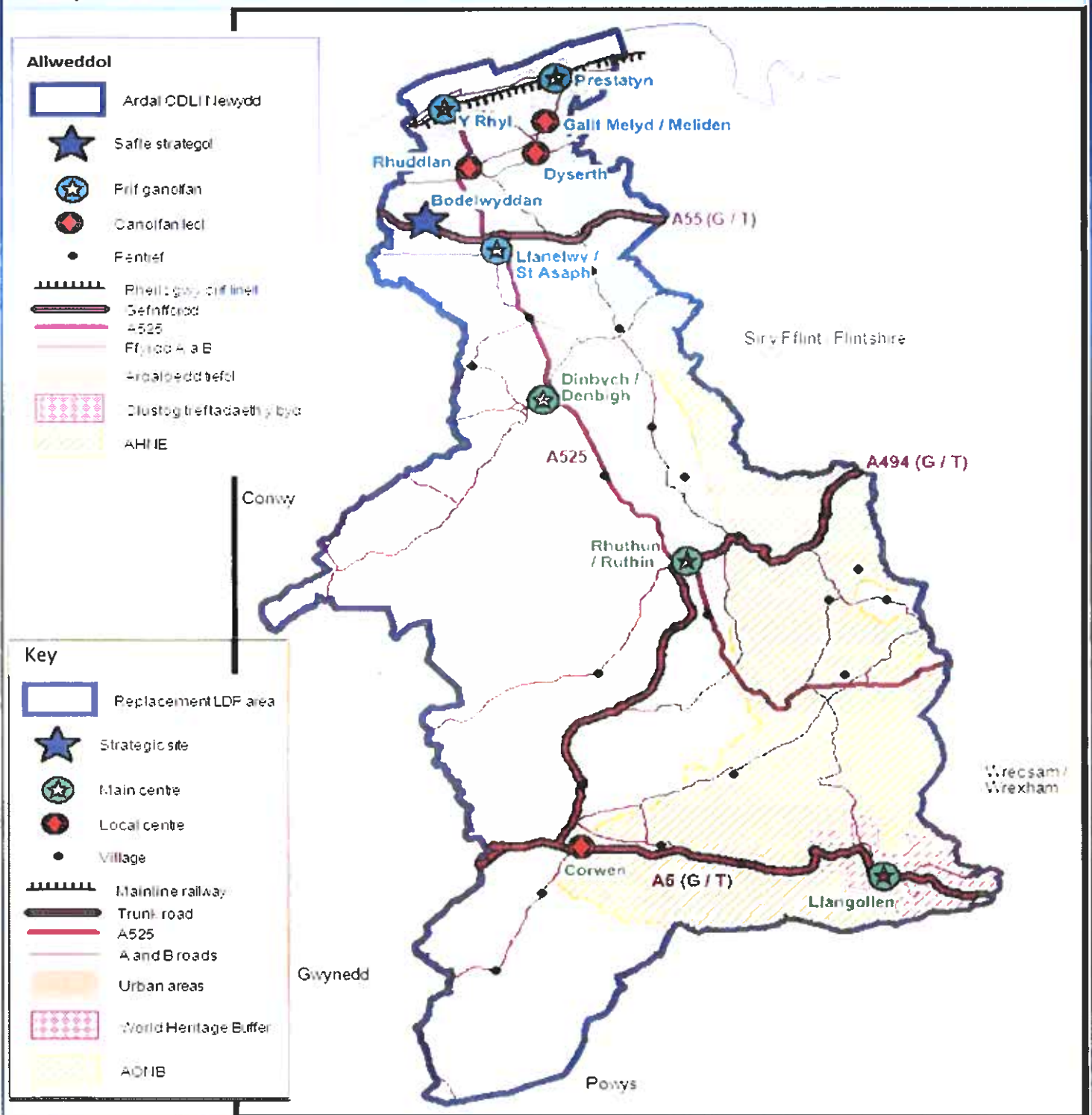
- Bydd yr holl ymatebion yn cael eu hystyried a byddant yn llywio datblygiad y 'CDLI i'w archwilio gan y cyhoedd', sef y cam nesaf i lunio cynllun ar gyfer Sir Ddinbych. Mae'r CDLI i'w archwilio gan y cyhoedd yn ddrafft llawn o'r Cynllun Datblygu Lleol a bydd yn cynnwys polisïau manwl a dyraniadau am safleoedd i'w datblygu.
- Bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd ac yn cael eu hadrodd wrth y Cabinet a'r Cyngor fel rhan o'r adroddiad am yr ymgynghoriad.
- Mae disgwyl i'r CDLI i'w archwilio gael ei gyhoeddi i'r cyhoedd ymgynghori arno yng ngwanwyn 2020.

## What next?

- All responses will be considered and will inform the development of the 'Deposit LDP', the next stage in producing a plan for Denbighshire. The Deposit LDP is a full draft of the Local Development Plan and will contain all detailed policies and site allocations for development.
- All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation.
- It is anticipated that the Deposit LDP will be published for public consultation in Spring 2020.

# Cynllun Datblygu Lleol Sir Ddinbych Denbighshire Local Development Plan 2018 - 2033

## Map Cymeriad Sir Ddinbych/ Denbighshire's Character Map





Sir Ddinbych CDLI 2018 – 2033  
 Strategaeth a Ffeirir Ddrafft:  
**Manylion Cyswllt**

Denbighshire LDP 2018 – 2033  
 Draft Preferred Strategy:  
**Contact Details**

	Manylion personol / Personal Details	Manylion yr Asiant (os yw'n berthnasol) / Agent Details (If Applicable)
Enw / Name:		
Sefydliad (os yw'n berthnasol) / Organisation (If Applicable):		
Cyfeiriad / Address:		
Cod post / Postcode:		
Rhif Ffôn / Telephone No:		
E-bost / Email:		

Ydych chi'n dymuno parhau i gael eich hysbysu o'r camau yn y dyfodol o baratodau'r Cynllun? / Do you wish to be kept informed regarding future stages of the Plan's preparation?		
Dull cyswllt dewisol / Preferred means of contact		
Ydych chi'n dymuno cyfathrebu yn y Gymraeg neu'r Saesneg? / Do you wish to correspond in English or Welsh?		

## APPENDIX 8

Annwyl Syr / Fadam

### **Cynllun Datblygu Lleol Sir Ddinbych 2018-2033 – Ymgynghoriad ar y Safleoedd Ymgeisiol Ychwanegol**

Fe wyddoch fod y gwaith wedi dechrau o baratoi Cynllun Datblygu Lleol newydd Sir Ddinbych ar gyfer 2018-2033. Y cam ymgynghori mawr cyntaf oedd y Strategaeth a Ffefrir Ddrafft neu'r cam Cyn Adneuo, a ddigwyddodd rhwng 08.07.19 a 31.08.19.

Cyflwynwyd safleoedd ymgeisiol ychwanegol i'r Cyngor yn ystod cyfnod ymgynghori drafft y strategaeth a ffefrir.

Mae'n bwysig nodi nad oes unrhyw benderfyniad wedi'i wneud ar unrhyw un o'r safleoedd ymgeisiol ac NAD YDYNT yn geisiadau cynllunio. Y cyfan yw'r safleoedd ymgeisiol yw adlewyrchiad o'r hyn sydd wedi'i gyflwyno i Gyngor Sir Ddinbych i'w cynnwys fel dyraniadau yng Nghynllun Datblygu Lleol newydd Sir Ddinbych ar gyfer 2018 i 2033.

Rydym bellach yn ymgynghori ar y safleoedd ymgeisiol ychwanegol hyn y gellir eu gweld yma

Dear Sir / Madam

### **Denbighshire Local Development Plan (LDP) 2018 – 2033 - Consultation on the Additional Candidate Sites**

As you will be aware work has started on the new LDP for Denbighshire to cover the period 2018 – 2033. The first major consultation stage was the draft Preferred Strategy or Pre-Deposit which took place between 08.07.19 and 31.08.19.

Additional candidate sites were submitted to the Council during the draft Preferred Strategy consultation period.

It is important to note that no decision has been made on any of the candidate sites and they are NOT planning applications. The candidate sites are simply a reflection of what has been submitted to Denbighshire County Council for consideration to potentially be included as allocations in Denbighshire's replacement Local Development Plan 2018 to 2033.

We are now consulting on these additional candidate sites which can be found here

[www.denbighshire.gov.uk/LDP](http://www.denbighshire.gov.uk/LDP)

[www.sirddinbych.gov.uk/CDLI](http://www.sirddinbych.gov.uk/CDLI)

Bydd yr ymgynghoriad hwn yn para am 8 wythnos tan 13.03.20.

Os oes gennych chi unrhyw gwestiwn mae croeso i chi gysylltu ag unrhyw aelod o'r tîm CDLI ar 01824 706916 neu [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

This consultation will run for 8 weeks until 13.03.20.

If you have any questions, please do not hesitate to contact the LDP team on 01824 706916 or via [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

Yn gywir / Yours faithfully,



**Angela Loftus**

Rheolwr Cynllunio Strategol a Thai / Strategic Planning and Housing Manager



## Cynllun Datblygu Lleol 2018 - 2033

### Safleoedd Ymgeisiol Ychwanegol: **Safleoedd Ymgeisiol Ychwanegol**

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Mae'r Cyngor wedi derbyn rhai safleoedd ymgeiswyr ychwanegol mewn ymateb i'r ymgynghoriad ar y Strategaeth Ddrafft a Ffeirir ar gyfer y Cynllun Datblygu Lleol nesaf 2018 – 2033 (CDLI). Mae'r cynigwyr am i'r Cyngor ystyried dyraniadau tir ychwanegol ar gyfer y CDLI nesaf.

Nodwch nad ymgynghoriad ar gyfer ceisiadau cynllunio yw hwn; Mae safleoedd wedi cael eu cyflwyno i Gyngor Sir Ddinbych i'w hystyried fel dyraniadau posibl ar gyfer datblygu.

Ar y cam presennol o gynhyrchu'r CLDI nesaf 2018 I 2033, nig dyma'r safleoedd a f ffeirir gan y Cyngor i'w datblygu.

Mae Cyngor Sir Ddinbych yn croesawu sylwadau sy'n ymwneud yn uniongyrchol ag ystyriaethau cynllunio ar y Safleoedd Ymgeisiol Ychwanegol. Nid yw hyn yn gyfleu gyflwyno sylwadau ar y Strategaeth Ddrafft a Ffeirir neu wahoddiad I gyflwyno rhagor o safleoedd I ymgeiswyr.

Y dyddiad cau ar gyfer cyflwyno sylwadau ar Safleoedd Ymgeisiol Ychwanegol yw 13 Mawrth 2020.

Ar ôl ei gwblhau, dychwelwch eich ffurflen sylwadau at: Y Tîm Cynllunio Strategol a Thai, Cyngor Sir Ddinbych, Blwch Post 62, Rhuthun, LL15 9AZ

E-bost: [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

Gwefan: [www.sirddinbych.gov.uk/cdli](http://www.sirddinbych.gov.uk/cdli)

Cysylltwch â'r Tîm Cynllunio Strategol a Thai os ydych angen rhagor o wybodaeth a chynghor, drwy anfon e-bost at [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk) neu cysylltwch â ni dros y ffôn: 01824 706916.

**Bydd yr holl sylwadau a dderbynnir ar gael i'r cyhoedd ac yn cael eu hadrodd wrth y Cabinet a'r Cyngor fel rhan o'r adroddiad am yr ymgynghoriad.**

**Ni fydd eich manylion cyswllt yn cael eu cyhoeddi i unrhyw drydydd parti a bydd ond yn cael eu defnyddio ar gyfer y pwrpas y broses Cynllun Datblygu Lleol Sir Ddinbych. Sylwch y bydd eich enw, sylwadau, a'ch tref/dinas ar gael yn gyhoeddus. Er mwyn cydymffurfio â deddfwriaeth diogelu data, ni fydd manylion cyfeiriad a chyfeiriadau e-bost yn cael eu cyhoeddi.**

## Cynllun Datblygu Lleol 2018 - 2033

### Safleoedd Ymgeisiol Ychwanegol: **Manylion Cyswllt**

	<b>Manylion personol</b>	<b>Manylion yr Asiant (os yw'n berthanasol)</b>
Enw:	Cliciwch yma i roi testun.	Cliciwch yma i roi testun.
Sefydliad (os yw'n berhnasol):	Cliciwch yma i roi testun.	Click here to enter text.
Cyfeiriad:	Cliciwch yma i roi testun.	Cliciwch yma i roi testun.
Cod post:	Cliciwch yma i roi testun.	Cliciwch yma i roi testun.
Rhif Ffôn:	Cliciwch yma i roi testun.	Cliciwch yma i roi testun.
E-bost:	Cliciwch yma i roi testun.	Cliciwch yma i roi testun.

Ydych chi'n dymuno parhau i gael eich hysbysu o'r camau yn y dyfodol o baratodau'r Cynllun?	Cliciwch yma i roi testun.
Dull cyswllt dewisol	Cliciwch yma i roi testun.
Ydych chi'n dymuno cyfathrebu yn y Gymraeg neu'r Saesneg?	Cliciwch yma i roi testun.

## Cynllun Datblygu Lleol 2018 - 2033

### Safleoedd Ymgeisiol Ychwanegol: **Safleoedd Ymgeisiol Ychwanegol**

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Os ydych yn dymuno rhoi sylw ar unrhyw un o'r Safleoedd Ymgeisiol Ychwanegol, gwnewch hynny isod.

**Rhaid i'r holl sylwadau gynnwys rhif cyfeirnod y safle(oedd) penodol y maent yn cyfeirio ato / atynt.**

Rhif cyfeirnod y safle:	Cliciwch yma i roi testun.
Cliciwch yma i roi testun.	

## Cynllun Datblygu Lleol 2018 - 2033

Rhif cyfeirnod y safle:	Cliciwch yma i roi testun.
Cliciwch yma i roi testun.	

## Cynllun Datblygu Lleol 2018 - 2033

### **Safleoedd Ymgeisiol Ychwanegol**

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Dioch an eich sylwadau ar y Safleoedd Ymgeisiol Ychwanegol.

Os oes gennych unrhyw gwestiynau pellach neu os hoffech ragor o gymorth, mae croeso i chi gysylltu â'r Adran Cynllunio Strategol a Thai ar: 01824 706916 neu anfonwch e-bost i [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

Dylid dychwelyd ffurflenni wedi'u llenwi at:

Y Tîm Cynllunio Strategol a Thai

Cyngor Sir Ddinbych

Blwch Post 62

Rhuthun

LL15 9AZ

Neu anfon drwy e-bost at: [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

Mae'n rhaid i sylwadau ddod i law erbyn 5 p.m. ar 13 Mawrth 2020.

**Efallai na fydd unrhyw sylwadau a wneir ar ôl hyn yn cael eu hystyried.**



## Local Development Plan 2018 to 2033 Additional Candidate Sites: **Consultation Form**

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The Council received some additional candidate sites in response to the consultation on the draft Preferred Strategy for the next Local Development Plan 2018 to 2033 (LDP). Proposers want the Council to consider these sites for potential allocations in the next LDP.

**Please note that this is not a consultation for planning applications;** sites have been submitted to Denbighshire County Council for consideration as potential allocations for development in the Replacement LDP 2018 to 2033.

**Please note that they are NOT the Council's preferred sites for development at the present stage in producing the next LDP 2018 to 2033.**

Denbighshire County Council welcomes comments directly relating to planning considerations on the additional candidate sites. This is not an opportunity to submit comments on the draft Preferred Strategy or an invitation to submit further candidate sites.

The closing date for submission of comments on the additional candidate sites is **13 March 2020**.

Once completed, please return your comments form to:

Strategic Planning & Housing Team, 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)

Please contact the Strategic Planning & 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 : 01824 706916.

**All comments received will be published in the consultation report and made publicly available.**

**Your contact details will not be released to any third parties and will only be used for the purposes of Denbighshire's Local Development Plan process. Please note that your name and your comments will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.**

## Local Development Plan 2018 to 2033

### Additional Candidate Sites: **Contact Details**

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	Personal Details	Agent Details (If Applicable)
Name:	Click here to enter text	Click here to enter text.
Organisation (If Applicable):	Click here to enter text.	Click here to enter text.
Address:	Click here to enter text.	Click here to enter text.
Postcode:	Click here to enter text.	Click here to enter text.
Telephone No:	Click here to enter text.	Click here to enter text.
Email:	Click here to enter text.	Click here to enter text.

Do you wish to be kept informed regarding future stages of the Plan's preparation?	Click here to enter text.
Preferred means of contact	Click here to enter text.
Do you wish to correspond in English or Welsh?	Click here to enter text.

## Local Development Plan 2018 to 2033

### Additional Candidate Sites: **Additional Candidate Sites**

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If you wish to comment on any of the Additional Candidate Sites please do so below.

**All comments must include the reference number of the particular site(s) they refer to.**

Site Reference Number:	Click here to enter text.
Click here to enter text.	

## Local Development Plan 2018 to 2033

Site Reference Number:	<a href="#">Click here to enter text.</a>
<a href="#">Click here to enter text.</a>	

## Local Development Plan 2018 to 2033 **Additional Candidate Sites**

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Thank you for your comments on the Additional Candidate Sites.

If you have any further questions or require any assistance, please do not hesitate to contact the Strategic Planning & Housing Department on: 01824 706916 or email: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

Completed forms should be submitted by:

Email to: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

Or Posted to:

Strategic Planning & Housing Team

Denbighshire County Council

PO Box 62

Ruthin

LL15 9AZ

**Comments must be received by 5 p.m. on 13 March 2020.**

**Comments made after this time may not be considered.**

## **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

Mae'r Cyngor wedi derbyn safleoedd ymgeisiol ychwanegol mewn ymateb i'r ymgynghoriad ar y Strategaeth a Ffafrir ar gyfer y Cynllun Datblygu Lleol nesaf 2018 tan 2033 (CDLI). Mae'r cynigwyr yn awyddus i'r Cyngor ystyried dyraniadau tir ychwanegol ar gyfer y CDLI nesaf.

Rydym wedi ateb ychydig o gwestiynau cyffredin isod.

### **Safleoedd Ymgeisiol**

#### **Beth yw Safle Ymgeisiol?**

Safle neu ddarn penodol o dir sydd wedi'i gyflwyno i Gyngor Sir Ddinbych i'w hystyried ar gyfer dyraniad posibl at ddatblygiad yn y Cynllun Datblygu Lleol. Hoffai'r cynigydd weld y tir yn cael ei ddatblygu yn ystod rhyw gyfnod yn ystod cyfnod y cynllun. Mae'r cynigydd wedi cyflwyno'r tir i'w ystyried a'i asesu fel ei fod yn briodol i gael ei ddatblygu ar gyfer defnydd awgrymedig mewn egwyddor, yn amodol ar y manylion.

Nid yw'n gais cynllunio. Mae cais cynllunio yn parhau i fod yn ofynnol er mwyn asesu manylion y cynnig cynllunio, hyd yn oed os yw'r cynigydd yn llwyddiannus wrth gael tir wedi'i ddyrannu mewn Cynllun Datblygu Lleol.

#### **Beth yw'r Safleoedd Ymgeisiol Ychwanegol?**

Yn ystod yr ymgynghoriad ar y Strategaeth Drafft a Ffafrir, gallai tirlfeddianwyr ac unigolion neu sefydliadau sydd â buddiant mewn tir ofyn iddo gael ei ystyried ar gyfer ei ddyrannu yn y Cynllun Datblygu Lleol. Mae'r safleoedd ymgeisiol ychwanegol hynny yn rhannau o dir a gyflwynwyd i'r Cyngor yn ystod yr ymgynghoriad hwnnw.

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

## **Pwy all gyflwyno Safle Ymgeisiol?**

Gall unrhyw un gyflwyno darn o dir i'w ystyried i'w gynnwys yng Nghynllun Datblygu Lleol Sir Ddinbych 2018 tan 2033.

## **Beth yw'r defnyddiau y gall y Safle Ymgeisiol ei ddyrannu ar eu cyfer?**

Gellir cynnig safle ar gyfer unrhyw fath o ddatblygiad. Mae'r mwyafrif o'r tir wedi'u cynnig ar gyfer datblygiad preswyl. Hefyd mae cynigion ar gyfer tir cyflogaeth, ynni adnewyddadwy a chymysgedd o ddefnydd cydweddol ar un safle.

Mae'n rhaid dyrannu Cynllun Datblygu Lleol ar gyfer amrywiaeth o ddefnyddiau gan gynnwys pwrpas cyflogaeth a phreswyl.

## **A oes gwahaniaeth rhwng y categori tai a phreswyl?**

Nac oes. Mae'r disgrifiad o'r denfydd arfaethedig ar gynllun y safle ymgeisiol yn cael ei ysgrifennu yng ngeiriau'r cynigydd. Nid oes gwahaniaeth rhwng y categori tai a phreswyl.

## **Beth a olygir gan 'A yw'r safle yn cydymffurfio â'r strategaeth a ffafir?'**

Mae'r holl geisiadau wedi bod yn destun asesiad sgrinio cychwynnol er mwyn canfod y safleoedd hynny sy'n cydymffurfio'n eang â'r hierarchaeth aneddiadau arfaethedig, fel rhan o'r Strategaeth Ddrafft a Ffafir, a heb eu lleoli'n gyfan gwbl o fewn Nodyn Cyngor Technegol 15 Llywodraeth Cymru: Datblygu a Pherygl o Lifogydd', h.y. ardaloedd perygl llifogydd C2.

Lle mae'r mwyafrif o'r safle ymgeisiol wedi'i leoli ym mharth llifogydd C2 a'r cynnig yn cynnwys defnydd preswyl, ni fydd yn cydymffurfio â'r strategaeth a ffafir.

Os yw'r safle wedi'i leoli yn y cefn gwlad agored, ni fydd yn cydymffurfio â'r strategaeth a ffafir.

Nid yw cydymffurfio â'r Strategaeth Ddrafft a Ffafir yn sicrhau y bydd safle ymgeisiol yn symud ymlaen ac yn cael ei gynnwys yn y CDLI nesaf.

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

## **A yw'r holl safleoedd ymgeisiol yn sicr o gael eu datblygu?**

Nac ydy. Bydd safle ond yn cael ei ddatblygu os caniateir caniatâd cynllunio ac os yw'r datblygwr yn awyddus i weithredu'r penderfyniad.

Bydd safleoedd ond yn cael eu dyrannu yn y Cynllun Datblygu Lleol os ydynt yn cyfrannu at y twf datblygiad gofynnol fel y cynigir yn y Strategaeth a Ffafir. Ar hyn o bryd, mae maint y tir a gyflwynwyd o ran datblygiad preswyl yn sylweddol fwy na'r strategaeth cynnydd tai arfaethedig a nodir yn y Strategaeth drafft a ffafir. Mae mwy o safleoedd ymgeisiol nag sydd ei angen i ddarparu'r strategaeth cynnydd tai.

## **Pam nad oes unrhyw un wedi ysgrifennu ataf i drafod y safle sydd wedi'i gyflwyno?**

Derbyniodd y Cyngor dros 200 o safleoedd yn y cam galw am safleoedd, sy'n rhan o'r broses o ddatblygu'r Cynllun Datblygu Lleol. Derbyniwyd 36 safle pellach yn ystod cam ymgynghori'r Strategaeth drafft a Ffafir. Ni fydd bob un o'r safleoedd ymgeisiol yn cael eu cymryd ymlaen fel dyraniad yn y Cynllun Datblygu Lleol. Mae cyflwyno safle ymgeisiol yn gyfle i bartïon â diddordeb fynegi dymuniad i ddatblygu safle ar rhyw bwynt yn y dyfodol. Nid yw cyflwyno safle ymgeisiol yr un fath â chais am ganiatâd cynllunio. Nid oes gofyniad statudol i roi gwybod i gymdogion am safle ymgeisiol ac nid yw'n bosibl nac yn ymarferol i roi gwybod i bob eiddo cyfagos am safle ymgeisiol.

Mae'r Cyngor yn darparu'r Cynllun Datblygu Lleol nesaf 2018 tan 2033 yn unol â'r Cynllun Cynnwys Cymunedau sy'n amlinellu'r gofynion ymgynghori. Gellir dod o hyd i fanylion y Cynllun Cynnwys Cymunedau yn Adran 3 o Gytundeb Darparu Cynllun Datblygu Lleol Newydd Sir Ddinbych.



# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

## **A oes modd cyflwyno ceisiadau cynllunio yn ogystal â safleoedd ymgeisiol?**

Oes. Mae'n rhaid penderfynu ar gais cynllunio cyn gweithredu datblygiad newydd. Mae'n rhaid i gais cynllunio gydymffurfio â pholisi cenedlaethol a lleol er mwyn ei gymeradwyo.

## **Cyflwyno Sylwadau am Safleoedd Ymgeisiol Ychwanegol**

### **Sut alla i gyflwyno sylwadau am safleoedd ymgeisiol ychwanegol?**

Gallwch ymateb i'r safleoedd ymgeisiol ychwanegol drwy ddefnyddio'r Ffurflen Ymgynghori Safleoedd Ymgeisiol Ychwanegol, drwy ddefnyddio'r Porthol Ymgynghori ar-lein neu drwy ysgrifennu atom. Os ydych yn ysgrifennu atom, sicrhewch eich bod yn nodi eich enw, cyfeiriad a chyfeirnod y safle y mae eich sylwadau'n ymwneud ag ef. Ni fyddwn yn derbyn ymatebion dienw neu ymatebion heb gyfeirnod safle.

## **A oes dyddiad cau ar gyfer yr ymgynghoriad ar safleoedd ymgeisiol ychwanegol?**

Oes. **5.p.m, 13 Mawrth 2020** yw'r dyddiad cau ar gyfer cyflwyno sylwadau ar y safleoedd ymgeisiol ychwanegol.

## **At bwy ddylwn i anfon fy ymateb?**

Mae'n rhaid i chi anfon eich ymateb drwy'r post neu dros e-bost at:

Y Tîm Cynllunio Strategol a Thai

Cyngor Sir Ddinbych

Blwch Post 62

Rhuthun

LL15 9AZ

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

E-bost: [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk)

## **Sut fyddwch chi'n defnyddio fy sylwadau?**

Bydd yr holl sylwadau a dderbynnir yn cael eu cynnwys yn adroddiad yr ymgynghoriad a byddant ar gael i'r cyhoedd.

Bydd eich sylwadau'n cael eu hystyried fel rhan o'r asesiad o Safleoedd Ymgeisiol.

## **Sut ydych chi'n amddiffyn fy nata personol?**

Ni fydd eich manylion cyswllt yn cael eu cyhoeddi i unrhyw drydydd partïon a bydd ond yn cael eu defnyddio ar gyfer y pwrpas y broses Cynllun Datblygu Lleol Sir Ddinbych. Sylwch y bydd eich enw, sylwadau, a'ch tref/dinas ar gael yn gyhoeddus. Er mwyn cydymffurfio â deddfwriaeth diogelu data, ni fydd manylion eich cyfeiriad a chyfeiriadau e-bost yn cael eu cyhoeddi.

## **Ai dyma fy unig gyfle i gymryd rhan?**

Na. Ymgynghoriad ychwanegol ar safleoedd a dderbyniwyd yn ystod yr ymgynghoriad ar y Strategaeth Drafft a Ffafrir yw hwn. Nid yw'n rhan o'r broses sy'n ofynnol gan y gyfraith i Gyngor Sir Ddinbych ei chwblhau er mwyn datblygu Cynllun Datblygu Lleol.

Cynhelir ymgynghoriad unwaith y bydd y strategaeth wedi'i datblygu ymhellach ac unwaith y bydd y meysydd datblygu a ffafrir wedi'u dewis. Caiff hyn ei gwblhau yn ystod cam y Cynllun i'w Archwilio gan y Cyhoedd, dyma'r ail gam yn y broses o baratoi Cynllun Datblygu Lleol, ac mae'r cam yn ofynnol gan y gyfraith.

Y trydydd cam o'r Cynllun Datblygu Lleol yw gwrandawriad archwilio cyhoeddus, sydd hefyd yn ofynnol gan y gyfraith. Gellir hefyd cyflwyno sylwadau yn y gwrandawriad archwilio.

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

## **Y wybodaeth ddiweddaraf am y Cynllun Datblygu Lleol 2018 tan 2033**

### **Sut alla i gymryd rhan?**

Gallwch ddarparu ymateb i'r safleoedd ymgeisiol ychwanegol drwy ddefnyddio'r Ffurflen Ymgynghori Safleoedd Ymgeisiol Ychwanegol, drwy ddefnyddio'r Porthol Ymgynghori ar-lein neu drwy ysgrifennu atom. Os ydych yn ysgrifennu atom, sicrhewch eich bod yn nodi eich enw, cyfeiriad a chyfeirnod y safle y mae eich sylwadau'n ymwneud ag ef. Ni fyddwn yn derbyn ymatebion dienw neu ymatebion heb gyfeirnod safle.

Gallwn eich ychwanegu i'n cronfa dda er mwyn i chi gael gwybod y wybodaeth ddiweddaraf ynghylch datblygiadau'r Cynllun Datblygu Lleol 2018 tan 2033. Os hoffech gael eich ychwanegu i'n cronfa ddata, ysgrifennwch atom gan nodi eich manylion cyswllt, enw a chyfeiriad, a chyfeiriad e-bost os yw'n berthnasol.

### **Nid oes arnaf eisiau cyflwyno sylwadau am y safleoedd ymgeisiol, ond rwy'n awyddus i gael gwybod y wybodaeth ddiweddaraf mewn perthynas â'r Cynllun Datblygu Lleol 2018 tan 2033**

Gallwn eich ychwanegu i'n cronfa ddata er mwyn i chi gael gwybod y wybodaeth ddiweddaraf ynghylch y Cynllun Datblygu Lleol 2018 tan 2033.

Os hoffech chi gael eich ychwanegu i'n cronfa ddata, bydd yn rhaid i chi roi gwybod i ni mewn ysgrifen a darparu eich manylion cyswllt, enw a chyfeiriad, a chyfeiriad e-bost os yw'n berthnasol.

### **Ble alla i ddod o hyd i ragor o wybodaeth?**

Mae gwybodaeth am bolisi cynllunio a gwybodaeth ynghylch y Cynllun Datblygu Lleol ar gael ar [www.sirddinbych.gov.uk/cdli](http://www.sirddinbych.gov.uk/cdli)

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

I ddarganfod mwy am y Cynllun Datblygu Lleol 2018 tan 2033, cliciwch y blwch o'r enw Cynllun Datblygu Lleol Newydd. Y cyfeiriad gwefan uniongyrchol yw

<https://www.denbighshire.gov.uk/cy/preswylwr/rheoliadau-cynllunio-ac-adeiladu/cynllun-datblygu-lleol/cynllun-datblygu-lleol-newydd/cynllun-datblygu-lleol-newydd-2018-2033.aspx>

## **Beth fydd yn digwydd nesaf?**

Bydd yr holl ymatebion yn cael eu hystyried a byddant yn dylanwadu ar ddatblygiad y 'CDLI i'w archwilio gan y cyhoedd' a'r asesiad o safleoedd ymgeisiol. Mae'r CDLI i'w archwilio gan y cyhoedd yn ddrafft llawn o'r Cynllun Datblygu Lleol a bydd yn cynnwys yr holl bolisiâu lleol a dyraniadau am safleoedd.

## **Sut fydd yn cael ei gyhoeddi?**

Caiff ei gyhoeddi yn y wasg leol, ar lwyfannau cyfryngau cymdeithasol megis Facebook a Twitter, ar wefan Cyngor Sir Ddinbych, drwy ymgysylltu gydag aelodau cynghorau dinas, tref a chymuned, yn ogystal â thrwy ysgrifennu at fudd-ddeiliaid a phartïon â diddordeb. Unigolion neu sefydliadau sydd wedi gofyn i gael eu cynnwys ar gronfa ddata / rhestr bostio'r Cynllun Datblygu Lleol yw partïon â diddordeb.

## **Cysylltu â'r Tîm Cynllunio Strategol a Thai**

### **Beth yw'r cyfeiriad e-bost?**

Anfonwch e-bost atom ni, y Tîm Cynllunio Strategol a Thai ar [polisicynllunio@sirddinbych.gov.uk](mailto:polisicynllunio@sirddinbych.gov.uk).

### **Beth yw'r cyfeiriad post?**

Y Tîm Cynllunio Strategol a Thai

Cyngor Sir Ddinbych

Blwch Post 62

# **Cwestiynau Cyffredin: Cynllun Datblygu Lleol 2018 tan 2033: Ymgynghoriad Safleoedd Ymgeisiol Ychwanegol**

Rhuthun

LL15 9AZ

**Beth yw'r rhif ffôn?**

01824 706916

## **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

The Council has received some additional candidate sites in response to the consultation on the draft Preferred Strategy for the next Local Development Plan 2018 to 2033 (LDP). Proposers want the Council to consider additional land allocations for the next LDP.

We have answered some frequently asked questions below.

### **Candidate Sites**

#### **What is a Candidate Site?**

A site or parcel of land that has been submitted to Denbighshire County Council for consideration as a potential allocation for development in the Local Development Plan (LDP). The proposer would like the land to be developed at some time during the plan period. The proposer has put forward the land for it to be considered and assessed as to whether it is appropriate to be developed for the suggested use in principle, subject to detail.

It is not a planning application. A planning application will still be required to assess the details of the planning proposal even if the proposer is successful in having the piece of land allocated in a Local Development Plan.

#### **What are the Additional Candidate Sites?**

During the consultation on the Draft Preferred Strategy, landowners and individuals or organisations with an interest in land could ask for it to be considered for allocation in the Local Development Plan. The additional candidate sites are pieces of land that were submitted to the Council during that consultation.

# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **Who can put forward a Candidate Site?**

Anyone can put forward a piece of land to be considered for inclusion in the next Denbighshire Local Development Plan 2018 to 2033.

## **What uses can a Candidate Site be allocated for?**

A site can be proposed for any type of development. The majority of the land that has been put forward is for residential development. There are also proposals for employment land, renewable energy and a mix of compatible uses on a single site.

Local Development Plans must allocate land to be used for a variety of uses including for employment and residential purposes.

## **Is there a difference between the category housing and residential?**

No. The description of the proposed use on the plan of the candidate site is written in the words used by the proposer. There is no difference between housing and residential.

## **What does it mean by 'Does the site comply with the preferred strategy'?**

All submissions have been subject to an initial screening to identify those sites which are broadly compliant with the proposed settlement hierarchy, as part of the draft Preferred Strategy, and are not entirely located within Welsh Government Technical Advice Note 15: 'Development and Flood Risk', i.e. flood risk zone C2.

Where the majority of the candidate site is located in a C2 flood zone and it is proposed for residential use it will not be compliant with the preferred strategy.

If a site is located in the open countryside it will not be compliant with the preferred strategy.

The mere compliance with the draft Preferred Strategy is not a guarantee that a candidate site will be taken forward and included in the next LDP.

# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **Are all the candidate sites definitely going to be developed?**

No. A site will only be developed if a planning permission is granted and the developer wants to implement the decision.

Sites will only be allocated in the Local Development Plan that can contribute to the required development growth as proposed in the Preferred Strategy. Currently the amount of land submitted in respect of residential development significantly outweighs the proposed housing growth strategy set out in the draft Preferred Strategy. There are more candidate sites than are needed to deliver the housing growth strategy.

## **Why haven't I been written to about the site being submitted?**

Over 200 sites were received by the Council in the call for sites stage of developing the Local Development Plan. A further 36 sites were received during the consultation stage of draft Preferred Strategy. Not all of the candidate sites will be taken forward for allocation in the Local Development Plan. A candidate site is only an expression of a wish from an interested party that they would like to develop a site at some point in the future. The submission of a candidate site is not the same as an application for planning permission. There is no statutory requirement to notify neighbours of a candidate site and it is not possible or practicable to notify every neighbouring property of a candidate site.

The Council delivers the next Local Development Plan 2018 to 2033 in line with the Community Involvement Scheme which sets out the consultation requirements. Details of the Community Involvement Scheme can be found in Section 3 of Denbighshire Replacement Local Development Plan's Delivery Agreement.

## **Can planning applications be submitted as well as candidate sites?**

Yes. A planning application always has to be determined before new development can occur. A planning application must comply with national and local policy for it to be approved.



# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **Making Comments on the Additional Candidate Sites**

### **How do I comment on the additional candidate sites?**

You can provide a response to the additional candidate sites by using the Additional Candidate Sites Consultation Form, by using the online Consultation Portal or by writing to us.

If you write to us please ensure you provide your name, address and the reference of the site to which your comments relate. We will not accept anonymous responses or responses without a site reference.

### **Is there a deadline for the additional candidate sites consultation?**

Yes. The deadline for making comments on the additional candidate sites is **5 p.m. on 13 March 2020**.

### **Where do I send my response?**

You must post or email your response to:

Strategic Planning & Housing Team

Denbighshire County Council

PO Box 62

Ruthin

LL15 9AZ

Email: [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **How will you use my comments?**

All comments received will be published in the consultation report and made publicly available.

Your comments will be taken into account as part of the assessment of the Candidate Sites.

## **How do you protect my personal data?**

Your contact details will not be released to any third parties and will only be used for the purposes of Denbighshire's Local Development Plan process. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.

## **Is this my only opportunity to get involved?**

No. This is an additional consultation on sites which were received during the consultation on the Draft Preferred Strategy. This is not part of the process which Denbighshire County Council must legally undertake to develop a Local Development Plan.

There will be consultation once the strategy has been developed further and preferred areas for development have been chosen. This will be at the Deposit Plan stage, the second, legally required, stage in preparing a Local Development Plan.

The third, legally required, stage of the Local Development Plan is a public examination hearing. Comments can also be made at the examination hearing.

# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **Keeping up to date with the Local Development Plan 2018 – 2033**

### **How do I get involved?**

You can provide a response to the additional candidate sites by using the Additional Candidate Sites Consultation Form, by using the online Consultation Portal or by writing to us. If you write to us please ensure you provide your name, address and the reference of the site to which your comments relate. We will not accept anonymous responses or responses without a site reference.

You can also be added to our database so that we will keep you informed of developments on the Local Development Plan 2018 – 2033. If you want to be added to our database you need to tell us in writing and provide us with your contact details, name and address and if applicable email address.

### **I don't want to comment on the additional sites but how can I be kept informed about the Local Development Plan 2018 – 2033?**

You can be added to our database so that we will keep you informed of developments on the Local Development Plan 2018 – 2033.

If you want to be added to our database you need to tell us in writing and provide us with your contact details, name and address and if applicable email address.

### **Where can I find more information?**

Planning policy information, information in relation to the Local Development Plan is available at [www.denbighshire.gov.uk/ldp](http://www.denbighshire.gov.uk/ldp).

To find out about the Local Development Plan 2018 – 2033 please click on the box titled Replacement Local Development Plan. The direct website address is <https://www.denbighshire.gov.uk/en/resident/planning-and-building-regulations/local-development-plan/replacement-ldp/replacement-local-development-plan-2018-2033.aspx>

# **Frequently Asked Questions: Local Development Plan 2018 to 2033: Additional Candidate Sites Consultation**

## **What happens next?**

All responses will be considered and will inform the development of the 'Deposit LDP' and the assessment of the candidate sites. The Deposit LDP is a full draft of the Local Development Plan and will contain all local policies and preferred site allocations.

## **How is it being publicised?**

Publication is in the local press, on social media platforms Facebook and Twitter, on Denbighshire County Council's website, by engagement with members and city, town and community councils, as well as by writing to all interested parties and stakeholders. Interested parties are individuals or organisations who have asked to be on the Local Development Plan's database / mailing list.

## **Contacting the Strategic Planning & Housing Team**

### **What is the email address?**

Please email us, the Strategic Planning & Housing Team, at [planningpolicy@denbighshire.gov.uk](mailto:planningpolicy@denbighshire.gov.uk)

### **What is the postal address?**

Strategic Planning & Housing Team

Denbighshire County Council

PO Box 62

Ruthin

LL15 9AZ

### **What is the phone number?**

01824 706916

## **Gwybodaeth i'r Wasg – CDLI Sir Ddinbych 2018 – 2033 – Ymgynghoriad ar Safleoedd Ymgeiswyr Ychwanegol**

Roedd Cyngor Sir Ddinbych wedi ymgynghori ar y Strategaeth ddrafft a Ffefrir ar gyfer ei Gynllun Datblygu Lleol (CDLI) y llynedd. Ynghyd â'r ymgynghoriad hwn, roedd y Cyngor wedi cyhoeddi cofrestr o'r holl safleoedd a anfonwyd i mewn gan ddatblygwyr a thirfeddianwyr ar gyfer ystyriaeth fel rhan o'r CDLI newydd. Roedd nifer o safleoedd newydd wedi eu cyflwyno yn ystod yr ymgynghoriad diwethaf ac mae'r Cyngor nawr yn cyhoeddi'r rhain i roi cyfle i'r cyhoedd ac eraill wneud sylwadau arnynt.

Mae'n rhaid pwysleisio nad yw'r safleoedd hyn yn geisiadau cynllunio ac nid oes unrhyw sôn ynglŷn â pha un a gynigir iddynt gael eu cynnwys yn y CDLI newydd ai peidio. Mae'r cyfnod ymgynghori yn syml i ganiatáu i unrhyw un wneud sylwadau a fydd yn hysbysu'r asesiad am y safleoedd yn y dyfodol.

Mae'r ymgynghoriad yn cael ei gynnal o **13 Ionawr 2020 i 13 Mawrth 2020**. Mae manylion y safleoedd ar wefan Sir Ddinbych ac mae copïau papur ym mhob llyfrgell a siop un alwad.

## **Press info – Denbighshire LDP 2018 – 2033 – Additional Candidate Sites Consultation**

Denbighshire County Council consulted on the draft Preferred Strategy for its Local Development Plan (LDP) last year. Alongside this consultation, the Council published a register of all the sites that had been sent in by developers and landowners for consideration as part of the new LDP. A number of new sites were submitted during the last consultation and the Council is now publishing these to give the public and others the opportunity to comment upon them.

It must be stressed that these sites are not planning applications and nor is there any indication as to whether they may be proposed to be included in the final LDP or not. The consultation period is simply to allow anyone to make comments that will inform the assessment of the sites in the future.

The consultation runs from **13<sup>th</sup> January 2020 to 13<sup>th</sup> March 2020**. Details of the sites can be found on the Denbighshire website and paper copies are at all libraries and one stop shops.

Denbighshire Local Development Plan 2018 - 2033  
Preferred Strategy - Consultation Responses  
February 2023

Appendix 9

## Key Issues

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>Climate Change, renewable energy, and Biodiversity</b>			
<b>777</b> <b>842</b> <b>1095</b>	<p>Welcome inclusion of renewable energy generation and need for infrastructure capacity. Reduction in energy use and resource consumption should also be encouraged.</p> <p>In light of declared Climate Emergency LDP needs to provide positive policy framework for all types of renewable energy generation and grid connection infrastructure, infrastructure for decarbonisation of heat and transport networks.</p> <p>Welcome inclusion of objective for protection of natural resources. And Objective supporting provision, operation and development of infrastructure and services.</p> <p>Climate Change and Species Extinction/Loss of Biodiversity should frame the whole plan. Should be key issue and priority. Climate change should be at top of list not bottom. In balancing needs climate change should take priority.</p>	<p>Policies on climate change mitigation, reducing carbon emissions renewable energy and Active Travel will be included in the Deposit LDP.</p> <p>Draft Preferred Strategy contains key policy on the natural &amp; built environment which stipulates the preservation and enhancement. The emerging Local Development Plan is also subject to a Strategic Environmental Assessment with Sustainability Appraisal and Habitats Regulations Appraisal.</p> <p>The key issues are not listed in any priority order</p>	<p>Policies on climate change mitigation, reducing carbon emissions renewable energy and Active Travel will be included in the Deposit LDP.</p>
<b>Visitor Economy</b>			

1315	<p>Support intention to support quality tourism products. Detailed policies will be required in the Deposit LDP.</p> <p>Draft Preferred Strategy should make more reference to the economic importance of tourism to Denbighshire as evidenced in the Employment Land and Economic Growth Assessment 2019.</p> <p>Suggested rewording Key Issues and challenges to include: “Ensuring that the visitor economy is enhanced and sustained by continuing to develop quality tourism products and pursuing opportunities to extend the tourism season.”</p>	<p>The visitor economy is covered in the existing wording of the objective under key economic sectors and the rural economy. It is not practical to list specific economic sectors in a strategic objective.</p>	No change proposed.
<b>Natural and Built Environment</b>			
144	<p>Welcomes identification of ‘the protection and enhancement of the natural, built and historic environment’ as one of the key issues and challenges. This encompasses the aspiration to conserve and enhance nationally protected landscapes such as the AONB, which has the full support of the committee.</p>	Support welcomed	No change required.
<b>Minerals</b>			



<b>547</b>	Suggest amended wording to reflect PPW	Agree that the key issues and challenges should be amended as follows: Need to agree position with the minerals industry regarding areas of search or preferred areas or site-specific allocations to ensure an adequate supply of a diverse range of minerals is available over the long term".	Change wording as indicated in Deposit version of the LDP.
<b>Housing growth</b>			
<b>1390</b>	<p>Consider growth levels proposed will not meet housing needs objective.</p> <p>Concern over reliance on Bodelwyddan Strategic Site to deliver 400 units.</p> <p>Approach is contrary to draft NDF growth areas for north Wales. Northern corridor should deliver over 19,400 additional homes.</p>	<p>Housing growth figures have been arrived at using robust methodology and are considered sound. Growth levels chosen are above the baseline figures of the 2014 Welsh Government projections which have formed a fundamental part of the evidence base in developing the preferred growth option for housing.</p> <p>Bodelwyddan Strategic site to be removed from Preferred Strategy.</p> <p>Land allocations will be in conformity with Future Wales 2040.</p>	<p>No change proposed</p> <p>Remove Bodelwyddan Strategic Site from Preferred Strategy.</p> <p>Allocations and policies in the Deposit LDP will be developed in conformity with Future Wales 2040.</p>

## LDP Vision

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>144 1390</b>	Support for Vision, particularly recognition that the County's 'high quality environment will be protected and enhanced'. Objective 4 covers need to protect and enhance the natural, built and historic environment, which includes the AONB and many of its special qualities	Support Welcomed	No change proposed
<b>777</b>	Needs to acknowledge the serious oncoming challenges that climate change brings.	The Vision will be amended to include reference to climate change.	The Vision will be amended to include reference to climate change.
<b>1315</b>	The proposed vision should specifically include a reference to supporting the tourism industry and tourist accommodation, given their role as key contributors to the local economy and a major source of local income and employment.	The visitor economy is covered in the existing wording of the objective under key economic sectors and the rural economy. It is not practical to list specific economic sectors in a strategic objective.	No change proposed.
<b>1390</b>	Need to balance protection of the high-quality environment with releasing sufficient land for housing.	Support welcomed. Key aim and objective of the LDP is to balance competing needs.	No change proposed

## LDP Objectives

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
777 797 1390	Climate change mitigation and adaptation should be addressed. Objective 8 should be amended. Objectives should address Active Travel and promotion of public transport.	The LDP objectives, including Objective 8, will be amended to include reference to climate change mitigation, reducing carbon emissions, renewable energy and Active Travel. Detailed policies will be included in the Deposit LDP.	Objectives, including Objective 8 in the Preferred Strategy will be amended to include reference to 'mitigation', reducing carbon emissions, renewable energy and Active Travel.
575 797	The plan should be more ambitious than national targets on mitigating climate change and addressing flood risk.	National targets are often set by UK and Welsh legislation and statutory instruments which provide tools for enforcement, ensuring that those targets are delivered. LDPs guide the determination of planning applications and prescribing policies beyond that of national policy will either result in the LDP not being followed or development not being delivered due to being unviable. LDPs must be in conformity with national policy, including Technical Advice Note 15 which addresses Flood Risk.	Objectives, including Objective 8 in the Preferred Strategy will be amended to include reference to 'mitigation', reducing carbon emissions, renewable energy and Active Travel.
1390	Objectives should be more detailed with guidance on how they will be achieved and measured.  There should be an additional objective on the role of SME housebuilders in delivering new housing.	Detailed policies and a comprehensive monitoring framework will form part of the Deposit LDP.  Disagree, an objective on the role of SME housebuilders is not an appropriate strategic objective for a Local Development Plan.	No changes proposed.

1315	There should be an objective recognising the importance of sustainable tourism to support visitor economy policies.	The visitor economy is covered in the existing wording of the objective under key economic sectors and the rural economy. It is not practical to list specific economic sectors in a strategic objective.	No change proposed.
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## LDP Soundness

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>Consultation Arrangements</b>			
<b>276</b> <b>966</b> <b>978</b> <b>1014</b> <b>1016</b> <b>1017</b> <b>1126</b> <b>1121</b> <b>1148</b> <b>1153</b> <b>1154</b> <b>1158</b> <b>1299</b> <b>1309</b> <b>1328</b> <b>1354</b>	<p>Consultation arrangements and timescale inadequate for meaningful engagement.</p> <p>Poor levels of public involvement due to lack of publicity.</p> <p>Residences affected directly by proposed changes to LDP should be written to directly</p> <p>The timing of the consultation on the draft Preferred Strategy was inappropriate being over the summer months.</p>	<p>The Council carried out the public consultation in line with the Welsh Government approved 'Community Involvement Scheme' and Council-internal requirements.</p> <p>Consultation was held over 8 weeks which is in excess of the 6 weeks required. Drop in sessions were held in the north, central and southern areas of Denbighshire and were well attended. Paper copies of all documents were made available in all libraries and One-Stop-Shops for those with no on-line access. Officers were available on the telephone or in person by appointment. Over 2,500 representations have been received which indicates that the consultation successfully engaged with a significant number of people and organisations. There will be the opportunity to make additional comments</p>	No change proposed.

		during the Deposit consultation stage in 2023.	
<b>Test 2 – Is the Plan Appropriate</b>			
<b>1390</b>	<p>Consider fails Test 2 Is the Plan Appropriate? On grounds of failure to fully address housing growth required or fulfil ambitious growth targets required.</p> <p>Housing growth levels must be considered as a minimum not a cap.</p> <p>Additional allocations required to make up for under delivery in current LDP.</p>	<p>Housing growth levels were arrived at using 2014 based population and household projections as set out in PPW. The growth levels have been reviewed in light of the 2018 based projections and are considered still be sound.</p> <p>Levels of housing delivery will be monitored annually following adoption. Significant variation from the agreed housing trajectory will trigger a review of the Plan.</p>	No change proposed
<b>1390</b>	<p>Evidence base not sound, unclear how housing land requirements will be met.</p> <p>Housing land supply composition in Appendix 2 fails to provide details of how it is broken down.</p>	Detailed housing trajectory will be embedded in Deposit LDP.	Deposit LDP will include detailed housing trajectory.

	Consider LDP is not sufficiently flexible and fails to provide appropriate contingency for housing growth.	A 15% contingency is considered appropriate and sufficient to provide flexibility in the LDP alongside the necessary degree of certainty for communities.	
<b>Test 3 – Will the Plan deliver?</b>			
<b>1390</b>	Do not consider LDP is effective, sufficiently robust or fit for purpose. Concerns over evidence base underpinning housing requirement and feel not aspirational enough. Reliance on strategic site that has failed to deliver since 2013 raises significant concern.	Housing growth levels have been arrived at using 2014 based population and household projections as set out in PPW. The growth levels have been reviewed in light of the 2018 based projections and are considered still be sound.  Bodelwyddan strategic site to be removed from Replacement LDP Preferred Strategy	No change proposed.  Remove Bodelwyddan Strategic Site from Replacement LDP Preferred Strategy.
<b>1390</b>	Further input to extent of infrastructure required to deliver the LDP is required	An Infrastructure Plan will be prepared to accompany the Deposit LDP.	An Infrastructure Plan will be prepared to accompany the Deposit LDP.
<b>369</b>	Collaboration with neighbouring local authorities needs to be demonstrated particularly in respect of employment growth along the A55 corridor.	Comments noted. The Council works closely with neighbouring authorities and this work will guide the development of the Deposit LDP.	Information on collaboration with neighbouring authorities will form background evidence for the Deposit LDP.

## Growth strategy

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>Support for Housing Growth Strategy proposed</b>			
<b>144</b> <b>703</b> <b>754</b> <b>812</b> <b>832</b> <b>831</b> <b>908</b> <b>966</b> <b>1089</b> <b>1165</b> <b>1166</b> <b>1269</b>	Support preferred growth level proposed of land for 3775 to deliver 3275 new homes.	Support welcomed.	No change proposed
<b>Sustainability and Environmental Factors to consider in relation to Housing growth</b>			
<b>936</b> <b>1010</b> <b>1048</b> <b>1095</b> <b>1052</b> <b>1128</b> <b>1150</b> <b>1159</b> <b>1160</b> <b>1188</b>	<p>Support for growth option 1 but concern that continued growth is unsustainable.</p> <p>Growth levels should be reduced below Welsh Government projections in light of the climate emergency.</p> <p>Planned growth must respect environmental impacts.</p> <p>Development should be on brown not green field sites outside of settlement boundaries.</p>	<p>Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population.</p> <p>Growth option 1 was discounted as it potentially would not deliver enough market and affordable housing to meet the county's needs.</p> <p>Denbighshire does not have sufficient brown field land to meet housing needs and some green field sites will be required.</p>	No change proposed

843 1299	Grade 1 agricultural land should be protected from development.	Grade 1 agricultural land and the need to protect BMV land in general will be a key consideration in the assessment of candidate sites.	
<b>Employment Considerations linked to Housing Growth</b>			
812 832 831 936 1010 1178 1299	<p>Concern over uncertainties associated with Brexit, Northern Powerhouse and HS2</p> <p>Existing unemployment and underemployment should be taken into account for employment led models.</p> <p>Need to increase jobs as well as housing.</p>	<p>Wider economic factors will impact on the LDP but Denbighshire is not in a position to influence them.</p> <p>The LDP is regularly reviewed which will enable any wider influences to be taken into account.</p>	No change proposed
<b>Consider Housing Growth levels to be too high</b>			
843 845 932 1125 1299 1396	<p>Concern that housing growth is being considered when birth rates are falling. New housing not required.</p> <p>Growth estimates need to be justified many housing developments currently under construction in north Wales.</p> <p>Empty homes must be looked at to reduce the need for new housing.</p> <p>,</p>	<p>Even with a static or falling population the number of households is growing and generating additional housing need.</p> <p>Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population.</p> <p>DCC has an established programme for bringing empty homes back into use.</p>	No change proposed



1144 1148 1155 1158 1160 1161 1164 1178 1233 1316 1373 1375 1378 1396	<p>Consider growth level too high.</p> <p>Concern over robustness of housing figures.</p> <p>Concern that growth levels are very high and based on figures from South Wales.</p> <p>Need to see how housing demand figures relate to each village.</p>	<p>Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population.</p> <p>The population and household projections used are produced on a local authority basis and are therefore directly related to Denbighshire and not other areas. Growth levels for individual settlements have not yet been proposed. These will be included in the Deposit LDP and consulted upon.</p>	No change proposed
779	Why do we need land for 3775 when the housing requirement is for 3275 dwellings?	The LDP must include a contingency to allow for some sites not coming forward within the LDP period. A contingency of 15% has been allowed which is considered reasonable.	No change proposed
<b>Consider Housing Growth levels to be too low</b>			
126 703 1390 1410	<p>Housing growth figures should be higher. Using past trends includes a backlog created by recession years.</p> <p>Housing growth levels are less than half from existing LDP and will create an imbalance between housing and employment growth which is flawed. Low past build rates should not be used as a reason for reducing housing need</p>	<p>Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population.</p> <p>The LDP aims to meet local housing need.</p> <p>Housing growth levels are based on 2014 based Welsh Government population and household projections as required by PPW. Predicted growth in households in current LDP have not materialised and it would be</p>	No change proposed

	<p>requirement in rLDP. Current housing allocation not robust and deliverable esp KSS.</p> <p>Concern that the identified housing land supply in Appendix II of the draft preferred strategy is not robust and that growth levels for housing should be higher as a result.</p>	<p>inappropriate to continue with an inflated growth level that cannot be delivered. 64%<sup>1</sup> of completions have been recorded on allocated housing sites since the adoption of the LDP.</p> <p>No details have been provided as to which aspects of the land supply calculation are considered not to be robust. The Appendix states that the figures were indicative and would be refined as the LDP progressed. The situation regarding completions and sites with permissions will change monthly and will be updated periodically to reflect the latest position.</p>	
<b>Infrastructure Capacity and Constraint Concerns</b>			
<b>935</b> <b>1009</b> <b>1048</b> <b>1098</b> <b>1120</b> <b>1137</b> <b>1141</b> <b>1148</b> <b>1155</b> <b>1299</b> <b>1355</b> <b>1375</b>	<p>Concern over infrastructure capacity. Particularly health services, transport, education</p>	<p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.</p>	<p>No change proposed</p>
<b>1355</b>	<p>New housing should be directed away from flood risk areas.</p>	<p>New development will be directed away from areas of flood risk in assessment of candidate sites.</p>	<p>No change proposed</p>

<sup>1</sup> Denbighshire Annual Monitoring Report 2022

<b>908 1355</b>	Housing that supports the Welsh language is a priority and the language needs to be protected from inappropriate development.	Welsh language is a key priority in the LDP.	No change proposed
<b>276</b>	Concern that too many sites have been identified for inclusion in the LDP. Considers that impacts on infrastructure and services need to be assessed,	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.	No change proposed
<b>Detailed Comments on Housing Types and need</b>			
<b>1050</b>	Are extra care units included in new homes definition? If so are any planned for Llangollen? Will this reduce demand for family homes in the LDP?	The growth options encompass the whole housing market. The growth has not yet been allocated to individual settlements. Any extra care developments delivered will contribute to the total housing delivered over the LDP period.	No change proposed
<b>754</b>	Policies should support windfall housing within and on the edge of existing settlements as well as on allocated sites.	An allowance is made for windfall sites coming forward within development boundaries. Speculative developments outside of development boundaries should be resisted as contrary to National and local policy.	No change proposed
<b>779 1402</b>	Needs to be proportional to existing populations and needs to prioritise starter homes	Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population. Detailed policies concerning housing mix will be included in the Deposit LDP which will be subject to consultation.	No change proposed

908 1355 1402	Affordable Housing is a priority	<p>Affordable housing is a key priority in the LDP.</p> <p>LDP aims to make provision for a range of house sizes and types to meet the needs of the local population.</p> <p>Affordable housing viability is currently being assessed, this will inform the percentage required in the more detailed Deposit policies. Commuted sum mechanism and calculation formulae will also be included in detailed policies and accompanying Supplementary Planning Guidance on Affordable Housing.</p>	No change proposed
1378	Requires detail on the sites that already have planning permission.	<p>The annual Joint Housing Land Availability Study sets out details of all site 10+ units with planning permission. This document forms part of the evidence base for the LDP.</p> <p>A detailed assessment of current land supply will accompany the Deposit LDP and be consulted upon.</p>	No change proposed
<b>Key Strategic Site at Bodelwyddan</b>			
1178 1390	The Council has already approved the large area on housing land to the north of the A55 near Bodelwyddan, so all of these additional sites are questionable	<p>The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.</p>	No change proposed

## Spatial Strategy

The majority of comments recorded against the spatial strategy were generated due to a misunderstanding of the status of candidate sites. Many people appeared to think that these were housing allocations being proposed for inclusion rather than the full picture of all the sites submitted for consideration.

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
749 779 789 1010 1089 1279 1355	Concern over infrastructure capacity in general where no specific settlement was identified	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable. New residential development is to be delivered in line with identified infrastructure need, which is to be discussed with and delivered by individual service providers.	No change proposed
30 144 749 846 908 932 935 1097 1269 1390 1410	Supports Spatial Strategy	Support Welcomed	No change proposed

<b>369</b>	There is no information within the plan setting out the spatial distribution of housing and its components. On this basis it is difficult to ascertain if the strategy is appropriate, compliant with the key locational principles of PPW, in particular promoting sustainable travel patterns, or whether it is deliverable.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision, with the aim of ensuring that development will promote sustainable travel patterns. The Deposit LDP will include site allocations in line with the spatial strategy defined in the Preferred Strategy.	
<b>482</b> <b>843</b> <b>844</b> <b>951</b> <b>1083</b> <b>1089</b> <b>1097</b> <b>1269</b>	Concerned about loss of green field land and loss of agricultural land.	National policy set out in Planning Policy Wales prioritises the use of previously developed land over greenfield sites, subject to the detail of the proposal. The Local Development Plan will reflect this approach.  Denbighshire does not have sufficient brown field land to meet housing needs and some green field sites will be required.	No change proposed
<b>777</b> <b>1355</b>	The Strategy can, and should, facilitate our behaviour change to reduced resource and energy consumption, climate change mitigation and reversal of biodiversity decline.	The LDP is a means of guiding sustainable development which includes having consideration of environmental impacts, climate change. The LDP does facilitate such behaviour if its strategy, spatial strategy, policies and supplemental guidance is followed, and development is only approved when it is in accordance with the LDP	No change proposed

<b>703</b> <b>716</b> <b>754</b> <b>841</b> <b>908</b> <b>1140</b> <b>1156</b> <b>1297</b>	<p>More homes are needed in all parts of the county not just the biggest sites. More development should be allowed in rural areas. This will support affordable housing for agricultural workers and support the Welsh Language.</p>	<p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. There will be provision for more limited growth in rural areas to meet local needs.</p>	<p>No change proposed</p>
<b>30</b> <b>936</b> <b>1279</b>	<p>Growth should be restricted to main and local centres only to reduce transport needs.</p> <p>Public Transport service should not be used to justify development in rural areas, it does not reduce reliance on the private car.</p>	<p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. There will be provision for more limited growth in rural areas to meet local needs. Rural communities need some level of growth to remain sustainable.</p>	<p>No change proposed</p>
<b>1145</b> <b>1269</b> <b>1316</b>	<p>Green barriers should be retained to ensure settlements remain distinct.</p>	<p>There is a general presumption against development in Green Belt/ Green Wedge / Green Barrier but Planning Policy Wales outlines some exceptions as long as the proposal is not inappropriate in relation to the purpose of the designation. All current Green Barriers will be reviewed as part of the preparation of the Deposit LDP.</p>	<p>No change proposed.</p>

<b>575</b>	Spatial option does not reflect the results of SFCA, LDP Vision, key issues etc. re flood risk; all main centres and local centres are at risk from fluvial or tidal flooding	Spatial option sets out broadly where new development is going to take place without being site specific. Detailed site assessment will have regard to these documents. Spatial option is compliant with draft NDF (now Future Wales 2040) for North Wales.	No change proposed.
<b>126</b>	The strategy does not meet the suggested requirements of the Draft NDF in supporting economic growth in the Coastal corridor.	Spatial option sets out broadly where new development is going to take place without being site specific. Detailed site assessment will have regard to these documents. Spatial option is compliant with draft NDF (now Future Wales 2040) for North Wales.	No change proposed.
<b>Comments relating to Main Towns</b>			
<b>Rhyl</b>			
<b>844 966</b>	Concern over scale of development and impact on infrastructure.	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon. The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	No change proposed



<b>703 1410</b>	Support for designation of Rhyl as a main centre and supports housing growth there.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision.	No change proposed
<b>276</b>	Concern that additional growth will lead to the merging of settlements, especially Rhyl. Prestatyn, Rhuddlan and Meliden.	No sites are currently proposed for inclusion in the LDP. The Candidate Sites Register shows those sites that have been submitted for consideration only. Proposed land allocations will be consulted upon at the Deposit LDP stage in 2020. Current Green Barriers and development boundaries will be reviewed with a view to maintaining the separation of individual settlements.	Information noted, will inform assessment of candidate sites.
<b>Prestatyn and Meliden</b>			
<b>819 844 929 931 950 951 963 964 965 966 1003 1014 1016 1017 1126 1132 1134</b>	Concern over scale of development in Prestatyn and Meliden and the impact on infrastructure and highway safety.	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon. The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	No change proposed

1135 1139 1141 1142 1144 1153 1154 1157 1158 1160 1169 1215 1309 1328 1345 1375 1389 1393			
276 951 983 1135	Concern over potential merging of settlements in Prestatyn and Meliden area.	No sites are currently proposed for inclusion in the LDP. The Candidate Sites Register shows those sites that have been submitted for consideration only. Proposed land allocations will be consulted upon at the Deposit LDP stage in 2020. Current Green Barriers and development boundaries will be reviewed with a view to maintaining the separation of individual settlements.	No change proposed.
703	Support for designation of Prestatyn as a main centre and supports housing growth there.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision.	No change proposed

St Asaph			
1242	Concern regarding level of growth proposed for St Asaph and impact on infrastructure.	<p>The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.</p> <p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.</p>	No change proposed
703	Support for designation of St Asaph as a main centre and supports housing growth there.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision.	No change proposed
Denbigh			
1053 1147	Concern regarding level of growth proposed for Denbigh and impact on infrastructure.	<p>The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.</p>	No change proposed

<b>703 924</b>	Support for designation of Denbigh as a main centre and supports housing growth there.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision.	No change proposed
<b>1010</b>	Recent developments are impacting negatively on the Welsh language.	Welsh language considerations have been undertaken in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of potential sites and the Welsh language will be provided in the Deposit plan.	No change proposed
<b>Ruthin</b>			
<b>1314 1330</b>	Concern regarding level of growth proposed for Ruthin and impact on infrastructure.	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.	No change proposed
<b>703 924</b>	Support for designation of Ruthin as a main centre and supports housing growth there.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision.	No change proposed
<b>822 1010 1314</b>	New physical, environmental and social infrastructure needed to support new growth.  Recent developments are impacting negatively on the Welsh language.	New development in Ruthin is to be delivered in line with identified infrastructure need, which is to be discussed with and delivered by individual service providers.	No change proposed

		Welsh language considerations have been undertaken in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of potential sites and the Welsh language will be provided in the Deposit plan.	
<b>Llangollen</b>			
<b>629</b> <b>749</b> <b>770</b> <b>777</b> <b>788</b> <b>813</b> <b>861</b> <b>914</b> <b>926</b> <b>935</b> <b>970</b> <b>994</b> <b>1026</b> <b>1041</b> <b>1051</b> <b>1077</b> <b>1090</b> <b>1091</b> <b>1095</b> <b>1096</b> <b>1102</b> <b>1106</b> <b>1108</b> <b>1109</b>	<p>Concern regarding level of growth proposed for Llangollen and impact on infrastructure. Llangollen is physically constrained by topography.</p>	<p>The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.</p>	No change proposed

1117 1118 1127 1150 1159 1202 1203 1244 1245 1234 1262 1265 1268 1272 1296 1346 1351 1363 1370 1371 1382 1400 1403			
926 1090 1095 1096 1105 1106 1133 1150 1159	Affordable Housing needed in Llangollen	There is an established need for affordable housing across the county as set out in the Local Housing Market Assessment 2019.	No change proposed

<b>1245</b> <b>1346</b> <b>1351</b> <b>1368</b> <b>1370</b> <b>1371</b>			
<b>1089</b> <b>1091</b> <b>1150</b> <b>1159</b>	<p>Upgrading of Llangollen to a main settlement is not justified due to population and infrastructure.</p> <p>Llangollen is listed last under policy PSE 6 in recognition that the town centre is larger than can be sustained by the local population and is supported by short stay tourism.</p>	<p>Evidence as set out in the Background Paper: settlement Assessment defines Llangollen as a main settlement in view of its role in providing a range of services for an area wider than the town itself. Llangollen is listed last in PSE 6 as the settlements are listed in order from north to south in Denbighshire. It does not reflect their relative importance.</p>	No change proposed
<b>1068</b> <b>1172</b>	<p>Happy to see Llangollen grow and prosper if the supporting local employment roads sports facilities and infrastructure are also in place to support this</p>	<p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.</p>	No change proposed
<b>889</b> <b>902</b>	<p>Need for employment land in Llangollen</p>	<p>Comments regarding the need for employment land in Llangollen are noted and further work on assessing potential sites will be undertaken as part of preparatory work on the Deposit LDP.</p>	<p>Further work on assessing potential employment sites to be undertaken as part of preparatory work on the Deposit LDP.</p>
<b>Bodelwyddan</b>			

908 924 1150 1159 1233	Supports strategic site at Bodelwyddan but must be high quality and include Active Travel	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
126 369 547 703 797 823 824 1273 1279 1390	Concerns over deliverability and sustainability of the Bodelwyddan strategic site given lack of delivery in current LDP period. Development should be spread more evenly across Denbighshire. Strategic site has not delivered and the onus is now on the LPA to demonstrate it can be delivered in the new LDP.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
126	Consider strategic site is contrary to draft NDF which directs growth to coastal settlements in Denbighshire to support Deeside/Wrexham growth area.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
<b>Dyserth &amp; Rhuddlan</b>			



<p>276 966 1121 1132 1153 1154 1157 1158 1160 1375</p>	<p>Concern over scale of development and infrastructure capacity in, Dyserth and Rhuddlan. Feels that these areas should not be focus for development.</p>	<p>Evidence as set out in the Background Paper: Growth Level options Report 2019 supports the need for new housing to meet the needs of the population.</p> <p>The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.</p> <p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.</p>	<p>No change proposed</p>
<p>703</p>	<p>Dyserth has been classified as a Local Centre and housing growth should be supported. Important to allow for limited growth of infill plots within the rural areas to ensure a sustainable future and support of the Welsh language.</p>	<p>The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.</p>	<p>No change proposed</p>
<p><b>Villages</b></p>			
<p><b>Llanfair Dyffryn Clwyd</b></p>			

<b>812</b> <b>831</b> <b>832</b> <b>937</b> <b>938</b> <b>1161</b> <b>1163</b> <b>1165</b> <b>1166</b> <b>1421</b>	Llanfair DC has seen considerable growth in recent years and a period of consolidation is required before more significant development is considered. Infrastructure capacity needs time to adjust.	Recent developments and permissions will be taken into account when assessing how much, if any, allocated growth will be directed to individual settlements. This will be set out in the Deposit LDP and fully consulted upon.	No change proposed
<b>703</b>	Llanfair Dyffryn Clwyd has been classified as a Village and housing growth should be supported. Important to allow for limited growth of infill plots within the rural areas to ensure a sustainable future and support of the Welsh language.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	No change proposed
<b>Pwllglas</b>			
<b>1379</b> <b>1405</b>	Concerned at scale of development for Pwllglas and impact on landscape and well-being.	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.	No change proposed
<b>Rural Areas</b>			

<b>1010</b>	The intention to develop hamlets in the countryside, by allowing the erection of affordable houses, by local people, under strict control, is to be warmly welcomed. This is a great opportunity for young and old people to be able to stay in their communities and close to their roots.	Sufficient development to sustain rural settlements will also be included in the Deposit LDP.	No change proposed.
<b>703</b>	Denbigh Green has been not been classified in the settlement hierarchy, however housing growth should be supported. Important to allow for limited growth of infill plots within the rural areas to ensure a sustainable future and support of the Welsh language.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	No change proposed

## Comments relating to all policies

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>1135</b>	Land is finite resource and concern raised regarding focus on economic land value rather than amenity and psychological values. Designating green fields for speculative residential development causes stress and despair to many residents. Numerous homogenous housing developments have degraded the character in the Prestatyn, Rhyl, Rhuddlan, etc. area over the years.	The LDP aims to meet local housing need. There is insufficient brown field land available to meet this need and some green field allocations will be necessary. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will be included in the Deposit LDP and consulted upon.	No change proposed
<b>1164</b>	Key policies are not detailed assessments of each LDP site, with assessments to be made at the planning stage. However when the planning stage is reached, the thorough assessments are sidelined because planning has been "approved in principle". This means site development presses on without any regard for the local character of the area.	All local policy and proposed site designations are fully assessed in line with legislative requirements, conformity with national policy and potential constraints. After the 'principal of development' has been established at Plan-making stage, greater availability of information allows detailed assessment of proposals for sites and the local impact when a planning application is assessed.	No change proposed
<b>1089</b>	All of these policies are laudable and the range comprehensive.	Support welcomed.	No change proposed

## Key Policy – Placemaking

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
1410 842 846 144	Policy is supported.	Support welcomed	No changes are proposed.
788 1146	More undeveloped land, green spaces, green corridors including hedgerows and areas of wild planting must be protected and retained.	Key Policy 'Placemaking' incorporates the efficient use of scarce land resources and the enhancement of the natural environment.	No change proposed.
842 846	Include renewable energy under this key policy.	It should be noted that there will be a policy on 'renewable energy' in the Deposit LDP.	No change proposed. The Deposit LDP will include local policies on 'renewable energy'.
1390	Policy should not impose requirements that impact on viability and thus scheme deliverability. Particularly concerned about decarbonisation and renewable energy technology.	The Well-being of Future Generations (Wales) Act 2015 places a duty on policy makers to ensure that development is sustainable. By outlining in the key policies the likely requirements, developers can assess appropriate land values for sites in advance and withdraw any sites they feel will become viable, prior to the allocation of preferred sites in the Deposit LDP.	Comments noted. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.
777 797	The policy should focus on promoting net zero, high levels of efficiency and leading the way in reducing and mitigating climate change. Sustainable drainage schemes should be put in place. Net zero development needs to be delivered.	The Well-being of Future Generations (Wales) Act 2015 places a duty on policy makers to ensure that development is sustainable.  Sustainable drainage is a statutory requirement on developments of more than	A local policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.

		1 dwelling or construction area of more than 100m <sup>2</sup> .  Detailed policies relating to zero carbon will be included in the Deposit LDP.	
144 829 935	Maintaining and enhancing the natural environment is important. The wording should be changed to 'Conservation and enhancement of the natural environment'. Distinct differences in locations and geological landscapes should be appreciated.	Comments noted. Change agreed to achieve consistency in wording with biodiversity policy.	The Deposit LDP will refer to 'Conservation and enhancement of the natural environment'
829 1316	Promoting health and wellbeing is important and it should be supported by requiring all new developments to be of a high-quality design. Impacts on residents that are affected by new development should also be considered.	Comments noted. The provisions of the Wellbeing of Future Generations (Wales) Act 2015 are considered in every planning decision that is made by the Council.	No change proposed.
1077	Car use should not be encouraged unless there are no local transport services available including buses.	Key policy on transport and accessibility specifically supports Active Travel for daily routes. Candidate Sites are assessed regarding access to public transport and cycle networks.	No change proposed.
789	Reduce the amount of jargon in local policies.	The Council aims to reduce the number of technical terms that are used in the new LDP but 'placemaking' merely reflects Welsh Government / national terminology.	No change proposed.
126 1390	Clarification is sought on whether all criteria must be met to achieve policy compliance. Suggest using "and" "or" to clarify. Local policy to be aligned with national policy and strategies.	Agreed, policy will be amended accordingly. Local policies in the Deposit LDP will be drafted so that it is clear whether all the criteria must be met and in compliance with national policy.	Local policies in the Deposit LDP will be drafted so that it is clear whether all criteria must be met and in compliance with national policy.

## Key Policy – Welsh Language

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>1150</b> <b>144</b> <b>1410</b> <b>777</b> <b>812</b>	Maintaining and enhancing the integrity of the Welsh Language is supported. Behaviour change must be encouraged.	Support is welcomed. Comments noted. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.	No change proposed
<b>846</b> <b>1390</b>	Importance should not be placed on the Welsh Language policy, and it should not limit or prohibit regeneration. It should not be an overriding factor in the determination of otherwise sustainable developments. Perhaps less emphasis could be placed on it in areas with low numbers of Welsh speakers.	Comments noted. Welsh Language has been considered in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of the Welsh Language will occur to inform development of detailed policies to be consulted upon as part of the Deposit LDP.	No change proposed
<b>1379</b>	Welsh language will probably diminish.	Comment noted. The aim of the policy is to help facilitate the use of the Welsh Language in Denbighshire.	No change proposed
<b>1355</b>  <b>Non attributed comment</b>	Welsh Language and Affordable Housing must be seen as priorities.  No development should be permitted that can harm the Welsh Language. The use of Welsh should be encouraged at every opportunity. Providing a Welsh name on an estate of houses is not enough in itself to sustain and develop the Welsh language. Securing jobs and well-being facilities provides rewarding opportunities for maintaining the Welsh language in	Comment noted.  Welsh Language has been considered in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of the Welsh Language will occur to inform development of detailed policies to be consulted upon as part of the Deposit LDP.	No change proposed

<p><b>1355</b></p> <p><b>Non attributed comment</b></p>	<p>all communities. Remote communities where over 50% of residents use Welsh every day should be protected.</p>		
<b>716</b>	<p>If as a county we are to contribute to aim of 1 million Welsh speakers, it needs to be acknowledged that the Welsh language is more dominant in rural areas.</p>	<p>Comments noted. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.</p>	<p>No change proposed.</p>
<b>369</b>	<p>There is no explanation whether the Welsh language has influenced the scale and location of housing growth. The Welsh language policy does not set a threshold or identify Welsh language sensitive areas. This should occur in the Deposit plan together with the requirement for Language Impact Assessments on 'unanticipated' windfall sites only.</p>	<p>Welsh language considerations have been undertaken in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of potential sites, 'windfall' sites and the Welsh language will be provided in the Deposit plan.</p>	<p>No change proposed</p>
<p><b>861</b> <b>1095</b> <b>1344</b></p>	<p>Development should be appropriate to the settlement's and communities needs in respect of Welsh language, size, amenities and services. New houses must only be built where they are needed by the community. A high number of new houses, particularly in Llangollen, will threaten the language and culture of an area or community.</p>	<p>Comments noted. Welsh language considerations have been undertaken in the sustainability appraisal, settlement hierarchy and key policies. Further detail and assessment of potential sites and the Welsh language will be provided in the Deposit plan.</p>	<p>No change proposed</p>



	More needs to be done to protect Welsh speaking communities.	Comments will inform development of detailed policies to be consulted upon as part of the Deposit LDP.	
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## Key Policy – Housing

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>1041</b> <b>1095</b>	Need to restrict second home ownership in tourist areas to combat housing shortages.	Affordable housing is restricted to households with a local connection and is secured as affordable in perpetuity. Welsh Government are bringing in a range of measures at the national level to address the issue of second homes and short-term holiday lets.	No change proposed
<b>276</b> <b>1095</b> <b>1150</b> <b>1159</b> <b>1379</b>	Affordable housing percentage needs to be higher.  More council housing must be built	The delivery of affordable housing to meet local needs is a key priority for the replacement LDP. Various mechanisms for delivering affordable housing will be set out in the Deposit Plan.  The LDP aims to meet local housing need. There is an established need for market and affordable housing. The Council is now able to build a limited number of new council houses, and these will be included in the LDP totals.	No change proposed

<b>126</b> <b>1390</b> <b>1410</b>	Housing requirement needs to be increased	Level of housing growth is supported by evidence and has been set at a level above the mid-point estimates to allow for more ambitious growth.	
<b>126</b> <b>1390</b>	Need for range of product types is supported but a specific mix should not be imposed as may not be appropriate in all locations.	Suggested housing mix is important to ensure that developments meet the identified housing needs of the County. There will be a degree of flexibility but any site constraints that impact on viability should be identified by the site promoter at Candidate Site stage.	No change proposed
<b>1303</b>	Need for provision of accommodation and appropriate care facilities for older people as population age increases.	The Local Development Plan aims to address the housing needs for the whole population, including older people.	No change proposed.
<b>1410</b>	Cannot focus solely on brownfield land, green field sites will be required to meet housing needs	Denbighshire does not have sufficient brown field land to meet housing needs and some green field sites will be required.	No change proposed.
<b>1157</b>	Need to focus on empty homes	DCC has an established programme for bringing empty homes back into use.	No change proposed
<b>797</b>	Small builders and self-builders should also be supported through access to land.	Detailed housing policies relating to all parts of the market will be included in the Deposit LDP.	No change proposed
<b>1125</b>	New estates need to develop its own identity, avoiding standard design. DCC should lead the way in building eco-friendly and attractive houses	Comment noted	No change proposed.

## Key Policy - Affordable Housing

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>126</b> <b>824</b> <b>716</b> <b>929</b> <b>1346</b> <b>1355</b> <b>1390</b>	<p>Support principle of provision of affordable housing.</p> <p>Need affordable housing to support rural communities, for the younger generation, first time buyers (not prospective landlords) &amp; allow older people to remain in rural communities.</p> <p>Should be more emphasis on affordable housing as a priority.</p>	<p>Support welcomed</p> <p>The delivery of affordable housing to meet local needs is a key priority for the replacement LDP. Various mechanisms for delivering affordable housing will be set out in the Deposit Plan. Affordable housing is restricted to households with a local connection and cannot be rented out by private landlords.</p>	No change proposed.
<b>1143</b>	The Council should not only provide affordable housing but more Council housing should be provided throughout the County.	The Council is now able to build a limited number of new council houses and these will be included in the LDP totals.	No change proposed.
<b>1297</b>	Does the policy take account of the National Development Framework concerning the increase in delivery of affordable housing?	The draft Preferred Strategy was published prior to the publication of the NDF. The Deposit LDP will take account of the NDF (Future Wales: The National Plan) and be subject to consultation.	The Deposit LDP will take account of Future Wales: The National Plan.

<b>144</b> <b>369</b> <b>777</b> <b>936</b> <b>1355</b> <b>1390</b> <b>1410</b>	<p>750 new affordable homes welcomed.</p> <p>Affordable housing requirement of 750 should be increased. Level proposed is inadequate, a more challenging target should be set.</p> <p>Unclear where 750 requirement has come from.</p> <p>The LDP should explain how Local Housing Market Assessment and viability has influenced the requirement. Concerns that 750 falls short of needs identified in the LHMA.</p>	<p>The requirement for affordable housing will be reviewed and based on needs identified in the Local Housing Market Assessment currently being completed.</p>	<p>The requirement for affordable housing will be reviewed and amended to reflect the conclusions of the Local Housing Market Assessment.</p>
<b>1390</b>	<p>Cannot see how 750 affordable houses can be delivered without a review of settlement boundaries.</p>	<p>All settlement boundaries will be reviewed as part of the process of allocating sufficient land to meet the required growth levels.</p>	<p>No change proposed.</p>

<b>126</b> <b>1150</b> <b>1159</b> <b>1390</b>	<p>No guidance provided on the percentage of affordable housing required or a trigger threshold. Should be informed by viability assessment.</p> <p>Affordable housing percentage needs to be higher, 20% and 10-30% suggested.</p> <p>Percentage should vary according to local demand, impact on communities &amp; provide for realistic growth for local residents who mainly work locally.</p>	<p>Affordable housing viability is currently being assessed, this will inform the percentage required in the more detailed Deposit policies. Commuted sum mechanism and calculation formulae will also be included in detailed policies and accompanying Supplementary Planning Guidance on Affordable Housing</p>	<p>Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.</p>
<b>1361</b>	<p>Concerns that affordable housing is bought by people from outside the area to rent.</p>	<p>Affordable housing is restricted to households with a local connection and cannot be rented out by private landlords.</p>	<p>No change proposed.</p>
<b>1379</b>	<p>Will housing be locally affordable?</p>	<p>Detailed policies in the Deposit LDP and accompanying Supplementary Planning Guidance on Affordable Housing will aim to ensure that affordable homes are locally affordable.</p>	<p>Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.</p>
<b>1297</b> <b>1390</b>	<p>Should include reference to viability.</p> <p>Affordable housing should be provided on site and integrated into development unless local/site circumstances prove otherwise.</p> <p>Not viable for small sites to support affordable housing delivery and provision should be made for off-site contribution or delivery</p>	<p>Affordable housing viability is currently being assessed, this will help to inform the percentage required in the more detailed Deposit policies. Commuted sum mechanism and calculation formulae will also be included in detailed policies and accompanying Supplementary Planning Guidance on Affordable Housing.</p>	<p>Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.</p>

	Policy should be flexible to allow for reduced AH requirements where evidenced by viability appraisals.		
<b>753</b>	Would like to propose an investigation into the suitability of using land between Abbey Road and Harding Avenue for building starter homes.	The land is not in council ownership and has not been submitted as a candidate site which would make delivery improbable.	No change proposed

### Key Policy - Employment land

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>812 831 832</b>	Former Llanfair DC school could be used as business incubator like Technology House in Rhewl.	Land at the former Llanfair DC school has been submitted as candidate site, ref. CS-20E-169, with the intention of promoting residential use. All candidate sites are being assessed with regard to the proposed form of land use.	No change proposed.
<b>1050</b>	Llangollen – existing premises are well supported and in demand. Any support for starter units at Cilmedw?	Retention of employment land at Cilmedw is supported by “Employment Land and Economic Growth Assessment (2021)”. Business support to be discussed with DCC Economic Business Development team.	No change proposed.
<b>144</b>	Support; subject to individual land allocations. New local policy on employment land should include criteria that aim to protect natural environment and designated landscapes, such as AONB. Guidance is welcomed.	Support welcomed. All development proposals have to comply with natural environment legislation and policy. Guidance to be provided in form of Supplementary Planning Guidance.	No change proposed.

<b>970</b>	Preferred Strategy has not identified any employment land sites. Start-up units are required.	Safeguarded employment areas and proposed allocations to be shown in Deposit LDP. Business support to be discussed with DCC Economic Business Development team.	No change proposed.
<b>1410</b>	Support the provision of a range of employment sites in main centres, such as Rhyl.	Support welcomed. Safeguarded employment areas and proposed allocations to be shown in Deposit LDP.	No change proposed.
<b>1379</b> <b>1390</b>	Provision of more houses will also require an increase in employment land.	There is no causal link between the delivery of new homes and the need for more employment land as not all home owners are economically active.	No change proposed.
<b>797</b>	Small business community needs access to land and premises that comply with SuDS requirements, provide Active Travel opportunities and incorporate renewable energy.	Safeguarded employment areas and proposed allocations to be shown in Deposit LDP. Development proposals have to comply with legislation and policy.	No change proposed.

### Key Policy – Town Centres and Retail Development

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>812</b> <b>831</b> <b>832</b>	Llanfair would benefit from a village store.	Local policy to address the provision and protection of shops and services in rural areas.	Deposit LDP to include local policy on the provision and protection of shops and services in rural areas.

<b>925 1056</b>	Prestatyn - additional retail development will have an adverse effect on traffic.	Additional traffic movements are material in determining planning proposals for new retail development.	No change proposed.
<b>144</b>	Support for key policy in principle but provision must also be made in rural areas.	Local policy to address the provision and protection of shops and services in rural areas.	Deposit LDP to include local policy on the provision and protection of shops and services in rural areas.
<b>777 1346</b>	No new or extension to out-of-town retail development.	National policy – new development has to be directed towards established town centres. Balanced view to be taken in terms of improving existing facilities in other locations.	No change proposed.
<b>1410</b>	Support for retail hierarchy. Flexibility needs to be introduced in terms of providing new retail facilities in alternative but sustainable locations outside the town centre.	Local policy to conform with national policy. Planning Policy Wales sets out sequential approach to the selection of new sites which could evidence the need to be located outside an existing town centre.	Deposit LDP to include local policy on the provision of shops and services outside an established town centre.

### Key Policy – Bodelwyddan Strategic Site

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>0 144 1150 1159</b>	Support site development.  Masterplan should identify opportunities for renewables technology and coherent development of a vibrant new settlement.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.



		economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	
<b>1410</b>	Generally supported. The policy should include a site-specific delivery trajectory at the next LDP stage to provide certainty, to allow the delivery performance of the site to be monitored and to allow for contingencies, set out in policy, to be implemented if delivery slips.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
<b>126 369 936 1390</b>	Site not deliverable and should not be rolled forward. No key evidence to justify rolling forward. Concerns raised on the 'soundness' of the plan's strategy.  No need for site and does not align with other draft policies.  Strategy is reliant on strategic site coming forward. Failed to do so since 2013.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
<b>1390</b>	Concern over mixed use aspect. St Asaph BP has significant vacancies. Evidence to suggest that additional employment land is not required.	Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.

		proposed to take this site forward in the Replacement LDP.	
<b>1390</b>	<p>Bodelwyddan should be classified as a village rather than a local service centre.</p> <p>Scale of strategic site inappropriate in this location and will account for the majority of the growth over the next plan period. Would need several developers on site simultaneously to generate required level of housing delivery, this and low market demand would impact on deliverability of site. Site reliant on Growth Deal to progress, no timescale on delivery. Other sites will be required to deliver housing requirement in LDP.</p> <p>Appendix 2 of PDS makes allowance of 40 units at Bodelwyddan SS up to 2033. Further information required on trajectory and delivery details.</p>	<p>Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.</p>	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.
<b>777</b>	How will Bodelwyddan Strategic Site improve the transport and travel situation in St Asaph?	<p>Due to significant concerns about the deliverability of Bodelwyddan Strategic Site within the plan period the site has been removed from the North Wales Growth Deal. Without support from the Growth Deal, development of this site will not be economically viable and it is no longer proposed to take this site forward in the Replacement LDP.</p>	Delete Bodelwyddan Strategic Site from the draft Preferred Strategy.

## Key Policy – Infrastructure

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>831</b> <b>832</b> <b>333</b> <b>812</b> <b>30</b> <b>842</b> <b>1390</b> <b>144</b> <b>234</b>	<p>The policy is supported as it takes a holistic approach, supports sustainable tourism, encourages sustainable transport, discourages car use, directs development to sustainable locations where infrastructure is available and requires mitigation of new development as well as improvements in infrastructure and local facilities.</p>	Support welcomed.	No change proposed.
<b>842</b> <b>846</b> <b>234</b>	<p>Developers can progress improvements to provide infrastructure improvements, secured either via the planning S106 obligation or under the requisition provisions of the Water Industry Act. Therefore, request that water management (supply, drainage and treatment) is included in the list of infrastructure contained in the policy wording. The paragraph should be expanded to cover electricity, heat and broadband. The wording should make it easy to enforce the policy and allow for financial contributions to deliver improvements.</p>	<p>Comments noted. Water management change agreed because utilities are essential to any development. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.</p>	<p>Include ‘water management’ (i.e. water supply, treatment) as an additional bullet point in key policy ‘Infrastructure’.</p> <p>Detailed policies will be contained in the Deposit LDP and expanded to include other forms of infrastructure.</p>
<b>777</b> <b>30</b>	<p>Welcome incorporation of Active Travel that is comprehensive and linked to local infrastructure. Developers should improve and contribute to active travel networks.</p>	<p>Support welcomed. The Council has produced an Active Travel - ‘Integrated Network Map’ (including one for Llangollen) which will be the basis for any future extensions to the existing network.</p>	No change proposed.

		Key Policy 'Transport & Access' requests developments to make provision for Active Travel.	
<b>963</b> <b>1125</b> <b>1157</b> <b>1261</b> <b>964</b> <b>789</b> <b>842</b> <b>925</b> <b>173</b> <b>966</b> <b>1134</b> <b>1406</b> <b>276</b> <b>964</b> <b>1137</b> <b>789</b>	Concerns raised on the capacity of the current infrastructure and services (road network, public transport, parking facilities, utilities, water, sewage, education, schools, health and social services) and its ability to be able to support new development particularly without financial measures to support improvements. A request for policies that support the delivery of additional infrastructure and services prior to constructing new homes.	Infrastructure capacity to be assessed strategically at Plan-making stage in consultation with service providers. The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.
<b>843</b> <b>1126</b> <b>276</b>	Concerns about increased pressures arising from more houses, more cars, more people and climate change: water supply, road maintenance in extreme weather and how the natural environment can be safeguarded and pollution, including air pollution limited.	<p>Consideration to be addressed in specific local policy.</p> <p>New development proposals will be assessed with regard to local highway capacity, access to public transport and the promotion of Active Travel.</p>	A local policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.
<b>126</b> <b>1390</b>	Bodelwyddan Strategic Site should not be relied upon. It conflicts with the infrastructure policy. Infrastructure constraints are preventing it from being delivered.	Bodelwyddan Strategic Site, including supporting infrastructure, to be assessed and delivered in phases.	No change proposed.

		If required, the Council will specify the type of 'other Council priorities', including any potential contributions.	
<b>144</b>	The committee would like greater recognition of the potential impact of development on the AONB and opportunities to invest developer contributions in the protected landscape to mitigate impacts, particularly in relation to the provision of recreational and green infrastructure and the promotion of active travel.	Consideration to be addressed in specific local policies – AONB, Green Infrastructure, and Biodiversity.	Deposit LDP to include specific local policies on AONB, Green Infrastructure, and Biodiversity.
<b>276 1390 964 1137 812 234</b>	The Council should consider robust mechanisms to receive reasonable levels of funding from developers (or landowners benefitting from uplift of value) to provide for infrastructure and provision of essential services associate with growth, both locally and at a more strategic scale. Policies need to ensure there are suitable requirements to mitigate the impact of new development.	Infrastructure capacity to be assessed strategically at Plan-making stage and in detail as part of the development management process. Residential development proposals are assessed regarding the need for additional infrastructure and the financial or physical contribution that can be reasonably be requested from the developer. These comments will inform development of detailed policies to be consulted upon as part of the Deposit LDP.	No change proposed.  Detailed policies will be contained in the Deposit LDP.
<b>1056</b>	Prestatyn is known as the gateway to the North Wales coast. It has a long and interesting history, with a number of historical features remaining.	Comment noted.	No change proposed.

## Key Policy – Visitor Economy

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
831 832 333 1285 1315	Policies supporting and encouraging tourism including rural tourism are welcomed as they provide opportunities for the region. Contributions to tourist attractions help the visitor economy and sustainable transport routes as well as providing leisure, recreation, health and well-being benefits.	Support welcomed.	No change proposed.
144	The reference to environmental safeguards in the visitor economy policy is supported although it is recommended that the wording be changed to '...conserve and enhance the county's natural and built environment.'	Comment noted. Detailed policies relating to the Visitor Economy will be contained in the Deposit LDP and will be consulted upon.  Wording will be amended to '...conserve and enhance the county's natural and built environment.'	Wording will be amended to '...conserve and enhance the county's natural and built environment.'
1315 1285 812	Detailed policies should relay the positive economic impacts of tourism including all year-round tourism. They should reflect a positive approach to supporting new high quality tourism development as well as the growth, enhancement and/or diversification of existing tourism businesses. This positive approach should be applied to visitor attractions, visitor facilities and a broad range of different types of holiday accommodation e.g. hotels, chalets, bunkhouses, static and touring caravan and camping sites.	Comments noted. Detailed policies relating to the Visitor Economy will be contained in the Deposit LDP and will be consulted upon.	No change proposed.

## Key Policy – Transport and Accessibility

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>831</b> <b>832</b>	There is a need to improve cycling and footpath facilities in the area.	Key policy enforces the need for new developments to make provision for Active Travel and green infrastructure, which should include network extension and route maintenance.	LDP Objectives to be amended to include reference to Active Travel.
<b>333</b>	Policy covers the principal matters that are relevant to Llangollen Canal.	Comment noted.	No change proposed.
<b>1132</b>	Further development in the Dyserth, Meliden and Rhuddlan area will adversely affect the insufficient highways infrastructure.	New development proposals will be assessed with regard to local highway capacities and, if required, incorporate any improvement works to road and safety facilities.	No change proposed.
<b>1141</b>	Transport infrastructure is already stretched, with limited investments in improvement works.	New development proposals will be assessed with regard to local highway capacities and, if required, incorporate any improvement works to road and safety facilities.	No change proposed.
<b>14</b>	Support the emphasis on active travel, green infrastructure and links with wider networks	Support welcomed.	No change proposed.
<b>1315</b>	Supports the key policy in principle but considers that the Council should adopt a more flexible approach to sustainable transport which accounts for the local context.	Support welcomed. Depending on the nature of the development proposal, the local context might be material in the determination process.	No change proposed.

<b>908</b>	<p>Road improvements are required between Ruthin and the north of the County, especially between Rhewl and Llanrhaeadr. It would improve the flow of people and goods.</p> <p>Commends the fact that providing safe cycling and walking routes are an integral part of any planning application for building housing estates. There is demand for additional safe routes between local settlements, especially for cyclists.</p>	The Local Development Plan will support the delivery of proposals contained in the North Wales Joint Local Transport Plan; subject to no conflict with planning policy.	No change proposed.
<b>812</b>	Llanfair DC Community Council has provision in its Neighbourhood Plan to improve cycling and footpath facilities in the area.	The Council will support the implementation of the Neighbourhood Plan; subject to legal provisions and local policy.	No change proposed.
<b>1344</b>	Wales sets new climate change targets. New housing developments would increase carbon emissions.	New housing developments will be built in line with latest building standards to minimise carbon emissions.	Local policy to be included in Deposit LDP on the subject of climate change and carbon reduction.
<b>1369</b>	Road between Llangynhafal to Llanbedr requires upgrade works to improve traffic flow	Local highway capacity to be considered in the candidate site assessment process.	No change proposed.
<b>30 1390</b>	Support the aim to minimise car use. Developers should improve and extent Active Travel network around new developments.	Support welcomed. Improvements to Active Travel network to be delivered as part of developments to ensure integration of new infrastructure and user-friendliness.	No change proposed. Comment will however influence policy formulation in the Deposit LDP.
<b>1379</b>	Concerns about creating more volume of traffic in this rural village.	New development proposals will be assessed with regard to local highway capacities and, if required, incorporate any improvement works to road and safety facilities.	No change proposed.



<b>970</b>	There has been a failure to support and develop sustainable travel.	Key policy and amended LDP objective reinforces the need for new developments to make provision for Active Travel, including bike lanes, where appropriate and green infrastructure, which should include network extension and route maintenance.	LDP Objectives to be amended to include reference to Active Travel.
<b>797</b>	All new and existing developments must be proofed for walking and cycling access by 2025. There are too many villages that do not have pavements, 20mph zones, or clearly marked cycling routes. It is essential that new development provide pavements, cycling routes, and help to fund retrofit for existing areas.	Key policy and amended LDP objective reinforces the need for new developments to make provision for Active Travel and green infrastructure, which should include network extension and route maintenance.	LDP Objectives to be amended to include reference to Active Travel.

## Key Policy - Minerals

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>144</b>	Policy wording should explicitly state that there is the need to direct new mineral extraction away from environmentally sensitive areas such as the AONB.	Comments noted. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.	Comments noted. Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.
<b>547</b>	The wording needs to reflect the wording of PPW.	LDPs have to accord and expand on PPW. LDPs should not repeat the wording of PPW. The paragraph promotes the use of recycled and secondary sources of aggregate in accordance with PPW.	No change required.

<b>1390</b>	The need to safeguard minerals needs to be balanced against housing needs to ensure that the Vision & Objectives are deliverable and achievable.	Comments noted. The primary aim and objective of the LDP is to balance competing needs.	No change required.
<b>369</b>	Address RTS requirement in Deposit Plan with an appropriate policy framework.	Comments noted.	Policies in the draft Deposit LDP will be drafted to ensure consistency with national policies including the latest Regional Technical Statement.

### Key Policy - Waste Management

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>144</b>	Support, but would recommend that wider environmental safeguards be included in the policy. Revised wording could include '...unacceptable impacts on amenity or the natural or built environment.'	Comments noted. Policies in the Draft LDP will be drafted to reflect the recommendation to include wider environmental safeguards.	Policies in the Draft LDP will be drafted to reflect the recommendation to include wider environmental safeguards, to ensure that proposals for waste management facilities do not result in unacceptable impacts on amenity or the natural or built environment.
<b>908</b>	Support the need to ensure that waste is reduced as resources for recycling improve.	Comment noted and support welcomed.	No change proposed.

## Key Policy - Natural and Built Environment

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>547</b> <b>831</b> <b>832</b> <b>908</b> <b>925</b> <b>1056</b> <b>1315</b> <b>1390</b>	<p>Keen to see proposals that enhance the natural capital of the area.</p> <p>Focus on locally sourced building materials.</p>	<p>Key policy specifically states 'All proposals must contribute towards the preservation and, where possible, the enhancement of the natural and built environment, including SSSIs and Ancient Woodlands.</p>	<p>No change proposed.</p> <p>Consideration of reference to the local vernacular and locally sourced building stone will be made in the Deposit Plan.</p>
<b>812</b> <b>841</b> <b>932</b> <b>1095</b> <b>1126</b> <b>1150</b>	<p>More emphasis on environmental concerns required.</p>	<p>Key policy specifically states 'All proposals must contribute towards the preservation and, where possible, the enhancement of the natural and built environment, including SSSIs and Ancient Woodlands.</p>	<p>No change proposed.</p>
<b>276</b> <b>812</b> <b>844</b> <b>908</b> <b>1095</b> <b>1128</b>	<p>Concern around flood risk issues</p> <p>Need to protect green spaces and focus on green infrastructure</p>	<p>Key policy specifically states 'All proposals must contribute towards the preservation and, where possible, the enhancement of the natural and built environment, including SSSIs and Ancient Woodlands. A Green Infrastructure Assessment will be provided alongside the Deposit LDP.</p> <p>Detailed policies for the protection of existing open space and to ensure that new developments make appropriate provision for open space will be consulted upon at the Deposit LDP stage in 2020.</p>	<p>No change proposed.</p> <p>Policies for the protection of existing open space and to ensure that new developments make appropriate provision for</p>

			open space will be included in Deposit LDP.
<b>812</b> <b>845</b> <b>924</b> <b>925</b> <b>932</b> <b>1056</b> <b>1095</b> <b>1126</b> <b>1150</b>	<p>Nature and preservation of natural resources are key in light of climate change emergency.</p>	<p>Consideration to be addressed in specific local policy.</p>	<p>A local policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.</p>
<b>144</b>	<p>Recommend to substitute the word 'qualities' for 'characteristics', it is also recommended that 'conservation' be substituted for 'preservation'.</p> <p>Disappointed that there is no specific reference to the nationally protected landscape of the AONB.</p>	<p>Key policy 'Natural &amp; Built Environment' does already refer to 'protected characteristics' and 'preservation'.</p> <p>Comments noted and a local policy will be included in Deposit LDP with regard to Clwydian Range and Dee Valley Area Of Outstanding Natural Beauty.</p> <p>Both the AONB and WHS Management Plans will form part of the LDP evidence base</p>	<p>A local policy will be included in Deposit LDP with regard to Clwydian Range and Dee Valley Area of Outstanding Natural Beauty.</p>
<b>346</b>	<p>Policy heading and supporting text should refer to natural, built and historic environment.</p>	<p>Comments noted and policies on the natural environment, built and historic and cultural environment will be included in the Deposit LDP</p>	<p>Policies on the natural environment, built and historic and cultural environment will be included in the Deposit LDP.</p>
<b>1315</b>	<p>Request an additional paragraph to be included in key policy:</p>	<p>Each application must be determined in accordance with the adopted development</p>	<p>No change proposed.</p>

	“Development proposals that may result in an adverse impact on the character of the built and natural environment will be considered according to their merits, and subject to appropriate mitigation measures which address any adverse impacts.”	plan unless material considerations indicate otherwise.  If the proposal, including any measures to prevent adverse effects from occurring, complies with policy then planning permission may be granted.	
<b>1369</b>	Understand that building in the open countryside is contrary to the Wellbeing of Future Generations Act.	Well-being of Future Generations (Wales) Act 2015 does not preclude development in the open countryside. However, the LDP Preferred Strategy seeks to focus development in existing settlements.	No change proposed.
<b>1390</b>	Policy supported in principle but policy needs separating out into 1) natural environment and 2) historic and cultural environment to ensure the requirements of each are met. Policy should differentiate between statutory and non-statutory environmental designations.	Comments noted and policies on the natural environment, built and historic and cultural environment will be included in the Deposit LDP	Policies on the natural environment, built and historic and cultural environment will be included in the Deposit LDP

## Suggested Policies

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>1120</b> <b>1122</b> <b>843</b> <b>575</b>	Flood risks and water resilience should be included in policies or there should be a specific local flood risk policy.	Resilience to the impact of climate change is referenced in the Preferred Strategy key policy: Placemaking. Policies will be drafted in greater detail in the Deposit Plan and flood risk will be included.	Flood risk will inform assessment of candidate sites and reference to flood risk will be included in the Deposit LDP policies.

966 935 1141 1355 333	We need a policy that addresses services including health, care, education, social and community services. The fact that the population is aging needs to be taken into account. We need a local policy on community health and wellbeing.	A comprehensive range of detailed policies will be included in the Deposit LDP and consulted on. This will include a local policy relating to community health and wellbeing.	A local policy relating to community health and well-being will be included in the Deposit LDP.
932 1068 1147 935 1150	Seeks local policies addressing community facilities. This includes opportunities for children, protecting and replacing sporting facilities and youth centres. The policies should facilitate a One-Stop point regarding local matters such as cultural issues and day to day issues, like bin collection dates and bus timetables. The policies should also seek funding for community projects by using means such as a Community Infrastructure Levy / Developer Contributions.	Comments noted. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon. This will include a local policy relating to community health and wellbeing. The Preferred Strategy Key Policy 'Infrastructure' includes reference to education.	A local policy relating to community health and well-being will be included in the Deposit LDP.
788 935 1140	Seeks local policies that improve the health and well-being of communities, namely through access to open spaces, parks, play spaces such as for ball sports as well as recreation and leisure facilities.	Comments noted. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon. This will include a local policy relating to community health and wellbeing. The Preferred Strategy Key Policy 'Infrastructure' includes reference to the provision of infrastructure.	A local policy relating to community health and well-being will be included in the Deposit LDP.
1148 716 333	There should be local policies covering infrastructure including green and blue infrastructure as well as public transport for all. The policies should encourage investment in local infrastructure, improve safety and reduce congestion.	Subject to be addressed as part of the North Wales Joint Local Transport Plan.  A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon.	No change proposed.

<b>1125</b> <b>1128</b> <b>936</b> <b>779</b> <b>908</b> <b>843</b> <b>333</b>	Need to include a local policy to tackle climate change, achieve net zero and carbon neutrality. Policies should promote sustainability, environmental building practices, renewable energy technologies and alternatives to plastics, especially single use plastics. The excessive use of plastic must be reduced in all locations that belong to or are under the control of Denbighshire County Council.	The use of plastic, single use plastic and environmental building practices are not subject to land use planning so cannot be controlled in the LDP. The draft LDP Preferred Strategy contains key policy 'Placemaking' that promotes decarbonisation and renewable energy technology. A policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.	A policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.
<b>770</b>	Indefinite growth is unsustainable and building on brownfield sites should be prioritised and promoted. There should be policies supporting the conversion of old buildings and protecting existing recreational areas.	National policy set out in Planning Policy Wales prioritises the use of previously developed land over greenfield sites, subject to the detail of the proposal. The Local Development Plan will reflect this approach.  Denbighshire does not have sufficient brown field land to meet development needs and some green field sites will be required.  Local policy on re-use of old buildings to be included in Deposit LDP.	Include local policy in Deposit LDP regarding the re-use of redundant buildings.
<b>843</b> <b>770</b> <b>1147</b>	Policies should consider food and water resilience including wastewater, sewage. In suitable locations, such as on industrial sites, recycling plants should be encouraged; particularly those that can provide useful by products such as energy to local communities.	Comments noted. Resilience to the impact of climate change is referenced in the Preferred Strategy key policy: Placemaking. Flood risk will inform assessment of candidate sites. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon. This	A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon. This will include scope for alternative uses on industrial sites, flood risk and a local policy addressing climate change

		will include scope for alternative uses on industrial sites, flood risk and a local policy addressing climate change mitigation and reducing carbon emissions.	mitigation and reducing carbon emissions.
<b>823</b>	Seeks a local policy on addressing the needs of Gypsy and Traveller communities.	Comments noted. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon.	No change required.
<b>547</b>	The objectives of the plan policies should be to deliver the material requirements of the Regional Technical Statement (RTS).	Policies are a guide to delivering sustainable development and balancing competing social, economic and environmental demands.	Consideration will be given to the RTS when detailing the policies in the Deposit Plan.
<b>845</b>	Citizens assembly requested.	Topic is not dealt with in a land use planning document.	No change proposed.
<b>1050</b>	Seeks local policy on supporting tourism in the County.	Draft LDP Preferred Strategy contains a key policy on the 'visitor economy'. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon.	No change proposed.
<b>1164 333</b>	Seeks local policy on archaeology and protecting buildings of local historic significance.	Comments noted. A comprehensive range of detailed policies will be contained in the Deposit LDP and will be consulted upon.	No change required.



## Sustainability Appraisal

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
831 832 829 1125 812 575 1157	Sustainability should be at the forefront of any considerations. The sustainability appraisal is a good resource which provides very useful data to understand the information on which decisions have been made. The nature conservation sites listed in Table 14 are agreed. Fields, used regularly by walkers, and habitats cannot be replaced or replicated elsewhere. Human health and wellbeing, as well as climate change, together with its potential impacts on both humans and wildlife, must be taken seriously and be part of the consideration of sustainable development.	Comment noted and support for the SA welcomed. The SA will inform the assessment and refinement of proposals for the Replacement LDP.	No change proposed.
936 843	The SA is not a full assessment of climate change measures and does not promote renewable energy technologies such as solar panels or electric vehicle charging points. It is not outward looking and assumes growth including population growth with the consumption of finite resources and without taking into account factors external to Denbighshire. Tenant farmers and farmer owners should have more input. The SA objectives should look for improvements and monitor reductions in pollution levels as well as increases in open space rather than just ensuring the position does not deteriorate.	The SA is assessing the Replacement LDP which will distribute development throughout Denbighshire. Climate change, sustainability including the use of finite resources are considered at a local or where appropriate, regional level. Policy consideration is undertaken at a level where the local planning authority can positively contribute. Flexibility is built in to enable the plan to respond at a local level to unknown external factors. National policy and legislation, guides development on a national basis and will contribute to the global picture. There are limits to what can be accomplished through local development	No change proposed.  A local policy on climate change mitigation and reducing carbon emissions will be included in the Deposit LDP.

		<p>plans, their policies and then in practice by development management.</p> <p>The SA is not intended to assess all climate change measures, to be a monitoring framework, to trigger actions or to prescribe policies.</p> <p>New local policies to promote renewable energy technologies, address climate change mitigation and the reduction of carbon emissions will be included in the Deposit LDP</p>	
<b>1089</b> <b>Non attributed comment</b>	While the SA is reasonably comprehensive and well-worked in most respects, the section on minerals omits slate quarrying/potential use of slate spoil heaps. What is the position in respect of shale gas and other mining? The issue of whether there is any potential for commercial reclamation is at least worthy of mention.	<p>Comments noted.</p> <p>There is no active coal mining within the County. Licensing for shale gas rests with Welsh Government who have stated they will not support any new licensing for fracking for shale gas.</p> <p>Consideration will be given to a commercial reclamation policy in the Deposit Plan.</p>	Commercial reclamation minerals policy to be considered in Deposit Plan.
<b>844</b> <b>770</b>	More should be done to develop brownfield land. There are plenty of brownfield sites and empty old structure should be prioritised for affordable housing.	The current (and the next) LDP (will) include(s) a local policy on 'brownfield development priority', in line with national policy.	Deposit LDP will seek to prioritise brownfield sites for development.
<b>932</b> <b>Non attributed comment</b>	SA does not address the issue of getting people into work. Children need an interest that can develop into skilled work. This can be achieved by providing a safe and stimulating environment which will also	Comments noted. LDP Objectives and Key policy Employment Land set out that land will be provided to meet the County's employment needs, these will allow for	No change proposed.

	benefit the locality. Local business development is required. Many people who live here commute, so other areas are benefiting economically from their skills, it's bad for the environment, and puts pressure on parents to find out-of-school supervision. Reliable and affordable transport is required to enable young people accessing employment opportunities outside the local area.	business start-ups, investment, expansion and growth including rural areas. The SA assists in assessing and balancing the economic and social requirements of the County against any potential harm or enhancement of the environment for both people and ecosystems.  New employment land development should focus on places with access via active travel or public transport, in line with the 'transport hierarchy' in Planning Policy Wales.	
<b>1128</b>	The Environmental Baseline should include an assessment of tree coverage and there should be policies in place to increase tree coverage and reduce carbon emissions.	A tree count has not been undertaken for the county and currently there is no available data to provide such a baseline. Landscape and environmental policies are proposed within the Preferred Strategy to protect existing tree coverage. The design policies in the Deposit Plan will include requirements for trees, flora and fauna planting as part of new developments.	No change proposed.
<b>716 754 908</b>	The sustainability appraisal needs to recognise that new development is needed in some communities in order to sustain them, retain their populations, Welsh speakers and community wellbeing. Infill and small sites need to be attractive to investors. These are the sites that are more likely to reduce the level of depopulation in our rural communities. The mitigating actions and monitoring are also important.	The new LDP will try to allow the development of small sites and infill where necessary and it is sustainable to do so. The Appraisal of Sustainability helps to assess and balance the County's economic and social requirements against any potential damage or improvement to the environment for people and ecosystems. Support for the	No change proposed.

		mitigation and monitoring measures is welcome.	
<b>1159</b> <b>1122</b> <b>1126</b>	Indefinite growth is unsustainable, it is detrimental and should not be taken as a 'given'. Wanting to build all these houses looks as though you do not know the meaning of 'sustainability'.	Comments noted. The Replacement LDP proposes growth for the County for a finite period up to 2033 and will allocate land to distribute development growth in a sustainable manner as guided by the SA. Growth figures are proposed having considered evidence that stipulates what the employment and residential need and demand is within the county.	No change proposed.
<b>369</b>	Best and Most Versatile (BMV) Agricultural Land / SA - SA must assess the impact of the spatial strategy on Grade 3a agricultural land. WG will not accept any further loss of BMV agricultural land without significant justification and application of the sequential test in PPW.	Comments noted. Table 21 in the SA is a draft monitoring framework which will be reviewed and revised as the plan progresses.  Welsh Government Agricultural Land Classification mapping is used to review existing site allocations and assess candidate sites. BMV loss will only be considered in line with national policy.	SA to be reviewed at Deposit Plan stage with consideration given to monitoring framework and BMV agricultural land.  Ensure SA fully reflects national policy requirements on the use of BMV land.
<b>1343</b>	LPAs must consider the impact of loss of habitats in the LDP. (Conservation of Habitats Regulations 2010)	The draft LDP and all contained proposals are subject to Habitats Regulations Appraisal, in line with provisions contained in 'The Conservation of Habitats and Species Regulations 2017'. The Habitats Regulations Appraisal for the Draft Preferred Strategy can be viewed via the Council's website.	No change proposed.
<b>1135</b> <b>1233</b> <b>1316</b>	Open space, SSSIs and green belt areas benefit communities and wellbeing. These areas should be protected and not developed. Candidate sites should assess the impact of proposed development on	Noted. Accessibility of public transport and community facilities will form part of assessment of candidate sites.	No change required.

	community identity, public amenities and ensure that the allocated land is accessible by all, particularly by public transport.	The SA assists in assessing and balancing the economic and social requirements of the County against any potential harm or enhancement of the environment for both people and ecosystems. All candidate sites will undergo a sustainability assessment.	
<b>1164</b>	The document is too technical for laypeople to be able to comment on constructively, thus making a mockery of the consultation. A summary document without jargon should have been produced in the first instance.	A non-technical summary is provided at the start of the document.	No change proposed.
<b>575</b>	Lack of ecological air quality baseline information, especially with regard to Nitrogen Oxides, Ammonia, Sulphur Dioxide, Nitrogen deposition, Acid deposition; need to assess any effects on habitats and species listed in table 14.  Air pollution impacts on designated sites and Section 7 lists of the Environment Wales Act 2016 needs to be added to Table 35 of the SA.	Air quality baseline to be included in SA and HRA at Deposit stage.  Section 7 list – is the biodiversity list – list of living organisms and types of habitat which in Welsh Ministers opinion are of principal importance for the purpose of maintaining and enhancing biodiversity in Wales.  SA/SEA and HRA are two legally different processes which nevertheless inform each other to avoid any adverse effects on biodiversity. The HRA specifically focuses on internationally designated sites and species. This includes an assessment of increased air pollution impacts on them. Unlike HRA, SA/SEA is concerned with a wider range of species and habitats, including Section 7 list.	No change proposed.

<p><b>575</b></p>	<p>The assessment, objectives and indicators in relation to flood risk, including the sustainability appraisal matrix should be more effectively worded to direct development away from high flood risks areas, to reflect key issues and have greater correlation and interlinkages.</p> <p>There should be more information on rising sea levels, fluvial/ tidal flood risks, reservoir flooding, combined sewer flooding and the evidence base should be updated and assessed.</p> <p>The spatial options should be re-evaluated as there is an increased risk of flooding.</p> <p>The Appraisal should assess how the plan will help to manage flood risk in the long term, directing development from flood risk, managing flood risk to new development and reducing flood risks to existing communities.</p>	<p>Local Development Plans and Planning Policy Wales must be regarded in its entirety as must a Sustainability Appraisal. Linking all Objectives to each other results in unnecessary duplication and does not allow for a clear assessment of conflicting objectives.</p> <p>Directing new development away from flood risk areas, assessing fluvial / tidal flood risks and sea level change evidence is national policy as is TAN 15. These are not LDP Objectives or policies. Spatial option sets out broadly where new development is going to take place without being site specific.</p> <p>Detailed site assessment will have regard to flood risk and national policy, TAN 15. The spatial option is compliant with the draft NDF for North Wales.</p> <p>The new LDP will comply with national policy and a list of newly-emerged key data sources on flood risk will (be included and) inform the updated Strategic Flood Consequence Assessment (SFCA) in support of the draft Deposit LDP.</p> <p>The SA will assess the new LDP utilising the evidence of the SFCA and consider this as part of the SA objectives as well as cumulative effects as set out in Appendix B of the initial SA.</p>	<p>Review presentation of table 19 for ease of reading and assessments.</p> <p>Deposit LDP will include more detailed policies and assessment under the SA.</p>
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		<p>Whilst being crucial evidence, the SFCA does also inform the production of the SA/ SEA at Deposit LDP stage.</p> <p>The Council will ensure that the latest available evidence is going to be used throughout the plan-making process.</p> <p>Improving the resilience of local communities to flood risk is achieved with the help of several planning tools: (1) national and local policy; (2) installation of new flood defence features; and (3) updated evidence in support of proposals, for example SFCA and FCA.</p>	
<b>575</b>	SA does in its current form not reflect the several wellbeing goals it sets out to achieve.	The SA objectives were revised from the Scoping Report to ensure that they were broader and incorporated the wellbeing 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 and a globally responsible Wales are all represented in the SA objectives. SA Objective 2 was changed to “communities are healthier” to ensure that the well-being goal of a healthier Wales was appropriately captured and assessed.	No change proposed.
<b>575</b>	Section 12.2 and 12.3 seem to contradict each other – avoidance and mitigation measures should	Section 12.2 must be understood in relation to Habitats Regulations Appraisal whilst	No change proposed

	(normally) not be considered during the screening process	Section 12.3 refers to the SA/ SEA. It is understood that the appliance of mitigation measures is different in both regimes.	
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### Habitats Regulations Assessment (HRA)

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>812 831 832</b>	HRA document has been noted. Protection needs also be afforded to a range of other nature and landscape designations in the Llanfair DC area.	Comment noted. HRA is specifically concerned with the protection and enhancement of internationally designated sites of nature conservation.	No change proposed.
<b>789</b>	Summary link to be provided for phone users. Policy is welcomed.	Comment noted.	No change proposed.
<b>929</b>	Land between Gronant and Prestatyn (castle) needs to be kept green.	HRA is specifically concerned with the protection and enhancement of internationally designated sites of nature conservation.	No change proposed.
<b>1089</b>	This is satisfactory.	Comment noted.	No change proposed.
<b>1120</b>	HRA is flawed as animal habitats are always ignored.	HRA is concerned with the protection and enhancement of internationally designated sites of nature conservation; including species and their supporting habitats.	No change proposed.



<b>1122</b>	Wildlife on the hillside will be negatively affected.	HRA is concerned with the protection and enhancement of internationally designated sites of nature conservation; including species and their supporting habitats.	No change proposed.
<b>1125</b>	HRA should not be an afterthought.	HRA is carried out at all principal stages of the LDP preparation process.	No change proposed.
<b>1135</b>	Speculative housing estates don't provide any kind of habitat for wildlife.	HRA is concerned with the protection and enhancement of internationally designated sites of nature conservation; including species and their supporting habitats.  Housing proposals have to be considered in light of HRA.	No change proposed.
<b>1137</b>	Building on category one flood plains is very short sighted indeed.	HRA is specifically concerned with the protection and enhancement of internationally designated sites of nature conservation.	No change proposed.
<b>1141</b>	Protected trees are regularly felled.	Protection and enforcement of unauthorised tree falling is dealt with by the Tree Preservation Order.	No change proposed.
<b>1147</b>	Local people to be involved with these consultations.	Public was invited to comment on the HRA for the Preferred Strategy.	No change proposed.
<b>1164</b>	Previous assessments were flawed. They should have been carried out prior to site allocations in order to stop the removal of hedges and trees.	Adopted LDP complies with the provisions contained in the (UK) Habitats Regulations. Unauthorised tree felling and hedge removal are sanctioned in line with pertinent legal duties.	No change proposed.
<b>1178</b>	St Asaph Business Park – Great Crested Newt population has already lost vast foraging areas due to over-development.	New development at St Asaph Business Park is assessed regarding the likelihood of adverse effects on Great Crested Newts; assessments are consulted upon with Natural Resources Wales.	No change proposed.

<b>749 813</b>	Support the need for further HRA of draft local policy and land allocations. Protection needs also be afforded to a range of other nature and landscape designations in the Llangollen area.	Supported is welcomed. HRA is carried out at all principal stages of the LDP preparation process.	
<b>770</b>	Avoid short-term considerations and think about the generations to come.	The Well-being of Future Generations (Wales) Act 2015 and Planning Policy Wales place a duty on policy makers to ensure that development is sustainable.	No change proposed.
<b>575</b>	Agree with the methodology and initial screening result; especially the consideration of likely further appropriate assessment of individual Spatial Options and Draft Policies.	Support welcomed.	No change proposed.
<b>1010</b>	I assume DCC will comply with all regulations relating to habitat protection and consider the impact of the development, small or large on the particular site and surrounding areas.	Comment noted.	No change proposed.

### Further comments

Respondent Reference	Summary	Response	Recommended changes to Preferred Strategy
<b>General Comments</b>			
<b>154 803</b>	No comments on the Draft Preferred Strategy.	Noted.	No change proposed.
<b>812</b>	Welcome consultation on the LDP and look forward to closer liaison as the Plan progresses.	Support welcomed.	No change proposed.
<b>770</b>	Have the courage to make lasting, viable and caring decisions which benefit humankind and not the dubious, transitory approval of a minority.	Comments noted.	No change proposed.
<b>Comments on Consultation</b>			

<b>1369 1378</b>	Dissatisfaction with consultation on the Draft LDP Preferred Strategy and Candidate Sites. Insufficient time to engage in consultation	Public consultation, including means of consultation, requirements are laid out in the Community Involvement Scheme. This has been agreed with Welsh Government. The Preferred Strategy was out for consultation for an 8 week period, 2 weeks longer than the statutory requirement. A second opportunity to comment will arise when the Deposit Plan goes out for consultation.	No change proposed.
<b>Comments on Candidate Site Register</b>			
<b>1148 547</b>	Unsuitable locations should have been reviewed and removed prior to this stage in the process.  Online register should be categorised by proposal (housing, employment, minerals, etc) to negate the need to open each online tab.	Council is required to publish and consult upon all sites submitted to the LDP process. The majority of candidate sites are proposed for housing and it is easier for residents and other statutory undertakers to consider the impact of the proposals by settlement. Each site provides details of the proposal.	No change proposed.
<b>Background Evidence</b>			
<b>369</b>	Concerns raised as to the lack of supporting evidence on housing delivery, viability, Gypsy and Traveller Accommodation and renewable energy.	Comments noted. A new Gypsy Traveller Accommodation Needs Assessment has been completed to cover the plan period and will inform policies and site allocations in the Deposit LDP. Evidence on housing delivery, viability and renewable energy will underpin the development of policies and site allocations in the Deposit LDP.	The new Gypsy Traveller Accommodation Needs Assessment will inform policies and site allocations in the Deposit LDP. Evidence on housing delivery, viability and renewable energy will underpin the development of policies and site allocations in the Deposit LDP.

Sustainability and Environmental Factors to consider			
843 1374	High quality agricultural land should be protected from development.	National policy set out in Planning Policy Wales prioritises the use of previously-developed land over greenfield sites and aims to protect the use of best and most-versatile agricultural land, subject to the detail of the proposal. The Local Development Plan will reflect this approach.	
276	Concerns over flood risk and further development may increase this.	Flood risk is a key determining factor in the selection of land allocations and development proposals. Increasing flood risk will not be acceptable.	Will inform assessment of candidate sites.
843	Need to plan development now for electric cars & walking / cycling to work / public transport hubs - not locate new housing in rural locations with poor public transport.	The LDP Preferred Strategy seeks to focus development in settlements with services to help to reduce the need to travel. The Deposit LDP will include local policies on Active Travel.	The Deposit LDP will include local policies on Active Travel.
30 276 862 936 983 1179 1400 1403	Should protect natural environment. Use Brownfield land in preference to green spaces. Retain amenity and recreation spaces. Brown Field sites within towns should be used for affordable homes.	National policy set out in Planning Policy Wales prioritises the use of previously-developed land over greenfield sites, subject to the detail of the proposal. The Local Development Plan will reflect this approach. However, Denbighshire does not have sufficient brown field land to meet housing needs and some green field sites will be required.	Deposit LDP will seek to prioritise brownfield sites for development in line with national policy. Will inform assessment of candidate sites.
1115 1381	Green Belts should be protected from development.	There is a general presumption against development in Green Belt/ Green Wedge / Green Barrier but Planning Policy Wales outlines some exceptions as long as the	No change proposed.

		proposal is not inappropriate in relation to the purpose of the designation.	
<b>936 1052 1268</b>	Should reflect Denbighshire's Climate & Ecological Emergency Declaration and the Wellbeing of Future Generations Act. Housing construction needs to be to higher environmental standards, greater investment in Active Travel and public transport.	Policies on climate change mitigation, reducing carbon emissions renewable energy and Active Travel will be included in the Deposit LDP.	Policies on climate change mitigation, reducing carbon emissions, renewable energy and Active Travel will be included in the Deposit LDP.
<b>1353</b>	Scenic beauty of AONBs should be conserved. Housing targets should be lower in these areas and major development refused except in exceptional circumstances.	The Deposit Local Development Plan will include a local policy on the Area of Outstanding Natural Beauty, similar to current policy VOE2.	Deposit Local Development Plan to include local policy on the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty.
<b>575</b>	Preferred Strategy should have regard to North East Wales Area Statement (published in Spring 2020)	Deposit LDP will have regard to the North East Area Statement published by NRW.	Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.
<b>Infrastructure Capacity and Constraint Concerns</b>			
<b>917</b>	Concern about impact of development on infrastructure, including health services, highway safety.	The Preferred Strategy directs growth to main centres where there is better infrastructure and service provision. The Deposit LDP will include detailed policies relating to contributions to infrastructure improvements where necessary to make developments acceptable.	No change proposed.
<b>276</b>	Needs to be further investment in schools, Ysgol Pendref highlighted.	The Education department are fully engaged in developing the LDP.	No change proposed.
<b>Renewable Energy</b>			

369	<p>The NDF Priority Areas 3 &amp; 15 should be reflected in the plan.</p> <p>Deposit Plan should be informed by a Renewable Energy Assessment and include a renewable energy policy that provides opportunities for local renewable energy generation schemes and can be appropriately monitored.</p>	<p>The Draft Preferred Strategy was published for consultation prior to publication of the draft NDF (Future Wales: the National Plan), the draft Preferred strategy will be assessed for compliance prior to being finalised.</p> <p>Additional evidence and more detailed policies relating to renewable energy will be provided in conjunction with the Deposit Plan.</p>	<p>Policies on renewable energy, informed by the Renewable Energy Assessment and Future Wales: the National Plan, will be included in the Deposit LDP.</p>
<b>Minerals</b>			
547	<p>Should reference the Regional Technical Statement for aggregate, survey of Aggregate Minerals undertaken by Central Government &amp; BGS report.</p> <p>Table of key issues and challenges does not reference to safeguarding mineral resources or buffer zones.</p> <p>Need to reflect the wording of PPW and recognise the limitations of secondary recycled resources.</p>	<p>Comment noted. The updated Regional Technical Statement and BGS report will form key background evidence to inform the development of detailed policies and allocations in the Deposit LDP.</p> <p>The table of key issues and challenges are those considered by local members specifically in relation to Denbighshire. Safeguarding mineral resources and providing buffer zones is a requirement imposed upon local authorities by national policy and therefore will be undertaken and mapped in the Deposit Plan.</p> <p>The text promotes the use of recycled and secondary sources of aggregate in accordance with PPW.</p>	<p>The updated Regional Technical Statement and BGS report will form key background evidence to inform the development of detailed policies and allocations in the Deposit LDP.</p>
<b>Comments on Housing Needs and Supply</b>			

<b>1115</b> <b>1355</b>	Affordable rather than executive homes should be built. Demand for affordable housing must be considered.	The delivery of affordable housing to meet local needs is a key priority for the replacement LDP. Affordable housing is restricted to households with a local connection and is secured as affordable in perpetuity.	No change proposed
<b>1390</b>	Identified housing land supply is not robust and trajectory is required to identify supply.	Detailed housing trajectory will be embedded in Deposit LDP. The Housing Land Supply Assessment in Appendix 2 states that the figures were indicative and would be refined as the LDP progressed. The situation regarding completions and sites with permissions will change monthly and will be updated periodically to reflect the latest position.	Deposit LDP will include detailed housing trajectory.  The Housing Land Supply Assessment will be updated and will inform site allocations in the Deposit LDP.
<b>935</b> <b>1355</b>	Any new property would be purchased by outsiders and would be detrimental. Should not provide housing for those who work in the areas of Chester, Wrexham, Liverpool and Manchester.	Comment noted.	No change proposed.
<b>103</b>	Land owners can't provide 100% affordable housing- this is not viable.	There is no local policy requirement to provide 100% affordable housing on every development site.	No change proposed.
<b>823</b>	Is there a difference between housing and residential development?	No, they mean the same thing.	No change proposed.
<b>862</b>	Candidate sites exceed identified housing need and would be detrimental to the natural and protected environment. Already sufficient provision for Llanbedr DC.	The LDP aims to meet local housing need. The candidate sites register shows all land that landowners have asked to be considered for inclusion in the new LDP. There are currently no proposed allocations and only a small number of the sites submitted will be required. These will	No change proposed.

		be included in the Deposit LDP and consulted upon. The candidate sites will be assessed in terms of their suitability, including impact on the AONB and the need for development.	
<b>970</b>	Too much change to the number of houses in Llangollen would damage community cohesion.	Comments noted.	No change proposed.
<b>Former North Wales Hospital site</b>			
<b>276</b>	North Wales hospital site should be a priority development site in Denbigh.	Development proposals and detailed policies for the former North Wales Hospital, Denbigh will be consulted upon at the Deposit LDP stage.	Will inform development of detailed policies to be consulted upon as part of the Deposit LDP.
<b>Delivery and Implementation</b>			
<b>369</b>	Evidence must be provided to demonstrate delivery of the plan and allocated sites. Must include a viability assessment, details of costings, timings, phasing, an infrastructure plan and housing trajectory with analysis of existing allocations, key candidate sites, land bank, windfall or small sites which will underpin future supply.	<p>Evidence on delivery, viability and detailed analysis of housing supply will underpin the development of policies and site allocations in the Deposit LDP.</p> <p>Detailed housing trajectory will be embedded in Deposit LDP.</p> <p>An Infrastructure Plan will be prepared to accompany the Deposit LDP.</p>	<p>Evidence on delivery, viability and detailed analysis of housing supply will underpin the development of policies and site allocations in the Deposit LDP.</p> <p>Deposit LDP will include detailed housing trajectory</p> <p>An Infrastructure Plan will be prepared to accompany the Deposit LDP.</p>
<b>0</b>	Community Infrastructure Levy and policy required. Not acceptable for developers and landowners to claim viability issues when land prices are too high.	There are currently no plans to introduce a Community Infrastructure Levy charging policy in Denbighshire. The Council continues with Section 106 agreements etc. All candidate sites are assessed with	No change proposed.



		regard to viability and deliverability before being considered for inclusion in the next LDP.	
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### **Appendix - Procedural requirements and the tests of soundness: key questions and evidence**

Section 64 (5) of the Planning and Compulsory Purchase Act identifies two purposes of an independent examination. The first is to ensure that the LDP or plan revisions have been prepared in accordance with **procedural requirements**; and the second is to determine whether the plan is '**sound**'.

#### ***Procedural requirements***

To ensure that time is not spent examining in detail a plan that is very clearly procedurally unsound, the Inspectorate will carry out an early screening of every submitted LDP (or proposed plan revisions) to ensure that:

- It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme (CIS).
- The plan and its policies have been subjected to sustainability appraisal, including strategic environmental assessment.
- An Appropriate Assessment has been carried out under the Habitat Regulations 1994.

The LPA must submit a Consultation Report, a Sustainability Appraisal Report and a Habitats Regulations Assessment Report to demonstrate that it has complied with procedural requirements (for more information see 'Preparing for submission: guidance for Local Planning Authorities').

#### ***Soundness tests***

Section 8.2.1.2 of the [LDP Manual \(2015\)](#) contains three 'tests of soundness' which underpin LDP examinations, and identifies key questions in relation to each test. Suggested evidence requirements in relation to each soundness test are identified below.

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

A range of documents may be relevant, particularly the policy documents with land use implications produced by other organisations. It would not be appropriate for the LDP to list all the strategies and documents taken into account in its preparation. These can be part of a background/topic paper used by the LPA to demonstrate that this test of soundness is met.

The LPA should:

- Explain how strategic policies and allocations are consistent with national policy, the Wales Spatial Plan, well-being goals and the Welsh National Marine Plan
- Avoid wasteful/unnecessary repetition of national development management policies, explaining and justifying why local development management policies are required
- Explain how the plan adequately takes account of the requirements of other public and private sector organisations/departments, such as those of transport bodies, utility companies and agencies providing services in the area, including their future plans and any requirement for land and premises

- Explain how the plan relates to the Single Integrated Plan or the National Park Management Plan, identifying policies and proposals which deliver key components of that strategy which relate to the use and development of land
- Demonstrate how the plan is consistent with those of neighbouring LPAs.

Representations from bodies that consider the LDP either does or does not have sufficient regard to other relevant strategies for which they are responsible will be significant. The SA report and SEA must provide justification for a departure from national policy. Inspectors will, based on the relevant evidence, determine the weight that should be given to representations from bodies that are responsible for other relevant strategies that have been taken into account in the LDP.

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

To assess this test a range of locally-specific evidence will need to be provided. The evidence should clearly support the plan's strategy and policies. Local evidence must be proportionate, robust and credible and prepared in accordance with national planning policy and good practice guidance.

The Sustainability Appraisal Report is a fundamental part of the evidence base. The report should set out the options and the process by which they have been objectively assessed. The report should explain how the LPA considered reasonable and credible alternatives when preparing the plan. LPAs will not be expected to deal with every possible alternative or option but they will be expected to consider those put to them during the process of preparation and engagement. Where a balance has been struck in taking decisions between competing alternatives, it should be clear how those decisions were taken.

A typical evidence base for an LDP may include the following (suggested examples only):

- Procedural evidence:
  - Sustainability Appraisal Report (incorporating SEA, Candidate / Alternative Sites assessment, and Welsh language assessment).
  - Habitats Regulations Assessment: the report should set out the results of the appraisal process of the LDP as required by the Habitats Regulations and as explained in TAN 5, Nature Conservation and Planning (particularly Annex 6).
  - The Consultation Report
  - The Review Report (for plan revision or replacement).
- Spatial strategy evidence:
  - Settlement hierarchy and boundary assessment
  - Green Belt / green wedge study.
  - Housing (or urban) capacity study
- Land use needs evidence:
  - Housing Needs Assessment
  - Local Housing Market Assessment (including Gypsy and Traveller sites)
  - Joint Housing Land Availability Study / housing trajectory
  - Employment Land Assessment
  - Retail needs/capacity assessment
  - Infrastructure Assessment/Plan
  - Transport Assessment(s)
  - Open Space and Recreation Assessment.
- Environmental capacity evidence:
  - Strategic Flood Consequence Assessments

- Agricultural land quality
- Biodiversity / nature conservation assessment
- Landscape Character Assessment
- Heritage/archaeological surveys
- Renewable energy assessment
- Minerals / geological studies
- Waste studies.
- Deliverability evidence:
  - Viability study (affordable housing, etc)
  - Site promoter/infrastructure provider statements, etc
  - Risk assessments / sensitivity testing analyses.

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

The evidence will be broadly similar to that required to assess test 2. In relation to site allocations or alternative sites, however, additional evidence may include site-specific reports or information provided by public and private sector delivery bodies, relevant infrastructure providers or site promoters, on practical deliverability issues/matters. Viability evidence should demonstrate that proposals (particularly allocations) are likely to be delivered as anticipated.

Evidence which assesses risks to delivery can be useful in justifying appropriate contingency provisions (e.g. the 'flexibility allowance' built into the housing target). Sensitivity testing of the LDP's policies or proposals can also identify other risks to non-delivery. For example, if the strategy is dependent on the construction of a by-pass, the LPA should carry out an assessment of the risk of that piece of infrastructure not being delivered and the consequences of this failure for the plan as a whole.

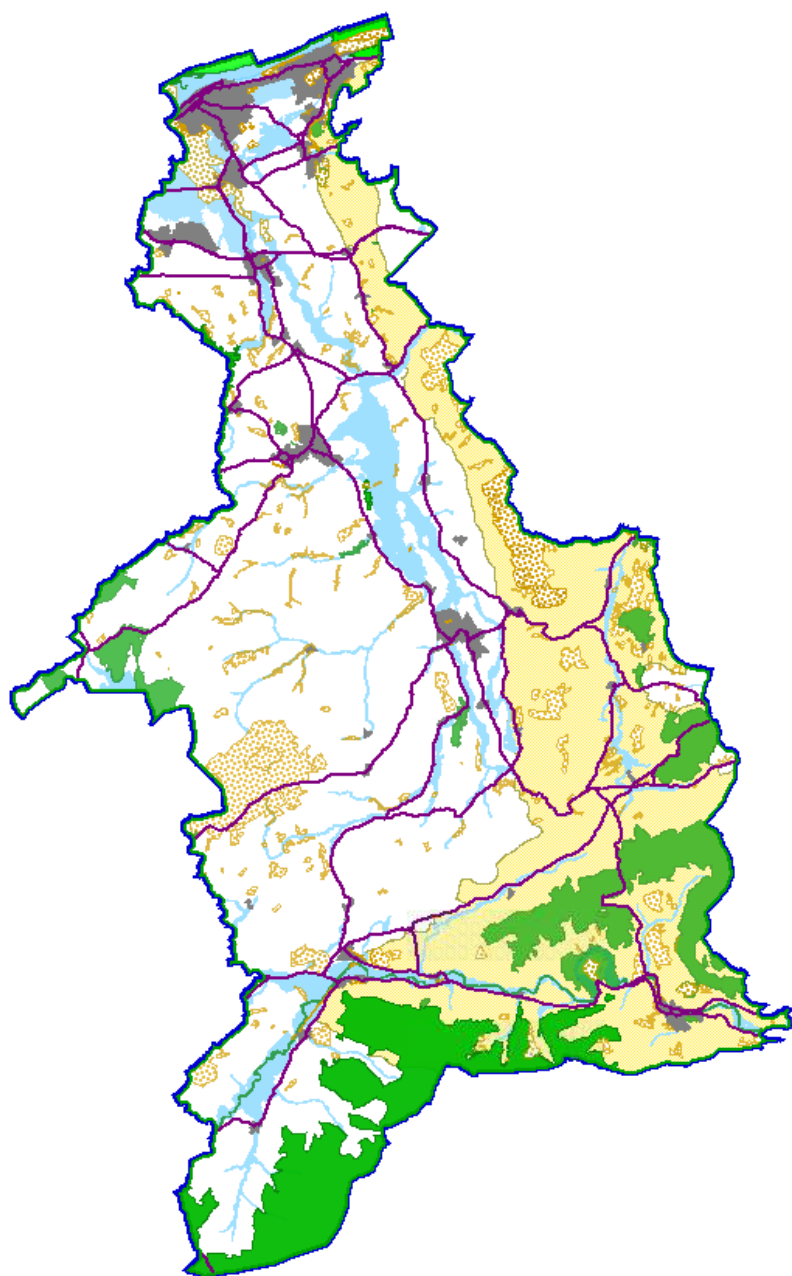
Background papers may need to elaborate on the delivery mechanisms and timescales for implementation which relate to the targets and milestones contained in the plan's monitoring framework. It should be clear how indicators and targets are to be measured. Triggers for plan review should be clearly identified.

Finally, for a plan to be effective, development management policies must provide a robust, clear and consistent framework for considering planning applications.

# Denbighshire Local Development Plan 2018 - 2033

## Updated Sustainability Assessment of the Replacement LDP

February  
2023



## **Non-Technical Summary**

1. This non-technical summary of the Updated Sustainability Assessment of the Replacement LDP provides an overview of the background and findings of this Report.

### **Background**

2. Denbighshire County Council is preparing its Local Development Plan 2018 to 2033 (Replacement LDP). The Replacement LDP will allocate land for development to meet Denbighshire's needs, this includes Denbighshire's need for housing and employment opportunities, to 2033. To allocate this land, there is a growth strategy setting out how much development growth there should be in Denbighshire and a spatial strategy, indicating where that development should go in Denbighshire. These strategies are delivered through policies which are then used to make decisions on planning applications. The strategies and policies are tools to deliver the objectives and vision for development in Denbighshire.
3. The initial phase in preparing the Replacement LDP, Pre-Deposit Plan, included a document, The Draft Preferred Strategy. It set out the vision, objectives, growth and spatial strategy as well as key objectives. It was prepared in 2019 and underwent consultation in the summer of 2019. Since the consultation the social and economic position in Wales and the UK has changed with the event of Brexit and the Covid pandemic. These factors have been taken into account, together with the comments from the consultation which has resulted in the recommendations to change The Draft Preferred Strategy at the next stage of preparing the Replacement LDP. The recommended changes will be delivered in the Deposit Plan but must be assessed now in terms of sustainability.

## **Recommended Changes and Sustainability Assessment**

4. This Report assess the sustainability of those recommended changes to the Replacement LDP vision, growth and spatial strategy as well as key policies. All the proposed changes are positive in terms of sustainability and are supported in this Report.

### **Vision**

*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 enhanced and protected. 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.*

5. A recommended change to the vision is to include reference to climate change. This is a positive step in terms of sustainability and this report recommends that the wording also refer to climate change that seeks to reduce resource consumption so that finite resources are protected for future generations.

### **Objectives**

6. The Initial Sustainability Appraisal 2019 recommended that the LDP Objective 5 be amended to “Supporting the provision, operation and sustainable development of infrastructure and services.” This continues to be a positive step in terms of sustainability.
7. It is recommended that Objective 8 (“Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change”) include reference to mitigation; reducing carbon emissions; renewable energy and Active Travel. This makes the objective even more sustainable and positive. It further significantly supports human health, healthier communities and communities that are resilient to climate change.

## **Overall level of growth**

8. Following consultation on the Draft Preferred Strategy it has been recommended that the growth strategy be amended to reduce the amount of employment land needed and increase the affordable housing provision:

**The Preferred Strategy will make provision for a level of growth comprising 41 ha of employment land to accommodate a forecasted land requirement of 31 ha. This will be supported by land for 3,775 new homes to meet a housing requirement of 3,275 dwellings.**

**There will be an increase to the provision of affordable housing across the plan period.**

9. The recommended amendments to the Preferred Growth Option are positive. In the medium to long term, they significantly increase the ability for everyone to live in homes that meet their needs and will significantly help to strengthen the local economy and prosperity of towns and rural centres. The growth strategy has been updated to reflect the current economic position and will make it more sustainable.

## **Spatial distribution of growth**

10. Where the growth is distributed has had to be changed as the Bodelwyddan strategic site will not be delivered by 2033. The key strategic site has been removed from the spatial strategy and it has been updated to limit growth in unserviced settlements so that the growth is only for local need. There is now a requirement that all development consider climate change and only be allowed where it does not damage the natural environment.
11. The recommended wording of the Spatial Strategy is:

**Having regard to Placemaking and the principles of sustainable development, which include consideration of available infrastructure, the Spatial Strategy will focus development in the top three tiers of the**



**settlement hierarchy (main centres; local centres, and villages) with limited growth in un-serviced settlements that focusses on meeting local needs. Development shall be resilient to the effects of climate change and be delivered within the means of the natural environment.**

12. The recommended changes to the Spatial Strategy are extremely positive and sustainable in the short, medium and long term. Allowing appropriate and small levels of growth where there is a local need allows communities to survive without overburdening them. The requirement for development to be resilient to the effect of climate change will control such development and improve the resilience of communities to climate change. The requirement to deliver development within the means of the natural environment and be resilient to the effects of climate change should also ensure that finite resources are utilised responsibly.

### **Key Policies**

13. The recommendations suggest amendments to four of the key policies, Strategic Policy (SP) 1: Placemaking, SP 4: Affordable Housing, SP 8: Infrastructure and SP 9: Visitor economy. There is also a recommendation is to delete SP 7: Bodelwyddan strategic site.
14. SP 1 is to be amended so that it includes key policies relating to climate change, reducing carbon emissions and renewable energy. This will significantly help in creating healthier communities, for example by improving air quality and in encouraging the responsible use of infinite resources. It will also help protect and improve green and blue infrastructure, the environment and landscape as well as supporting the use of active travel and new forms of employment.
15. SP 4 will have an increased affordable housing target that reflects the results of the latest Local Housing Market Assessment. This significantly helps in delivering homes that are suitable for everyone and meet the needs of the communities which will create healthier communities.

16. SP 8 will include reference to water management infrastructure which supports providing suitable homes, healthier communities that are resilient to the effects of climate change and green and blue infrastructure. It also helps to ensure finite resources; the environment and the landscape are used responsibly and in a sustainable manner.
17. SP 9 will include “conserve and enhance the county’s natural and built environment”. This helps in providing blue and green infrastructure, maintaining the landscape as well as the cultural and historic built environment and it supports a diverse environment.
18. Deleting SP 7 Bodelwyddan strategic site policy is needed as the site cannot be delivered by 2033. Including a policy in the Replacement LDP that cannot be used or achieved is a very negative step and so it is sensible to delete it.
19. The overall SA assessment was reviewed in light of the removal of SP 7 and the policies are sustainable overall, the outcome remains positive and has been strengthened with the amendments.

## **Conclusion**

20. In conclusion the recommended changes to the vision, objectives, growth and spatial strategy as well as the key policies have made the Replacement LDP more positive in terms of sustainability and therefore more sustainable. The sustainability assessment supports the recommended changes.

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## **I. Introduction**

- 1.1 In preparing its Local Development Plan (Replacement LDP) for 2018 - 2033 Denbighshire County Council has completed the initial stage in the Replacement LDP preparation, the Pre-Deposit Plan and this was consulted on in the summer of 2019.
- 1.2 Following that consultation, The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 requires Denbighshire County Council to prepare an Initial Consultation Report that makes recommendations on the Preferred Strategy and how to take it forward to the next stage in preparing the Replacement LDP, the Deposit Plan.
- 1.3 The Initial Sustainability Appraisal (SA) Report 2019 was consulted on as part of that Pre-Deposit Plan consultation. The comments and recommendations made on the Initial SA Report 2019 primarily related to updating baseline evidence and will be taken into account when the SA Report is prepared to accompany the Deposit Plan.
- 1.4 The key document of the Pre-Deposit Plan is the Preferred Strategy, and it is the comments and recommendations made on the Preferred Strategy that this Report assesses.
- 1.5 This Sustainability Assessment Report assesses whether the amendments to the Preferred Strategy, recommended in the Initial Consultation Report, are sustainable. This Report will recommend whether the amendments should be taken forward, on the single basis of being sustainable, into the Deposit Plan.

### **Methodology**

- 1.6 The Sustainability Appraisal (SA) is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan, will achieve the social, environmental, and economic objectives. These social, environmental, and economic objectives define sustainable development.
- 1.7 A consistent method is required for comparing and contrasting, analysing, and describing, the impacts of the SA objectives against

Replacement LDP options, policies, proposals and objectives. This method is achieved by utilising an objective-led SA framework.

- 1.8 The same SA framework as set out in the Initial SA Report 2019, see Appendix A, has been used for the purposes of this Report.
- 1.9 The assessment of predicting and evaluating the impact of policies on sustainable objectives is assessed using a seven-point scale that indicates the significance of the effects from very positive to very negative. The SA Assessment Matrix is unchanged and is attached at Appendix B.

#### **Baseline Data**

- 1.10 The baseline data is used in conjunction with the Sustainability Appraisal (SA) objectives to predict accurately how the Replacement LDP policies will affect the environment, and social and economic factors.
- 1.11 Save for where it is explicitly stated, in the assessment, the baseline data has not been altered or updated from the 2019 Initial SA Report. The baseline data will be updated for the SA Report that will assess the Deposit Plan.

## II. Assessment of the Replacement LDP Vision

- 2.1 The LDP Vision set out in the Draft Preferred Strategy was: -

*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 enhanced and protected. 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.*

- 2.2 Following consultation on the Draft Preferred Strategy it has been recommended that the LDP Vision be amended to include reference to climate change in the Deposit Plan. Wording for the change has not been finalised.

**Recommendation –**

**That the LDP Vision be amended to include a reference to climate change in the Deposit Plan.**

- 2.3 The role of the LDP Vision is to define the main purpose on the Replacement LDP and provide a framework for the Draft 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.
- 2.4 The Vision overall positively assists in delivering the SA Objectives as can be seen in Table 2.1. The inclusion of a reference to climate change will increase the positive impact of SA 3: everyone lives in homes that meet their needs, SA 4: local communities are well served by public transport and provided with multiple opportunities to engage in active travel, SA 9: the environment is diverse, attractive and facilitates the wellbeing of all living organisms and SA 12: Local communities are resilient to the effects of climate change, including an increased risk of flooding. If appropriately worded, a reference to climate change that

seeks to reduce resource consumption, could also have a positive impact on the use of finite resources (SA 8).

*Table 2.1: Recommended Amended Replacement LDP Vision compared with SA Objectives*

<b>SA Objectives</b>		<b>RLDP Vision</b>
<b>SA 1:</b> Everyone lives in homes that meet their needs.	+	<i>The housing and employment needs of the County will be met.</i>
<b>SA 2:</b> Communities are healthier.	+	<i>Life of a high quality will be maintained for all communities</i>
<b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.	+	<i>Life of a high quality will be maintained for all communities. The high quality environment will be enhanced and protected.</i> <i>Reference to climate change will further support SA 3.</i>
<b>SA 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.	+	<i>Life of a high quality will be maintained for all communities. The housing and employment needs of the County will be met.</i> <i>Reference to climate change will further support SA 4.</i>
<b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.	+	<i>We have a strong Welsh language</i>
<b>SA 6:</b> There is a strong local economy and successful regeneration.	+	<i>Will have a vibrant urban coast, with thriving market towns and rural areas.</i> <i>The housing and employment needs of the County will be met.</i>
<b>SA 7:</b> Denbighshire's town and rural centres are not in decline.	+	<i>Will have a vibrant urban coast, with thriving market towns and rural areas.</i>
<b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.	+	Unknown and will depend on RLDP objectives and policies. <i>Reference to climate change if worded correctly to ensure a reduction in resource consumption will support SA 8.</i>



<b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.	+	<i>The high quality environment will be enhanced and protected. Reference to climate change will further support SA 9.</i>
<b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.	+	<i>The high quality environment will be enhanced and protected. We have a strong Welsh language and culture.</i>
<b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.	+	<i>The high quality environment will be enhanced and protected. We have a strong Welsh language and culture.</i>
<b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.	+	<i>Life of a high quality will be maintained for all communities. The high quality environment will be enhanced and protected. Reference to climate change will further support SA 12.</i>

2.5 It is recommended that:

**SA Recommendation –**

**That LDP Vision be amended to:**

**Include climate change with reference to responsibly using finite resources.**

### III. Assessment of the Replacement LDP Objectives

- 3.1 Following consultation on the Draft Preferred Strategy it has been recommended that the strategic objectives be amended:

**Recommendation -**

**That LDP Objective 8 be amended to include a reference to mitigation; reducing carbon emissions; renewable energy and Active Travel in the Deposit Plan.**

- 3.2 The Initial Sustainability Appraisal 2019 recommended that LDP Objective 5 be amended to include ‘sustainable’:

**SA Recommendation – That LDP Objective 5 be amended to:**

**“Supporting the provision, operation and sustainable development of infrastructure and services.”**

- 3.3 The recommended amendments to the Replacement LDP (RLDP) Objective 8 have been re-assessed against the SA framework and displayed utilising the SA assessment matrix. The findings can be seen in Table 3.1 and 3.2 below.

*Table 3.1: Recommended Amended Replacement LDP Objectives compared to SA Objectives.*

RLDP Objectives		Commentary
RLDP 1	Allocating sufficient land in accordance with a sustainable settlement strategy to meet the projected market and affordable housing needs of Denbighshire.	<ul style="list-style-type: none"> <li>• Significantly supports the creation of homes that meet the needs of residents (SA 1), encourages social inclusion and improves human health (SA 2). Sufficient availability of affordable housing should enable younger people to remain in Denbighshire and will discourage the conversion of employment land into residential land (SA 6). Locating development in a sustainable manner should support town and rural centres (SA 7) and assist in reducing flood risk (SA 12).</li> <li>• Implementation will determine how it impacts on green and blue infrastructure, open space (SA 3), public transport services and active travel opportunities (SA 4), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> <li>• There is no clear trend as to how development impacts on the Welsh language; in some location's development hinders it whilst in other locations it helps increase the number of Welsh speakers (SA 5).</li> </ul>

RLDP 2	Supporting and enhancing the Welsh Language	<ul style="list-style-type: none"> <li>• It significantly helps in increasing the number of Welsh speakers (SA 5) and helps in retaining Denbighshire's cultural landscape, environment, features and sites (SA 10 &amp; 11).</li> <li>• This supports the locality although it could deter national and international aspirations. It could help or hinder creating or improving homes (SA 1) or green and blue infrastructure (SA 3), locating settlements so that they are well served by public transport (SA 4), creating job opportunities and attracting investment for development or regeneration in town and rural centres (SA 6 &amp; SA 7).</li> <li>• In respect of social aspects, it could also help or hinder social inclusion which is associated with SA 3 and SA 12.</li> <li>• There is no link to finite resources (SA 8) or the environment (SA 9).</li> </ul>
RLDP 3	Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.	<ul style="list-style-type: none"> <li>• Significantly supports having high quality green and blue infrastructure (SA 3), providing opportunities for active travel (SA 4), retaining peat, minerals, soil (SA 8), creating a diverse environment (SA 9) and reducing the impact of CO<sub>2</sub> emissions and climate change (SA 12).</li> <li>• Helps in achieving healthier homes (SA 1), healthier and resilient communities with opportunities for walking and cycling (SA 2). It helps in creating job opportunities in the energy sector (SA 6) and improving rural access to services (SA 7).</li> <li>• It will be dependent on implementation as to how it impacts the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> <li>• There is no link to Welsh speakers (SA 5).</li> </ul>
RLDP 4	Protecting and enhancing Denbighshire's natural, built and historic environment.	<ul style="list-style-type: none"> <li>• Significantly supports a diverse environment (SA 9), the landscape (SA 10) the culturally important and historic built environment (SA 11).</li> <li>• It helps in achieving healthier communities (SA 2), high quality green and blue infrastructure (SA 3), reduced land contamination and responsible use of finite resources (SA 8).</li> <li>• It will be dependent on implementation as to how it impacts on delivering homes (SA 1), local community services (SA 4), the local economy (SA 6), town and rural centres and the resilience to climate change.</li> <li>• There is no link to Welsh speakers (SA 5).</li> </ul>
RLDP 5	Supporting the provision, operation and development of infrastructure and services.	<ul style="list-style-type: none"> <li>• Significantly helps in delivering well serviced communities (SA 4), a strong local economy (SA 6), town and rural centres (SA 7)</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2).</li> <li>• Implementation will impact on whether it delivers high quality green and blue infrastructure (SA 3), services that contribute to increasing the number of Welsh speakers (SA 5) or reduces the risks of climate change (SA 12). Implementation will control how finite resources are utilised (SA 8), whether there is a positive or negative impact on the environment (SA 9), the landscape (SA</li> </ul>

		<p>10), the culturally important and historic built environment (SA 11).</p> <p><b>a. Suggest inserting the word 'sustainable' before development so that the implementation is undertaken in a positive manner.</b></p>
RLDP 6	Supporting a healthy economy including proposals for strategic growth, key economic sectors and the rural economy.	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Helps create healthier communities (SA 2) and serviced communities (SA 4)</li> <li>• Implementation will need to be carefully considered. This applies to high quality green and blue infrastructure (SA 3), the impact on finite resources (SA 8), the environment (SA 9) and landscape (SA 10), the culturally important and historic built environment (SA 11) and climate change (SA 12).</li> <li>• It could help (by retaining Welsh speakers where they want to work) and hinder the number of Welsh speakers, depending on demands of investors and visitors (SA 5).</li> <li>• A healthy economy does help in achieving homes that meet everyone's needs (SA 1).</li> </ul>
RLDP 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.	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and successful regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Renewing the built environment and having designated employment premises helps deliver homes by ensuring that residential premises are not converted into employment premises (SA 1). Helps create opportunities for social inclusion and healthier communities (SA 2) where Welsh speakers will be retained and want to work (SA 5).</li> <li>• Implementation will determine the impact on high quality green and blue infrastructure (SA 3), transport services (SA 4) and finite resources (SA 8), the environment (SA 9), the landscape (SA 10), historic and cultural features (SA 11) and resilience to climate change (SA 12).</li> </ul>
RLDP 8	<p>Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.</p> <p><b>Recommendation: Include reference to mitigation, reducing carbon emissions; renewable energy and Active Travel.</b></p>	<ul style="list-style-type: none"> <li>• The recommendation further significantly supports human health, social inclusion, healthier communities (SA 2), communities that are resilient to climate change (SA 12) and well served communities (SA 4)</li> <li>• Helps deliver houses for everyone (SA 1), green and blue infrastructure and open space (SA 3), the environment (SA 9) and cohesive communities that contribute to increasing the number of Welsh speakers (SA 5) by being places where Welsh speakers want to live and improving town and rural centres (SA 7) as well as retaining culturally important and historic features (SA 11).</li> <li>• Implementation will determine the impact on the local economy and regeneration (SA 6), finite resources (SA 8) and landscape (SA 10).</li> </ul>

3.4 The assessment of the Replacement LDP objectives in terms of the SA assessment matrix can be seen in Table 3.2 below.

*Table 3.2: SA Assessment Matrix of Recommended Amended Replacement LDP Objectives*

Objectives	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	Over -all
RLDP 1	++	+	#	#	+ / -	+	+	#	#	#	#	+	+
RLDP 2	+ / -	+ / -	+ / -	+ / -	++	+ / -	+ / -	No link	No link	+	+	+ / -	+ / -
RLDP 3	+	+	++	++	No link	+	+	++	++	#	#	++	++
RLDP 4	#	+	+	#	No link	#	#	+	++	++	++	#	+
RLDP 5	+	+	#	++	#	++	++	#	#	#	#	#	#
RLDP 6	+	+	#	+	+ / -	++	++	#	#	#	#	#	#
RLDP 7	+	+	#	#	+	++	++	#	#	#	#	#	+
RLDP 8	+	++	+	++	+	#	+	#	+	#	+	++	++
Overall	+	+	+	+	+	+	+	#	#	#	#	+	+

3.5 The recommended change to Objective 8 makes it even more sustainable and positive. The change to Objective 8 is supported.

**SA Recommendations: –**

**LDP Objective 8 be amended to include a reference to mitigation; reducing carbon emissions; renewable energy and Active Travel**

## IV. Assessment of the Replacement LDP Preferred Growth Option

4.1 The Draft Preferred Strategy set out five projected growth options:

- **Option 1** is a 15 year population led migration trend based on Welsh Government 2017 population forecasts that provides for 160 dwellings per annum and approximately 750 jobs.
- **Option 2** is a 10 year population led migration trend based on Welsh Government 2017 forecasts that provides for 200 dwellings per annum and approximately 1,200 jobs.
- **Option 3** is a 15 year population led migration trend based on propensity methodology that provides for 300 dwellings per annum and approximately 2,750 jobs.
- **Option 4** is an employment led trend based on a forecast of labour demand proposed in the Employment Land Review that provides for 240 dwellings per annum and approximately 1,300 jobs.
- **Option 5** is an employment led trend based on past employment land take-up rates provided in the Employment Land Review that provides for 500 dwellings per annum and 6,800 jobs.

4.2 In order to sustainably assess the Replacement LDP growth options the Initial Sustainability Appraisal considered the figures of the adopted LDP and the 2019 trends as a baseline. It noted:

- a. Denbighshire has an aging population.
- b. There is a high dependency ratio of 722 dependents for every 1,000 working age people; expressed as 0.722.
- c. The adopted LDP provided for 7500 new dwellings over the plan period (15 years), 500 new dwellings per annum and 50 hectares of employment land. It provided for a 10% affordable housing contribution, 50 affordable homes per annum.

- d. Currently Denbighshire is not achieving the number of dwellings provided for in the adopted LDP and it was considered to be unrealistic that this is going to be achieved in the remaining plan period.
- e. The LHMA indicated that the average number of new dwellings created annually based on the past 10 year trend was 170, whilst based on the past 15 year trend it was 220.
- f. The most recent 5 year average number of new dwellings completed is 162.
- g. There are on average 56 new affordable homes created annually over the most recent 5 year period, which equates to 34.5% of the average annual number of dwellings completed (162).
- h. The LHMA indicates that there is a need for 155 affordable homes per annum to 2023 which equates to 96% of the average annual number of dwellings completed. This is not realistic nor is it deliverable. It has therefore not been utilised as a baseline figure to assess the sustainability of the growth options and is why an affordable housing projection was ruled out as an option for the draft Preferred Strategy.
- i. Household growth rates are higher than population growth rates.
- j. The LHMA also indicates that there is a need for smaller and more affordable homes in Denbighshire.
- k. There is net out-migration of 16 to 29 year olds.
- l. Decreasing working population.
- m. Reliance on public sector on employment.
- n. The recommended amount of employment land required to 2033 from the Employment Land and Economic Growth Assessment (ELEGA) is 47.60 hectares which will assist in providing a range of sites across the county and the opportunity to alter the aging demographic of the county. This allocation is achieved by the availability of 65.5 hectares of currently available employment land, plus an additional allocation of 3.1 hectares in Corwen.

4.3 The Initial Sustainability Appraisal found that overall growth **option 3** would have the most positive effect although it could have negative impact on communities' resilience to climate change and blue and green infrastructure. The most sustainable option in terms of housing provision would be one somewhere between **option 3** and **option 2 or 4**. It was noted that there was a need for a substantial amount of affordable housing and employment land. It recommended that the provision of employment land would be matched as stated in **option 5** and the Employment Land and Economic Growth Assessment, February 2019 (ELEGA, 2019) to limit net out-migration of 16 to 29 year olds and the dependency ratio.

4.4 The Draft Preferred Strategy recommended, in line with the Initial Sustainability Appraisal, that growth should be:

*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.*

4.5 In addition to the Preferred Growth Strategy an Affordable Housing policy included:

*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.*

4.6 Following consultation on the Draft Preferred Strategy it has been recommended that the growth strategy be amended:

**Recommendation –**



**The Preferred Strategy will make provision for a level of growth comprising 41 ha of employment land to accommodate a forecasted land requirement of 31 ha. This will be supported by land for 3,775 new homes to meet a housing requirement of 3,275 dwellings.**

**There will be an increase to the provision of affordable housing across the plan period.**

- 4.7 The change to the growth strategy in relation to employment growth is a result of a fundamental change to the economy since 2019 and considers the 2021 updated Employment Land and Economic Growth Assessment (ELEGA, 2021).
- 4.8 The trends and baseline data have changed from 2019 as set out in paragraph 4.2 above. Namely 4.2.m is not representative of the current economic position and is out of date.
- 4.9 Since 2019 the effects of a change in trading arrangements with the European Union have become evident and the Covid-19 pandemic had a significant economic impact. Covid 19 has impacted the production process and demand for individual goods, as well as a change to the location of the work force, a move away from office accommodation to home working and changes in places of production.
- 4.10 The initial preferred growth strategy was based on the ELEGA, 2019 which forecasted an annual need for 2.38 hectares of land whilst the updated ELEGA, 2021 projected an annual need of 1.92 hectares to 2033. The Local Development Plan 2006 to 2021 is monitored annually and the forecasted need of 1.92 hectares has not materialised since 2018. For that reason, the five- year buffer calculation is based on 0.4 hectares, which is the annual average figure of delivered employment land between 2018 and 2021. Updated evidence has accordingly resulted in a reduction in forecasted employment land from 47.6 hectares, as reflected in the draft Preferred Strategy (Consultation Version, May 2019) to 31.81 hectares as proposed in the draft Preferred Strategy (Amendments, 2023).

- 4.11 There has also been a change to employment sites that had planning permission and were considered as 'Committed sites'. Officers carried out a review of 'Committed sites' in October 2022. The planning permission for Bodelwyddan Key Strategic Site included the provision of 26 hectares of employment land. The planning permission has expired. Considering the current position, as of January / February 2023, there is no indication that an alternative employment site, of equal size, will be available or suitable to be included in the Replacement LDP. Review and annual monitoring have also shown the loss of, allocated but undeveloped, employment land to alternative uses, for example retail. While an over-supply of employment land signals ambition to the market, it also raises the risk of losing land to alternative uses in unsustainable locations. In summary, the review of 'Committed sites' identified 31.49 hectares of land; excluding 14.67 hectares of land at 'Green Gates Farm', which will be part of the Council's nature reserve project.
- 4.12 In order to facilitate the SA assessment of the Preferred Strategy Growth Option Table 4.1 assesses information from the Growth Level Options Report 2019. It also includes some additional baseline information explained above to provide a clearer indication of the impacts of each option.

*Table 4.1: Growth Option Information Table incorporating Growth Level Options Report 2019*

<b>Impact indicator Projections</b>	<b>Totals 2018</b>	<b>Recommended Preferred Strategy Growth Levels</b>
<b>Households</b>	41,700	3,100
<i>Households % increase on 2018</i>		+7.4%
<b>Total dwelling requirement</b>	-	3,775
<b>Annual dwelling requirement</b>	-	250
<i>LHMA 15 year annual dwelling trend comparison</i>	220	+30
<b>Current trend (CT)- Comparison with 5 year annual average trend</b>	162	+88

<b>Affordable housing provision potential (AHPP) per year</b> (10% of total requirement)	-	25-30
<i>Comparison with 5 year annual average trend (34.5% of CT) and highest AHPP</i>	56	-26
20% annual affordable housing provision (AHP)	-	50
<i>20% AHP comparison with 5 year annual average trend</i>	56	-6
<b>Income in local economy</b>	-	Increase
<b>Business impact</b>	-	Positive
<b>Employment land requirement for jobs growth (ha)</b>	-	41 ha

4.13 Additionally an increase to the affordable housing provision in the preferred strategy, as supported by the most up to date Local Housing Market Assessment, also needs to be built into the SA assessment.

4.14 Considering the SA objectives commentary on the sustainability of the recommended Preferred Strategy Preferred Growth Option is provided in Table 4.2 below.

*Table 4.2: Replacement LDP Recommended Amended Preferred Growth Option compared to SA Objectives.*

Option	Commentary
<b>Preferred Growth</b>	<ul style="list-style-type: none"> <li>•Helps in delivering homes that meet everyone's needs (SA 1) in that it delivers 30 more homes than the LHMA 15 year annual trend and is just below (50 affordable homes per annum) but in line with the current affordable housing trend (56 affordable homes per annum) when a 20% provision is utilised. Increasing the affordable housing provision will significantly assist in delivering suitable homes. The positive impact will increase over the medium and long term.</li> <li>•This will have a positive impact on human health, allowing for suitable homes that are affordable and encouraging the expansion of high quality settlements and contribute to social inclusion (SA 2).</li> <li>• This will have a positive impact on local communities and climate change (SA 4 and SA 12) as the number of new dwellings is not significant and can maintain the current infrastructure and encourage sustainable transport options as well as social inclusion and community cohesion. This level of housing does not negatively impact on high quality agricultural land, flood zone areas or natural beauty spots and habitats. The dwellings or employment development if not implemented carefully with a view to climate change impact, or in the sustainable locations, could have a negative impact on air quality and put pressure on the transport infrastructure, although this level of development can be</li> </ul>

	<p>implemented taking into account climate change considerations. The positive impact on community cohesion will increase over the medium and long term.</p> <ul style="list-style-type: none"> <li>•There is no clear trend as to how development impacts on the Welsh language; in some locations development hinders it whilst in other locations it helps increase the number of Welsh speakers (SA 5).</li> <li>•Helps in delivering a strong local economy (SA 6) as it increases the labour force, working age population and allows for some employment land which will also assist in ensuring town and rural centres are regenerated (SA 7). The positive impact will increase over the medium and long term.</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3) finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the historic and cultural features (SA 11).</li> </ul>
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4.15 The assessment of the Replacement LDP recommended preferred growth option in terms of the SA assessment matrix can be seen in Table 4.3 below.

*Table 4.3: SA Assessment Matrix of the Recommended Amended Replacement LDP Preferred Growth Option*

Preferred Growth Option Timescales	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
Short 0 – 5 years	+	+	#	+	+ / -	+	+	#	#	#	#	+
Medium 6 – 10 years	++	+	#	++	+ / -	++	++	#	#	#	#	+
Long 11-20 years	++	+	#	++	+ / -	++	++	#	#	#	#	+

4.16 The recommended amendments to the Preferred Growth Option are overall positive and have combined the original options based on updated employment evidence and a higher affordable housing requirement to achieve a sustainable growth option.

## V. Assessment of the Replacement LDP Preferred Spatial Option

5.1 The Preferred Spatial Option has changed since 2019. Namely the Bodelwyddan Key Strategic Site has been removed as the planning permission, as well as agreements between site promoter and landowner have lapsed. The cost of installing a new sewer was a barrier to bringing the site forward and Ambition North Wales reviewed the project and considered it would exceed the available budget and could not be supported at a meeting on 30<sup>th</sup> September 2022. The site is therefore not deliverable and will not be delivered by 2033. It can no longer be included in the Replacement LDP.

5.2 The Draft Preferred Spatial Strategy in 2019 was:

*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 unserviced settlements (infill & small sites within development boundaries), focussed on meeting local needs.*

5.3 It is recommended that the Preferred Spatial Strategy be changed to:

### **Recommendation –**

**Having regard to Placemaking and the principles of sustainable development, which include consideration of available infrastructure, the Spatial Strategy will focus development in the top three tiers of the settlement hierarchy (main centres; local centres, and villages) with limited growth in un-serviced settlements that focusses on meeting local needs. Development shall be resilient to the effects of climate change and be delivered within the means of the natural environment.**

5.4 The assessment of the Recommended Preferred Spatial Strategy is set out in Table 5.1 below: -

Table 5.1: SA Assessment Matrix and commentary on Recommended Amended Replacement LDP Preferred Spatial Strategy

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Serviced settlements with limited (local need) growth in un-serviced settlements.</b>	Short 0 – 5 years	+	+	+	+	+ / -	+	+	+	+	+	#	+
	Medium 6 – 10 years	+	+	+	+	+ / -	+	+	+	+	+	#	+
	Long 11 – 20 years	+	+	+	+	+ / -	+	+	+	+	+	#	+
<b>Commentary</b>	Distributing incremental growth to serviced settlements in accordance with the settlement hierarchy and allowing some growth in unserviced settlements where there is a local need would generally be sustainable and have positive effects. It will provide growth where needed and not overburden communities, infrastructure or the natural environment and allow flexibility so that communities, towns and rural centres can be sustained and appropriately expand. It is unclear how development impacts the Welsh language, and this is also likely to be both positive and negative. It is also likely to encourage growth where most of the population is situated, in the north of the county such as in Rhyl or Prestatyn, which in the long term could have increased pressure to develop in flood risk areas but the requirement for development to be resilient to the effect of climate change will control such development and improve the resilience of communities to climate change. The requirement to deliver development within the means of the natural environment and be resilient to the effects of climate change should also ensure that finite resources are utilised responsibly. The implementation will determine the impact on the historic and cultural built environment.												

5.5 The Recommended Preferred Spatial Strategy is extremely positive and sustainable. This assessment supports the recommended changes.

## VI. Assessment of the Key Strategic Policies of the Replacement LDP

- 6.1 Key Strategic Policies are intended to deliver the Replacement LDP Vision and Objectives. They are high level policies, and more detail will be delivered later when the Replacement LDP is at Deposit stage. Following consultation on the Draft Preferred Strategy recommendations have been made to amend five of the Key Strategic Policies (SP) in the Deposit Plan.
- 6.2 Overall the Key Strategic Policies are sustainable and help in achieving sustainability in the Replacement LDP. The assessment of the five recommended changes against the SA framework is provided under the heading commentary in Table 6.1 below.

*Table 6.1 Replacement LDP Recommended Amended Key Strategic Policies compared to SA Objectives.*

Strategic Policy		Commentary
SP 1	<p><b>Placemaking</b></p> <p>All proposals must support the delivery of economic, social, environmental and cultural well-being, and demonstrate the following:</p> <ul style="list-style-type: none"> <li>• Resource efficiency</li> <li>• Promotion of health and well-being</li> <li>• Maintenance and enhancement of the natural environment</li> <li>• Equality of access</li> <li>• Access to services and facilities</li> <li>• Support and enhancement of the Welsh language</li> <li>• Resilience to the impacts of climate change</li> <li>• Promote decarbonisation and renewable energy technology</li> <li>• High quality design that respects local character and distinctiveness.</li> </ul>	<ul style="list-style-type: none"> <li>• SA 2 and SA 12 are significantly helped by requiring development to promote health and well-being, enhance the natural environment, provide quality access, consider resilience to climate change and be of a high quality design. SA 5 is significantly helped in enhancing the Welsh language.</li> <li>• High quality design supports the creating of homes that are healthier (SA 1). SA 3 and SA 4 are assisted by maintaining and enhancing the natural environment, providing equality of access and resilience to the impacts of climate change. It helps in achieving a strong local economy (SA 6), maintaining town and rural centres (SA 7) by requiring development to support the economy, provide good access and be of a high quality design. It helps to ensure finite resources are utilised responsibly (SA 8), that the environment is diverse (SA 9), the landscape (SA 10) and built heritage (SA 11) is maintained by requiring consideration of environmental and cultural well-being as well as resource efficiency, the natural environment, climate change, decarbonisation and respecting local character and distinctiveness.</li> </ul> <p><b>Commentary on proposed amendments:</b></p>

	<p><b>Proposed amendments:</b></p> <p>Amend to include key policies relating to climate change, reducing carbon emissions and renewable energy.</p>	<p>The proposed amendments are positive:</p> <p>SA 2 - they add to the significant positive impact for creating healthier communities such as in improving air quality.</p> <p>SA 3 – they support opportunities for improving and protecting green and blue infrastructure.</p> <p>SA 4 – they support enabling active travel.</p> <p>SA 6 - the support encouraging new forms of employment.</p> <p>SA 8 – they will support responsible use of finite resources.</p> <p>SA 9 and SA 10– they will help improve the environment and landscape and limit their deterioration.</p> <p>SA 12 – they add to the significant positive impact for creating local communities that are resilient to the effects of climate change.</p> <p>(No change to SA Assessment Matrix at Table 6.2.)</p>
SP 4	<p><b>Affordable Housing</b></p> <p>Provision will be made for a minimum of 750 affordable homes across the plan period.</p> <p>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.</p> <p><b>Proposed amendments:</b></p> <p>Amend – Affordable Housing target to be increased to reflect the results of the latest Local Housing Market Assessment</p>	<ul style="list-style-type: none"> <li>• It significantly helps in delivering homes that meet everyone's needs (SA 1) and healthier communities (SA 2).</li> <li>• Sufficient availability of affordable housing should enable younger people to remain in Denbighshire and will discourage the conversion of employment land into residential land (SA 6).</li> <li>• It will be dependent on implementation as to how it impacts on green and blue infrastructure, open space (SA 3), public transport services and active travel opportunities (SA 4), town and rural centres (SA 7), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11) as well as ensuring resilience to climate change (SA 12).</li> <li>• There is no clear trend as to how development impacts on the Welsh language; in some locations development hinders it whilst in other locations it helps increase the number of Welsh speakers (SA 5).</li> </ul> <p><b>Commentary on proposed amendments:</b></p> <p>The proposed amendment is positive:</p> <p>SA 1 and SA 2 - they add to the significant positive impact for providing homes for everyone that meet their needs and create healthier communities.</p> <p>(No change to SA Assessment Matrix at Table 6.2.)</p>



SP 7	<p><b>Bodelwyddan Strategic Site</b></p> <p>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.</p> <p>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.</p> <p><b>Proposed amendments:</b></p> <p><b>Recommendation – delete key policy</b></p>	<ul style="list-style-type: none"> <li>• It significantly helps the local economy, encouraging the use of employment land in the county and needs to be met locally (SA 6).</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2), green infrastructure (SA 3) and serviced communities (SA 4). In allocating a key strategic site for development it helps to protect town and rural centres (SA 7), the environment (SA 9) and the landscape (SA 10) from unsustainable development and by using phasing the impact on the environment should be positive.</li> <li>• Welsh language may be helped and hindered (SA 5).</li> <li>• Implementation will determine the impact on finite resources (SA 8) and the cultural built environment (SA 11).</li> </ul> <p><b>Commentary on proposed amendments:</b></p> <p>The Bodelwyddan Strategic Site is not deliverable and therefore continuing to include such a policy where a site is not deliverable will have a negative impact. Its removal can therefore only be positive.</p> <p>The policy will be removed from the SA Assessment Matrix at Table 6.2. and the overall assessment reviewed.</p>
SP 8	<p><b>Infrastructure</b></p> <p>Development will be directed to locations where the necessary infrastructure will be available.</p> <p>New developments will be expected to contribute to the provision of infrastructure, where necessary to mitigate the impacts of new development, comprising:</p> <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>	<ul style="list-style-type: none"> <li>• Significantly helps in delivering well serviced communities (SA 4), a strong local economy (SA 6), town and rural centres (SA 7).</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2), green and blue infrastructure (SA 3), increasing the number of Welsh speakers (SA 5) and communities that are resilient to climate change (SA 12).</li> <li>• Implementation will control how finite resources are utilised (SA 8), whether there is a positive or negative impact on the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> </ul> <p><b>Commentary on proposed amendments:</b></p> <p>The proposed amendment is positive:</p> <p>SA 1, SA 2, SA 3 – it adds to the provision of providing suitable homes, healthier communities and green and blue infrastructure.</p> <p>SA 8, SA 9 and SA 10 – it supports utilising finite resources responsibly and supports the environment and landscape although overall implementation will determine the impact, so no change to the SA Assessment Matrix.</p>

	<p><b>Proposed amendments:</b></p> <p>Amend to include reference to water management infrastructure.</p>	<p>SA 12 – It will further positively ensure local communities are resilient to the effects of climate change.</p> <p>(No change to SA Assessment Matrix at Table 6.2.)</p>
SP 9	<p><b>Visitor Economy</b></p> <p>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.</p> <p><b>Proposed amendments:</b></p> <p>Amend to include 'conserve and enhance the county's natural and built environment'.</p>	<ul style="list-style-type: none"> <li>• It significantly helps the local economy (SA 6) and town and rural centres (SA 7) encouraging the use of employment land in the county and needs to be met locally (SA 6).</li> <li>• Strengthening the visitor economy and conserving the natural and built environment should contribute to creating healthier communities (SA 2), a diverse environment (SA 9), help maintain the landscape (SA 10) as well as the cultural and historic built environment (SA 11).</li> <li>• Implementation will impact on green and blue infrastructure (SA 3), how well communities are served (SA 4) control how finite resources are utilised (SA 8) and resilience to climate change (SA 12).</li> <li>• Welsh language may be helped and hindered (SA 5).</li> <li>• There is no direct link to creating homes that meet everyone's needs (SA 1).</li> </ul> <p><b>Commentary on proposed amendments:</b></p> <p>The proposed amendment is positive:</p> <p>SA 3 – it adds to the provision of providing green and blue infrastructure although overall implementation will determine the impact, so no change to the SA Assessment Matrix.</p> <p>SA 9, SA 10 and SA 11 – it further supports a diverse environment, helps maintain the landscape as well as the cultural and historic built environment.</p> <p>(No change to SA Assessment Matrix at Table 6.2.)</p>

6.3 The assessment of the recommended amendments to Key Strategic Policies in terms of the SA assessment matrix can be seen in Table 6.2 below.

*Table 6.2: SA Assessment Matrix of Replacement LDP Recommended Amended Key Strategic Policies.*

Strategic Policy	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	Over-all
SP 1	+	++	+	+	++	+	+	+	+	+	+	++	+
SP 2	+ / -	+ / -	+ / -	+ / -	++	+ / -	+ / -	No link	No link	+	+	+ / -	+ / -
SP 3	++	++	#	#	+ / -	+	#	#	#	#	#	#	#
SP 4	++	++	#	#	+ / -	+	#	#	#	#	#	#	#
SP 5	+	+	#	+	+ / -	++	++	#	#	#	#	#	+
SP 6	+	+	#	#	+	++	++	#	#	#	#	#	+
SP 8	+	+	+	++	+	++	++	#	#	#	#	+	+
SP 9	No link	+	#	#	+ / -	++	++	#	+	+	+	#	++
SP 10	No link	+	++	++	No link	++	++	#	#	#	#	++	++
SP 11	No link	No link	No link	No link	No link	+	+	++	+	#	#	+	+
SP 12	+ / -	+	#	#	No link	+ / -	+	++	+	+	#	+	+
SP 13	+ / -	+	+	#	#	+	+	+	++	++	++	+	++
Overall	+	++	+	+	+	++	++	+	+	+	+	+	+

## VII. Conclusion

- 7.1 The proposed changes to the Draft Preferred Strategy will increase the sustainability of the Replacement LDP.
- 7.2 The recommended changes to the vision, objectives, growth and spatial strategy as well as the key policies have made the Replacement LDP more positive in terms of sustainability and therefore more sustainable.
- 7.3 The recommended change to the vision to include reference to climate change is a positive step in terms of sustainability. This report recommends that the wording also refer to climate change that seeks to reduce resource consumption so that finite resources are protected for future generations.
- 7.4 The recommended changes to the Draft Preferred Growth Strategy is sustainable in terms of combining the housing provision, affordable housing need and employment land.
- 7.5 Distributing growth to serviced settlements together is sustainable. Allowing flexibility of growth, in terms of infill and small sites in un-serviced settlement that focuses on meeting local needs will be sustainable, if the policies reflect the requirement of considering need and cumulative effects. Including reference to being resilient to the effects of climate change being delivered within the means of the natural environment will assist in ensuring that only appropriate growth is permitted in sustainable locations.
- 7.6 Impacts on finite resources and the natural, historic, cultural, as well as the built environment and landscape will still depend on how the key policies and strategic options are implemented. These will be considered in the Updated Sustainability Appraisal that will be prepared with the Deposit Plan.

- 7.7 Similarly cumulative impacts and mitigation measures will further be considered in the Updated Sustainability Appraisal that will be prepared with the Deposit Plan.
- 7.8 This sustainability assessment report supports all the recommended changes and recommends that the wording of the change to the vision include reference to protecting finite resources.

## VIII. Appendix A: SA Framework as set out in the Initial Sustainability Appraisal Report 2019

Table A.1: SA Framework

SA Objectives	Decision Making Influences
<b>SA 1:</b> Everyone lives in homes that meet their needs.	<p>Will the RLDP make sufficient provision for additional housing required by residents of Denbighshire?</p> <p>Will the RLDP increase the provision of affordable housing?</p> <p>Will the RLDP contribute to creating homes that are healthier?</p>
<b>SA 2:</b> Communities are healthier.	<p>Will there be a positive or negative impact on human health?</p> <p>Will the RLDP allow people to utilise open space?</p> <p>Will the RLDP situate development where it is sustainable and there is access to services?</p> <p>Will the RLDP have a positive or negative impact on the existing air quality baseline?</p> <p>Will the RLDP contribute to social inclusion?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP encourage the expansion of high quality, sustainable settlements?</p>
<b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.	<p>Will the RLDP allow people to make more sustainable transport choices?</p> <p>Will the RLDP protect and/or create green or blue infrastructure?</p> <p>Will the RLDP create, enhance, recover or mitigate the loss of open space?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP positively or negatively impact on coastal and inland water quality?</p>
<b>SA 4:</b> Local communities are well served by public	<p>Will the RLDP allow people to make more sustainable transport choices?</p>

transport and provided with multiple opportunities to engage in active travel.	<p>Will the RLDP increase or decrease the emissions of air pollutants from transport?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP protect and/or create green or blue infrastructure?</p>
<b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.	<p>Will the RLDP encourage the growth of the Welsh language?</p>
<b>SA 6:</b> There is a strong local economy and successful regeneration.	<p>Will the RLDP encourage needs to be met locally?</p> <p>Will the RLDP encourage the retention of young people?</p> <p>Will there be any adverse economic impacts on employment premises or land?</p> <p>Will the RLDP positively or negatively impact on job opportunities?</p> <p>Will the RLDP positively or negatively impact on the use of brownfield land?</p> <p>Will the RLDP positively or negatively impact on current redundant, vacant or derelict buildings?</p> <p>Will the RLDP increase or reduce the amount of redundant, vacant or derelict buildings?</p>
<b>SA 7:</b> Denbighshire's town and rural centres are not in decline.	<p>Will the RLDP positively or negatively impact on job opportunities?</p> <p>Will there be any adverse economic impacts on employment premises or land?</p> <p>Will the RLDP positively or negatively impact on main and local centres?</p> <p>Will the RLDP positively or negatively impact on rural or village services?</p>
<b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.	<p>Will the RLDP contribute to reducing resource consumption?</p> <p>Will the RLDP increase or decrease land contamination?</p> <p>Will the RLDP improve or degrade soil quality?</p> <p>Will the RLDP positively or negatively impact high quality agricultural land?</p>

	<p>Will the RLDP positively or negatively impact areas of peat?</p> <p>Will the RLDP positively or negatively impact on mineral reserves?</p>
<p><b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.</p>	<p>Are there any designated or non-statutory habitats or species that may be affected by the LDP?</p> <p>Are there opportunities to create, enhance, recover or mitigate the loss of species or habitat?</p> <p>Are there opportunities to create, enhance or mitigate the loss of open space and green or blue infrastructure?</p> <p>Will there be a positive or negative impact on human health?</p> <p>Will the RLDP improve or degrade soil quality?</p> <p>Will the RLDP positively or negatively impact on air quality?</p> <p>Will the RLDP positively or negatively impact on water quality?</p>
<p><b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.</p>	<p>Are there any designated or non-statutory natural landscapes that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory historic landscapes that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory cultural landscape or environment that may be affected by the RLDP?</p>
<p><b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.</p>	<p>Are there any designated or non-statutory historic sites or buildings that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory cultural sites, features or buildings that may be affected by the RLDP?</p>
<p><b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.</p>	<p>Will the RLDP have a positive or negative impact on CO<sub>2</sub> emissions?</p> <p>Will the RLDP encourage the use of renewable energy?</p> <p>Will the RLDP increase the number of properties at risk of flooding?</p> <p>Will the RLDP contribute to a reduction in flood risk?</p> <p>Will the RLDP contribute to social inclusion?</p> <p>Will the RLDP contribute to improved water management?</p> <p>Will the RLDP increase or minimise soil erosion?</p>



## IX. Appendix B: SA Assessment Matrix as set out in the Initial Sustainability Appraisal Report 2019

Table B.1: SA Assessment Matrix

Assessment Scale	Effect Prediction	Effect Evaluation	Effect Mitigation / Action
++	Very positive	Significantly helps in achieving SA objective	Can the very positive effect be enhanced?
+	Positive	Helps in achieving SA objective	Can the positive effect be enhanced?
+ / -	Positive and negative	Helps and hinders SA objectives	Can the negative effect be mitigated? Can the positive effect be enhanced?
?	unclear	More information is required	Identify data sources. Ascertain when information can be obtained
#	Dependent on implementation	It could help or hinder SA objectives depending on how it is implemented	Consider re-wording or additional guidance to ensure positive implementation.
-	Negative	Hinders and conflicts with SA objectives	Reconsider, amend or mitigate effect.
--	Very negative	Significantly conflicts and hinders SA objectives.	Substantive measures are required to mitigate the effect and preferably amendments should be made.

**Habitats Regulation Assessment for  
Denbighshire Local Development Plan 2018 - 2033  
(Draft Preferred Strategy, February 2023)**

**1. Introduction**

Denbighshire County Council (DCC) is in the process of preparing a new Local Development Plan (LDP). The forthcoming land use plan is going to set out where and how much development will take place in Denbighshire until the end of the plan period. Besides accommodating growth by means of directing new development to specific areas, the document will also include local policy on design and qualitative criteria that shape development in a sustainable manner, set out the likely need for planning contributions and provide protection for the built and natural environment.

Being a statutory land use plan, the LDP must be subject to a Habitats Regulations Assessment (HRA) as stipulated by Part 6 Chapter 8 of “The Conservation of Habitats and Species Regulations 2017”. The purpose is to ascertain the local planning authority (LPA) that the proposed plan is not going to undermine – either alone or in combination with other plans - the conservation objectives of the qualifying features in ‘national network sites’, formerly referred to as ‘European sites’ in the UK.

HRA is an independent and iterative process that should be carried out alongside existing plan making procedures. Both are however linked by a continuous cycle of information exchange between plan element appraisal and the likely need for amendments; to avoid any procedural or legal legislative conflicts prior to plan adoption by the LPA. Its documentation should be formalised at principal stages, including Pre-Deposit and Deposit.

The Council has consulted with members of the public and statutory consultees on the draft Preferred Strategy, including a HRA, and seeks to make a small number of amendments prior to preparing the Deposit LDP. The Preferred Strategy aims to set out the broad approach to scale and location of growth. There is limited information on

details. It provides however the framework for detailed policies, proposals and site allocations which will be included in the Deposit LDP.

Carrying out a review of the HRA for the Preferred Strategy, including proposed amendments, will provide crucial information for the next stage in the plan making process. While the screening of individual plan elements may indicate the likelihood of significant effects occurring and, consequently, will require an 'appropriate assessment' at Deposit stage, the Council will be in the position to consider alternative sites or mechanisms to deliver development, and incorporate cancellation or mitigation measures in the plan. The Preferred Strategy is not the final version of the plan that the Council would like to adopt. There are further stages at which more details become available to inform the next HRA.

## **2. Legislative Background**

There is great concern about the continuous decline in biodiversity across the European continent. Hence the environmental policy of the European Union aims at preserving, conserving and enhancing biodiversity through legal instruments, such as Council Directives which subsequently are transposed into national legislation by member states.

'Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna' (Habitats Directive) and 'Directive 2009/147/EC on the conservation of wild birds' ([new] Birds Directive) support the installation of an ecological network of designated sites known as NATURA2000. Both Directives are linked by Article 7 of the Habitats Directive, which stipulates the replacement of any obligations arising from Article 4 of the (old) Birds Directive. Habitats Regulations Assessments must therefore take account of sites designated under the Birds Directive.

The United Kingdom of Great Britain and Northern Ireland left the European Union in 2019, which required amendments to "The Conservation of Habitats and Species Regulations 2017" (Habitats Regulations 2017) as detailed in the "The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019" (Habitats

Regulations 2019). Besides replacing reference to European bodies with national equivalents, the duty to carry out HRAs for land use plan remains in place.

### 3. The National Site Network

The Habitats Regulations 2017 set out which internationally designated sites for nature conservation were to be regarded as ‘European sites’ and ‘European marine sites’ in terms of HRA: Special Areas of Conservation (SACs); candidate Special Areas of Conservation (cSACs); SACs and cSACs that are European Offshore Marine Sites; Special Protection Areas (SPAs); and Special Protection Areas that are European Marine Sites. Welsh Government (WG) stipulated that proposed SPAs and Ramsar sites have to be included in the HRA of projects and plans.

Being amended by the Habitats Regulations 2019, the collective terms ‘European sites’ and ‘Internationally designated sites for nature conservation’ were replaced by ‘National Site Network’. Table 1 sets out the legal source and designating authority for different site designations.

Table 1: ‘National Site Network’ site designations that are relevant to HRAs in Wales

Site Designation	International Directives / Obligations ( <i>prior to 2019</i> )	Designating Authority
Special Areas of Conservation (SACs) including candidate Special Areas of Conservation (cSACs) and SACs and cSACs that are European Offshore Marine Sites	Designated under Article 4 of the EC Directive on the Conservation of Natural Habitats and of Wild Fauna & Flora (92/43/EEC) (the Habitats Directive) via Regulations 7 and 8 of the Conservation (Natural Habitats &c) Regulations 1994 and Regulations 7 to 11 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.	Designated by the Welsh Ministers in the light of recommendations made by Natural Resources Wales (NRW) through the JNCC; beyond the territorial sea adjacent to Wales, SACs are designated by the UK Government on the advice of the Joint Nature Conservation Committee (JNCC).
Special Protection Areas (SPAs) including SPAs that are European	Classified under Article 4 of the EC Directive on the Conservation of Wild Birds (79/409/EEC) (the Birds	Classified by the Welsh Ministers in the light of recommendations made by NRW through the

Offshore Marine Sites	Directive) and Regulation 12 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.	JNCC; beyond the territorial sea adjacent to Wales, SPAs are classified by the UK Government on the advice of JNCC.
Ramsar Sites	Designated under Article 2 of the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).	Designated by the UK Government in the light of recommendations made by NRW through the JNCC.

Source: Welsh Government, Technical Advice Note 5 (2009), p. 20

From experience with producing the HRA for the adopted Denbighshire LDP 2006 to 2021, the conservation objectives of protected features in thirteen sites could be affected by proposals contained in the emerging land use plan. They will form the basis for the screening, and, if required, appropriate assessment. Sites are either located within the County boundary, cross boundaries with adjacent local authorities, or are entirely outside but linked to the plan area in a way that warrants their consideration. Table 2 list the thirteen sites. Appendix 1 displays the location.

Table 2: Sites to be considered for screening and appropriate assessment

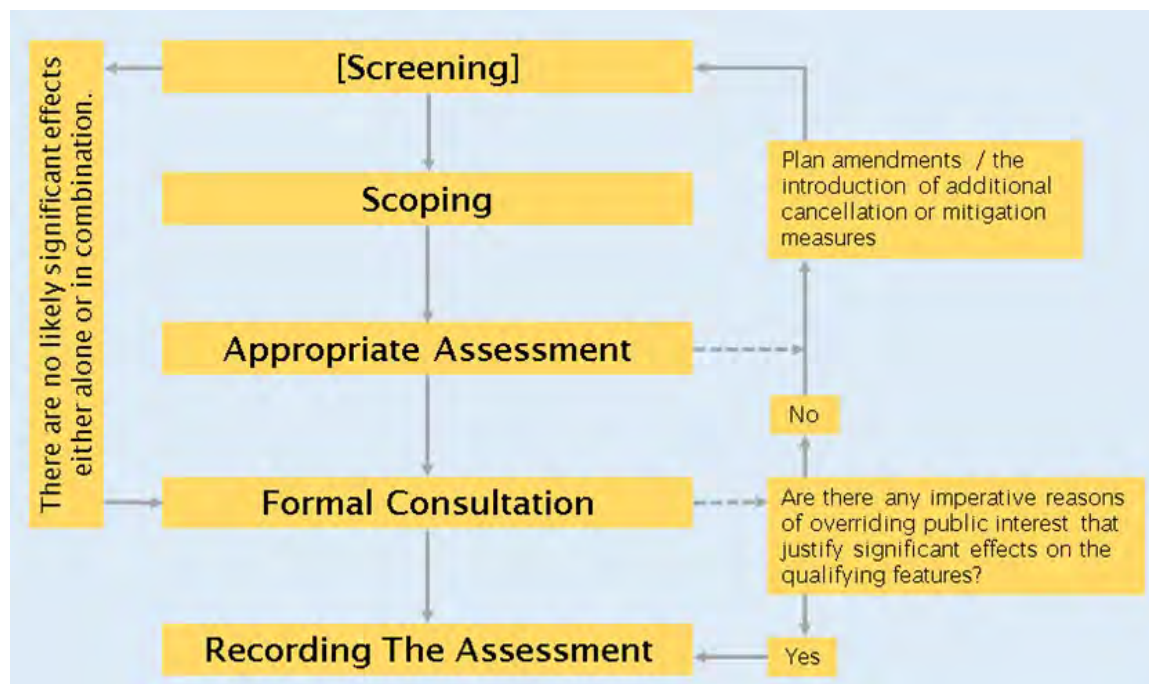
Site Name	Site Designation	Located within DCC
Llwyn	Special Area of Conservation	Yes
Coedwigoedd Dyffryn Elwy / Elwy Valley Woods	Special Area of Conservation	Partly
Coedwigoedd Dyffryn Alun / Alun Valley Woods	Special Area of Conservation	Partly
Berwyn a Mynyddoedd de Clwyd / Berwyn and South Clwyd Mountains	Special Area of Conservation	Partly
Afon Dyfrdwy a Llyn Tegid / River Dee and Bala Lake	Special Area of Conservation	Partly
Mynydd Helygain / Halkyn Mountain	Special Area of Conservation	No
Aber Dyfrdwy / Dee Estuary	Special Area of Conservation	Coast
Deeside and Buckley Newt Sites	Special Area of Conservation	No
Johnstown Newt Sites	Special Area of Conservation	No
Y Berwyn / Berwyn	Special Protection Area	Partly
Bae Lerpwl / Liverpool Bay	Special Protection Area	Coast
Aber Dyfrdwy / Dee Estuary	Special Protection Area	Coast

Aber Dyfrdwy / Dee Estuary	Ramsar	Coast
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#### 4. Methodology

Methodology for preparing HRAs for a land use plan is outlined in Regulations 105 and 107 of the Habitats Regulations 2017 (as amended), which set two principal tests that the plan has to pass in order to comply. WG provides procedural guidance in (Planning) Technical Advice Note 5: Nature Conservation and Planning, Annex 6. Further practical advice is provided in David Tyldesley and Associates, produced for the former Countryside Council for Wales, 'Draft Guidance for Plan Making Authorities in Wales -The Appraisal Of Plans Under The Habitats Directive' (2009).

Figure 1 outlines an overview of the HRA process.



Regulation 105 contains the two principle tests that determine whether a LPA has to conduct an appropriate assessment of the proposed plan before adoption:

- 1) The land use plan *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- 2) *is not directly connected with or necessary to the management of the site.*

Since the forthcoming DCC LDP will not be directly connected to the management of a SAC or SPA, the test must focus on the determination of whether there are any plan elements that are likely to have a significant effect on the qualifying features (either alone or in combination with other plans or projects).

The Waddenzee judgement (European Court of Justice Case C-127/02) provided a steer for the interpretation of the terms 'likely' and 'significant'. TAN 5, Appendix 6 - p. 82 states:

- *The development plan should be considered 'likely' to have such an effect if the planning authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site or European offshore marine site, either alone or in combination with other plans and projects.*
- *An effect will be 'significant' in the context if it could undermine the site's conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site or European offshore marine site in question.*

While the Habitats Regulations 2017 (as amended) do not contain any reference to 'Screening', it has become a useful mechanism to eliminate those plan elements that are unlikely to cause significant effects on the qualifying features due to its nature, for example local policy on design criteria and developer contributions, or their gist, such as local policy on the protection of biodiversity. Section 6 details the screening of the Preferred Strategy.

If the likelihood of a significant effect (either alone or in combination) cannot be excluded on the basis of available information, the plan making authority needs to agree with Natural Resources Wales (NRW) the 'Scope' and details for an appropriate assessment.

The purpose of an 'Appropriate Assessment' is to investigate in detail the potentially significant effects on individual qualifying features of every concerned European site on the basis of available information and scientific knowledge. Unlike the 'Scoping'

stage, an appropriate assessment can take notice of any mitigation measures aiming to reduce adverse effects.

Based on the results of the appropriate assessment, local planning authorities may consider the elimination of, or changes to, the previously identified plan elements. There is alternatively an opportunity to propose avoidance or mitigation measures that either cancel or minimise the likelihood of significant effects. Any amended or additionally proposed plan element has to be tested again.

The local planning authority consults with NRW on the findings of the scoping and/ or appropriate assessment at the relevant stage in the plan preparation process. The HRA document can be finalised if the statutory consultee does not object to the recorded results of the assessment.

Further legal procedures (see Regulation 107 of the Habitats Regulations 2017) apply in the event of the plan making authority insist in proceeding with the LDP towards adoption despite the identification of elements that are likely to cause significant effects on the qualifying features of any concerned European site. This may be the case for 'Imperative Reasons of Overriding Public Interest'.

## **5. Tighter phosphorus targets for the 'River Dee and Bala Lake SAC'**

NRW set new phosphorus targets for the nine river SACs in Wales on the 21st January 2021. The objective is to improve the water quality by reducing load levels by defining new targets, which are about 50% to 80% lower than the previous standards. The nature conservation body published a compliance assessment report at the beginning of 2021 which has shown that over 60% of relevant waterbodies are failing against the tighter targets, including sections of the River Dee in north east Wales.

The Joint Nature Conservation Committee (JNCC) produces a Core Management Plan (CMP) for every site that forms part of the 'National Site Network'. CMPs contain important information on, for example, conservation objectives, conservation status for every designated site feature and any management requirements, which are



fundamental to HRAs. These documents have been updated to reflect the tighter phosphorus targets.

Denbighshire prepared the draft Preferred Strategy and any supporting evidence in 2019; before the introduction of the new targets. The HRA did not take account of them. Appendix 2 contains a map that shows the spatial extent of the 'SAC phosphorus compliance catchment' and 'SAC phosphorus sensitive area'. Both cover about 42% of land in Denbighshire.

Due to the lack of technical expertise and guidance, there is currently uncertainty regarding the delivery of development within the area but WG, NRW and partner organisations work on solutions that could allow for limited growth in the south of the Denbighshire.

Denbighshire joint the Nutrient Management board for the River Dee, which is a voluntary, strategic and long-term partnership with the principal aim to secure overall improvements in water quality and achieve the phosphorus conservation objective targets for the respective SAC across local authority boundaries.

NRW recognises that following the principles of 'nutrient neutrality' is an approach to demonstrate that new development will not have an adverse impact on SAC rivers. They are concerned with managing new development and water discharge permit proposals to prevent them from causing any net increase in nutrients for the duration of the authorisation.

NRW and Dŵr Cymru Welsh Water are in the process of reviewing the phosphate stripping licences for waste water treatment works (WWTW) to determine whether there is any headroom left to allow for further development to be connected without exceeding permitted phosphate levels. The results will not only inform the timetable for any WWTW upgrading work programme but also indicate the amount and extent of any future cancellation or mitigation measures.

Tighter phosphate targets for the "River Dee and Bala Lake SAC" are to be considered as part of the HRA for the Deposit LDP. There will be the need to carry out an

‘appropriate assessment’ for all development proposals within the ‘SAC phosphorus compliance area’ and the ‘SAC phosphorus sensitive catchment’.

## 6. Screening

As set out above, screening has become a useful mechanism to eliminate those plan elements that are unlikely to cause significant effects on the qualifying features due to its nature. David Tyldesley and Associates for (at the time) Countryside Council for Wales put forward four principal categories to assist plan-making authorities in qualifying the reasons behind the decision to include/ exclude individual plan elements in an appropriate assessment.

The four principal categories are listed below. Further information, including sub-categories, can be found in Appendix 3:

Category A: No negative effect;

Category B: No significant effect;

Category C: Likely significant effect; and

Category D: Likely significant effect in combination.

Appendix 4 contains the screening table for the draft Preferred Strategy, including any proposed amendments. Due to the nature of the draft Preferred Strategy and a lack of detail on policies, site allocations and potential cancellation measures, there is limited merit to carry out an appropriate assessment at this stage in the plan making process. The Council is not going to adopt the Preferred Strategy as the next land use plan for the County. Table 3 provides an overview of draft key policies where it cannot be excluded on the basis of available information that likely significant effects alone may occur.

Table 3: Draft key policies to be further investigated regarding LSEs

Draft Key Policy	Deposit LDP
Housing	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.

Affordable Housing	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Employment Land	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Retail	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Infrastructure	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Visitor Economy	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Transport & Accessibility	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Minerals	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Waste	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
New key policies on climate change, reducing carbon emissions, renewable energy and retail	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.

The purpose (and benefit) of identifying these plan elements is to raise awareness when preparing supporting policies and selecting candidate sites. It's an opportunity to consider implementation and potential mitigation from the outset at the next stage.

Depending on the outcome of the screening exercise, there remains the need to consider any 'in-combination effects' with other, for example, land use plans, strategies, programmes, etc. Table 4 provides an overview over potential plans and strategies that could be part of any 'in-combination' considerations. List is not conclusive. The selection process (or detailed list) will depend on the likely significant

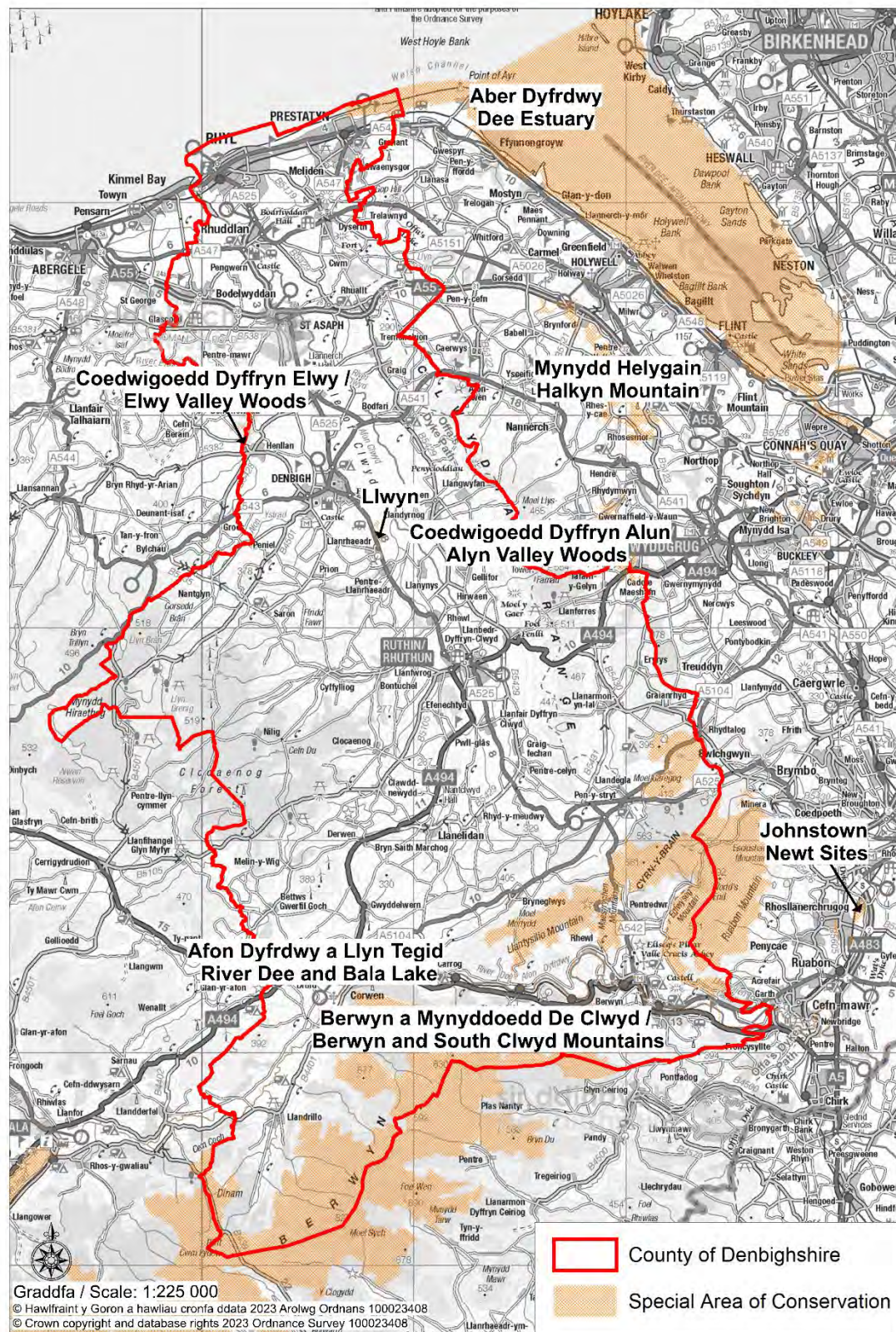
effect that is to be assessed; such as fragmentation or loss of biodiversity, degradation to water quality or increase in ambient noise levels.

Table 4: List of selected plans and strategies to be part of 'in-combination' assessment

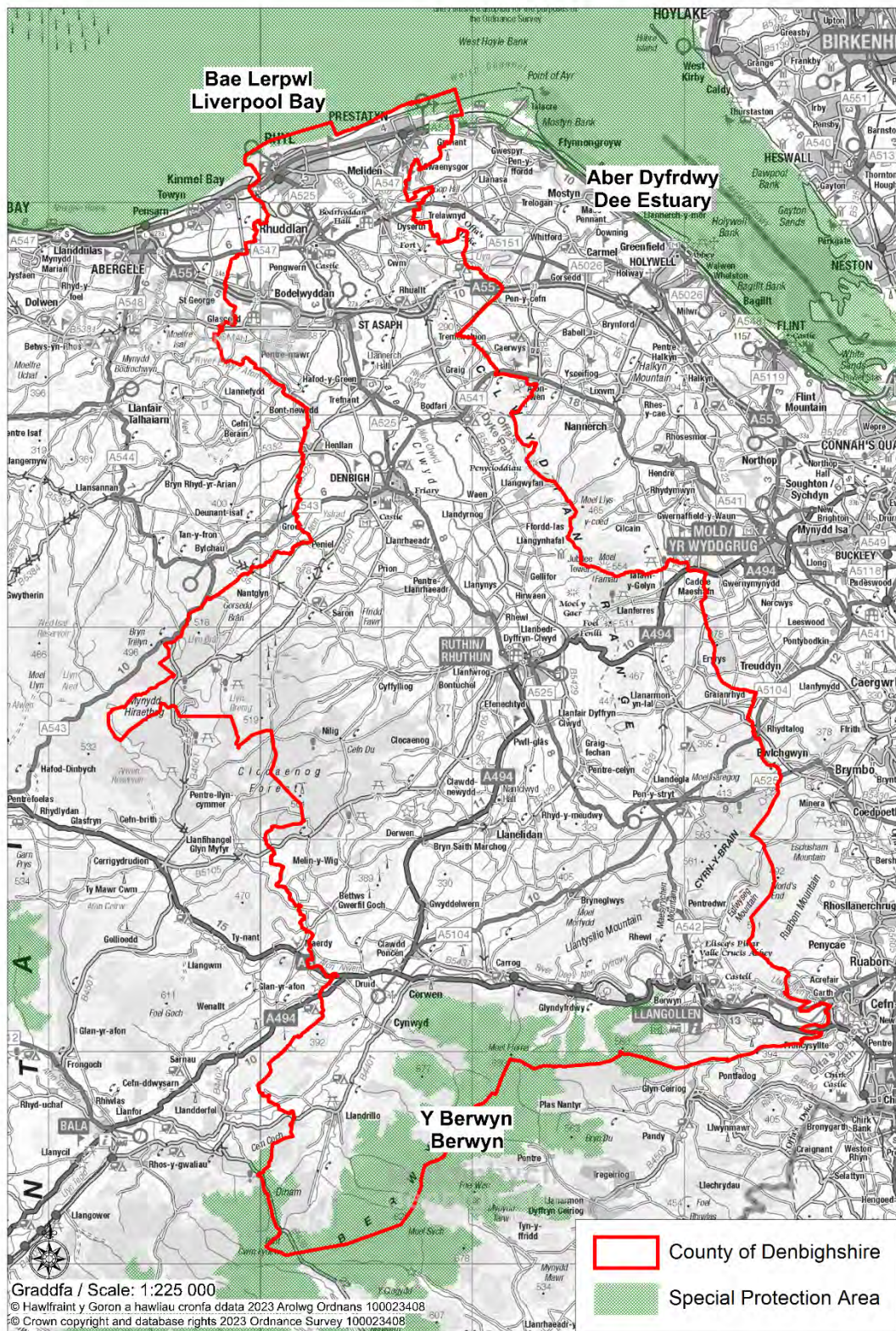
Organisation	Title	Year
Welsh Government	An Active Travel Action Plan for Wales	2016
Welsh Government	Energy Efficiency in Wales, A Strategy for the next 10 years 2016 - 2026	2016
Welsh Government	Nature Recovery Action Plan for Wales	2015
Welsh Government	Local Air Quality Management	2017
Natural Resources Wales	Dee river basin management plan (2021 – 2027)	2022
Natural Resources Wales	North East Wales Area Statement / Marine Area Statement	2021
'Clwydian Range and Dee Valley AONB' Joint Committee	AONB Management Plan	---
Denbighshire County Council	Economic & Community Ambition Strategy 2013 - 2023	2013
other LPAs	Local Development Plans	---
Dŵr Cymru Welsh Water	Draft Water Resources Management Plan 2024	---
Dŵr Cymru Welsh Water	Asset Management Plan 6/ 7	---



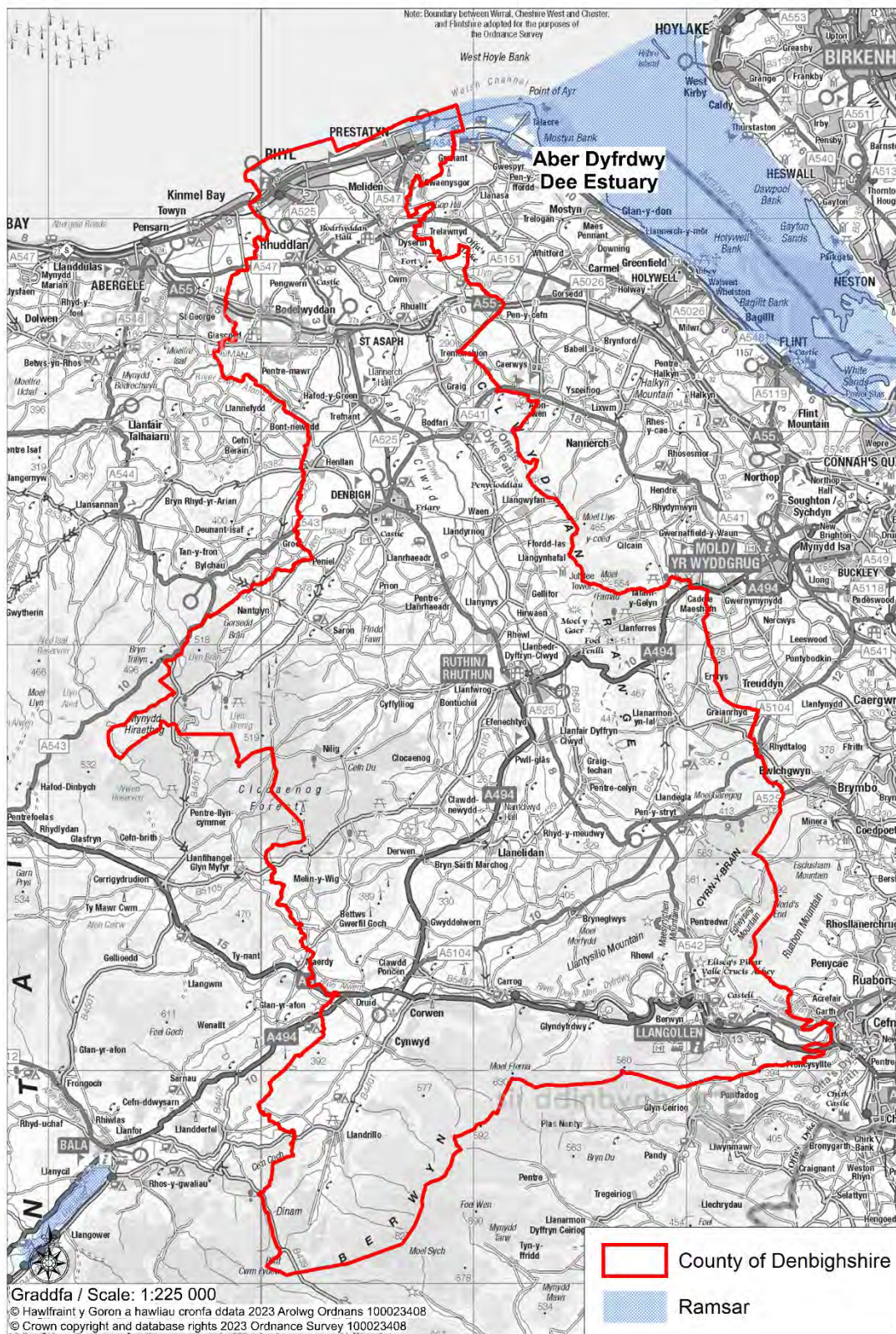
## Appendix 1 – National Site Network





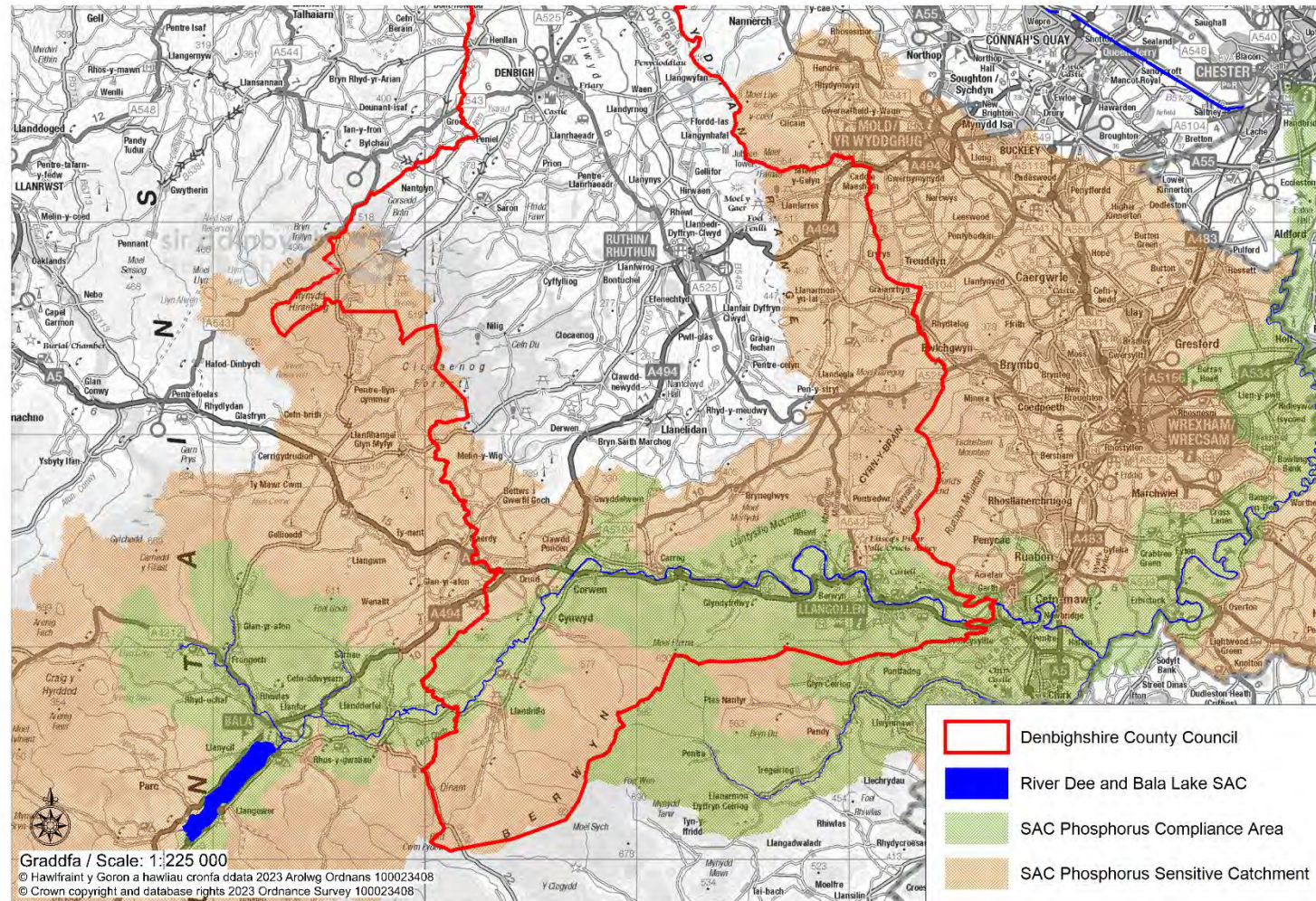








## Appendix 2 – River Dee and Bala Lake SAC





## Appendix 3 - Description of ‘Screening’ assessment categories

<i>Category A: No negative effect</i>	
<b>A1</b>	Options/ policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy
<b>A2</b>	Options/ policies intended to protect the natural environment, including biodiversity
<b>A3</b>	Options/ policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site
<b>A4</b>	Options/ policies that positively steer development away from European sites and associated sensitive areas
<b>A5</b>	General policy statements or policies which only express general intentions or political aspirations

<i>Category B: No significant effect</i>	
Options/ policies that could have an effect but would not be likely to have a significant (negative) effect on a European site (alone or in combination with other plans or projects) because the effects are trivial or ‘de minimis’, even if combined with other effects	

<i>Category C: Likely significant effect alone</i>	
<b>C1</b>	The option, policy or proposal could <b>directly affect</b> a European site because it provides for, or steers, a quantity or type of development onto a European Site, or adjacent to it
<b>C2</b>	The option, policy or proposal could <b>indirectly affect</b> a European site, e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrological or physically connected to it or it may increase disturbance as a result of increased recreational or other pressures
<b>C3</b>	Proposals for a <b>magnitude of development</b> that, no matter where it was located, the development would be likely to have a significant effect on a European site
<b>C4</b>	An option, or policy that makes provision for a type of development, generally, (and may indicate a broad scale and/ or one or more broad locations e.g. a particular part of the plan area), so a likelihood of a significant effect cannot be ruled out, but the more precise scale and/ or detailed location of the development is to be selected following <b>consideration of options in a later, more specific, lower tier plan</b> , subject to Habitats Regulations Appraisal

<b>C5</b>	Options, policies or proposals for developments or infrastructure projects that could <b>block options or alternatives</b> for the provision of other development or projects in the future, which will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided
<b>C6</b>	Options, policies or proposals which <b>depend on how the policies etc are implemented</b> in due course, for example, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site, and is not merely a general statement of policy
<b>C7</b>	Any other option, policies or proposals that would be <b>vulnerable to failure</b> under the Habitats Regulations at project assessment stage; to include them into the plan would be regarded by the EC as 'faulty planning'
<b>C8</b>	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the <b>plan provides the imperative reasons</b> of overriding public interests to justify its consent despite a negative assessment

*Category D: Likely significant effect in combination*

<b>D1</b>	The option, policy or proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies or proposals <b>provided for or coordinated by</b> the plan (internally) the <b>cumulative</b> effects would be likely to be significant
<b>D2</b>	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are <b>combined with the effects of other plans or projects</b> , and possibly the effects of other projects provided for in the plan as well, the combined effects would be likely to be significant
<b>D3</b>	Options or proposals that are, or could be, part of a <b>programme or sequence of development</b> delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites

Source: Tyldesley, D., 2009, *Draft Guidance for Plan Making Authorities in Wales: The Appraisal of Plans under the Habitats Regulations* for Countryside Council for Wales CCW Bangor; Chapter 5

## Appendix 4 – Draft Preferred Strategy ‘screening’

Document Reference	Plan element purpose/ function	Proposed change to draft Preferred Strategy	Assessment Category*	‘Appropriate assessment’ to be carried out at this stage in plan making process?	Considerations for preparing Deposit LDP HRA	Commentary
Profile of Denbighshire	Statistical data and description of County.	None.	None.	No.	None.	None.
Key Issues and Challenges for Denbighshire	Identification of challenges and issues that are to be addressed by LDP.	None.	None.	No.	None.	None.
LDP Vision	Vision.	None.	None.	No.	None.	None.
LDP Objectives	Objectives set out priorities and drivers for change in a succinct manner.	Objective 6 to include reference to support for the visitor economy.	A5.	No. LDP Objectives express general intentions and political aspirations.	None.	None.
LDP Objectives	Objectives set out priorities and drivers for	Objective 8 to include a reference to mitigation,	A5.	No. LDP Objectives express general intentions	None.	None.

	change in a succinct manner.	reducing carbon emissions, renewable energy and active travel.		and political aspirations.		
Growth Options	Option 1: Setting out the need for 2,450 new dwellings in the County over the Plan period.	None.	A5.	No. Option expresses an aspiration to deliver number of houses and employment land.	None.	Growth Options are not land use policy that will themselves lead to development.
Growth Options	Option 2: Setting out the need for 3,000 new dwellings in the County over the Plan period.	None.	A5.	No. Option expresses an aspiration to deliver number of houses and employment land.	None.	Growth Options are not land use policy that will themselves lead to development.
Growth Options	Option 3: Setting out the need for 4,550 new dwellings in the County over the Plan period.	None.	A5.	No. Option expresses an aspiration to deliver number of houses and employment land.	None.	Growth Options are not land use policy that will themselves lead to development.
Growth Options	Option 4: Economic forecast (Labour Demand Forecasting) indicates the	None.	A5.	No. Option expresses an aspiration to deliver number of houses and employment land.	None.	Growth Options are not land use policy that will themselves lead to development.

	need for 8.96ha of employment land which would result in the need for 3,600 new dwellings in the County over the Plan period.					
Growth Options	Option 5: Economic forecast (Past Building Completions) indicates the need for 47.60ha of employment land which would result in the need for 7,500 new dwellings in the County over the Plan period.		A5.	No. Option expresses an aspiration to deliver number of houses and employment land.	None.	Growth Options are not land use policy that will themselves lead to development.
Preferred Growth Option	Proposed level of growth: Setting out the need to deliver	Proposed level of growth: Setting out the need to deliver 3,775 houses and	A5.	No. Preferred Option expresses an aspiration to deliver number of	None.	Preferred Growth Option is a general policy statement but not a land use policy.

	3,775 houses and 68.60ha of employment land over the plan period.	41ha of employment land over the plan period.		houses and employment land.		
Sustainable Settlement Hierarchy	Assessment of infrastructure provision in existing settlements was used to inform different options for locating future development.	None.	None.	No.	None.	Preparation of settlement classification categories.
Spatial Options	Option 1: 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.	None.	A5.	No. Spatial option expresses an aspiration to direct development to selected settlements in line with their position in the sustainable settlement hierarchy.	Focus on translation of spatial option into local policy and site allocations in LDP Deposit.	Spatial Options are not land use policy that will themselves lead to development.  Implementation depends on local policy, site allocations or settlement boundary changes. These details will be available at LDP Deposit stage.

Spatial Options	Option 2: This would focus growth in a single major mixed-use site in Bodelwyddan, with lower levels of growth in the main/ local centres and villages with services/ facilities. Villages without services/ facilities would be allowed some growth.	None.	A5.	No. Spatial option expresses an aspiration to direct development to selected settlements in line with their position in the sustainable settlement hierarchy.	Focus on translation of spatial option into local policy and site allocations in LDP Deposit.	Implementation depends on local policy, site allocations or settlement boundary changes. These details will be available at LDP Deposit stage.
Spatial Options	Option 3: This would focus growth in a single major mixed-use site in Bodelwyddan, with lower levels of growth in the main/ local	None.	A5.	No. Spatial option expresses an aspiration to direct development to selected settlements in line with their position in the sustainable settlement hierarchy.	Focus on translation of spatial option into local policy and site allocations in LDP Deposit.	Implementation depends on local policy, site allocations or settlement boundary changes. These details will be available at LDP Deposit stage.

	centres and villages and unserved villages.					
Spatial Options	Option 4: Option 1 plus development in those settlements without services.	None.	A5.	No. Spatial option expresses an aspiration to direct development to selected settlements in line with their position in the sustainable settlement hierarchy.	Focus on translation of spatial option into local policy and site allocations in LDP Deposit.	Implementation depends on local policy, site allocations or settlement boundary changes. These details will be available at LDP Deposit stage.
Preferred Spatial Option	This will focus development at Bodelwyddan Key Strategic Site and serviced settlements; with limited growth in other settlements, focussing on local needs.	Deletion of Bodelwyddan Key Strategic Site from draft Preferred Strategy. The Spatial Strategy will focus development in the top three tiers of the settlement hierarchy (main centres; local centres, and villages) with limited growth in un-served settlements that focusses on meeting local needs.	A5.	No. Spatial option expresses an aspiration to direct development to selected settlements in line with their position in the sustainable settlement hierarchy.	Focus on translation of spatial option into local policy and site allocations in LDP Deposit.	Implementation depends on local policy, site allocations or settlement boundary changes. These details will be available at LDP Deposit stage.



Draft Key Policy – Placemaking	Policy outlines design and quality criteria for development; reflecting national policy contained in Planning Policy Wales.	Bullet point no. 3 to be amended to read “Maintenance and conservation of natural environment”.	A1.	No. Draft policy relates to design or other qualitative criteria.	None.	Key policy will not itself lead to development.
Draft Key Policy – Welsh language	Policy expresses support for developments that maintain or enhance the integrity of the Welsh language.	None.	A1.	No. Draft policy relates to design or other qualitative criteria.	None.	Key policy will not itself lead to development.
Draft Key Policy – Housing	Policy sets out the cumulative number of houses to be delivered in the County over the plan period.	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Affordable Housing	Policy specifies number of affordable houses to be	Affordable housing target to be increased to reflect the results of the latest ‘Local	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to

	delivered in plan period.	Housing Market Assessment'.		on policy implementation.		be determined at Deposit LDP stage.
Draft Key Policy – Employment Land	Policy aims to provide a mix of strategic and local employment sites.	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Retail	Policy expresses support for 'town centre first' principle and locating new retail development in accordance with a settlement's position in the 'Retail Hierarchy'.	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Bodelwyddan Strategic Site	Policy to support development of strategic site in Bodelwyddan.	Draft key policy to be deleted from Pre-Deposit LDP.	None.	None.	None.	None.
Draft Key Policy – Infrastructure	Policy aims to locate new development	'Water management' to be added to list of	C4.	No. Likely significant effect cannot be	Deposit LDP HRA to focus on detailed	Key policy provides for a type of development in

	where infrastructure is available or can be delivered and sets out criteria for developer's contribution.	infrastructure items that could necessitate developer's contribution.		excluded but there is a lack of detail on policy implementation.	policy and site allocations.	general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Visitor Economy	Policy expresses support for the visitor economy, subject to details and conservation of built and natural environment.	Draft policy criteria to be strengthened by seeking conservation and enhancement of the built and natural environment.	C4 / A2.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Transport & Accessibility	Policy expresses support for improving access to service facilities and employment land by sustainable means,	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.

	including Active Travel.					
Draft Key Policy – Minerals	Policy aims to safeguard limited resources but may lead to development, subject to detail.	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Waste	Policy aims to safeguard limited resources but may lead to development, subject to detail.	None.	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy implementation.	Deposit LDP HRA to focus on detailed policy and site allocations.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.
Draft Key Policy – Natural and Built Environment	Policy aims to preserve and enhance the built and natural environment.	None.	A2.	No.	None.	None.
New Draft Key Policies	Draft Key Policies to be added in Deposit LDP.	New policy on <ul style="list-style-type: none"> <li>- Climate change;</li> <li>- Reducing carbon emissions;</li> </ul>	C4.	No. Likely significant effect cannot be excluded but there is a lack of detail on policy.	Deposit LDP HRA to focus on policy wording.	Key policy provides for a type of development in general but details on scale and location to be determined at Deposit LDP stage.

		<ul style="list-style-type: none"> <li>- Renewable Energy;</li> <li>- Retail provision in smaller settlements.</li> </ul>				
Appendices – Meeting housing needs	Detailed calculation on housing supply in the County	None.	None.	No.	None.	None.

\*Note: See Appendix 3 for description of individual assessment categories.