

# Appendix 2

## SUMMARY OF KEY ISSUES RAISED

### 1. GENERAL COMMENTS ON PROCESS

10 representations received, which were all objections, including responses from Bodelwyddan Town Council, Home Builders Federation, Anwyl Construction and a small number of landowners. The following issues relating to the process were raised:

#### **Is the consultation in line with the Local Development Plan Regulations, Delivery Agreement, and Community Involvement Scheme?**

LDP was formally submitted in line with the agreed Delivery Agreement, since this point the timetable has been in the hands of the Inspector not the Council. Welsh Government has advised that the Delivery Agreement does not need to be updated. All relevant dates for consultations etc have been made available on LDP website. The current additional housing sites consultation is not a stage covered by LDP Wales Regulations 2005, it has been requested by the appointed Inspector and no objection has been received on procedural grounds from Welsh Government. The consultation has been carried out in the same way as the Pre-Deposit, Deposit, Alternative Sites and Focussed Changes consultations and is considered to be in compliance with the Community Involvement Scheme.

#### **Status of the Sites – Council has not endorsed them.**

Results of the consultation will be reported to Full Council and Members asked to approve additional housing sites before submission to Inspector. Any sites going forward to the Examination will therefore have Council endorsement.

#### **Process, how were sites selected? Why were Alternative Sites and some original additional sites discounted?**

Sites were selected from Alternative Sites submitted at Deposit consultation stage and from submitted Candidate Sites. All sites were assessed against the Plan strategy and subject to Sustainability Appraisal. Formal Alternative Sites were submitted by landowners and many not were considered suitable for inclusion. Some original additional sites have not been included due their size and due to the availability further information on constraints affecting these sites.

#### **Capacity and delivery of sites questioned**

Housing numbers on sites are only indicative, and an average of 30 per hectare has been applied to the majority of sites. Actual numbers remain unknown until planning application approved. Sites such as Glasdir, Ruthin and Tower Beach, Prestatyn realised significantly higher numbers than those estimated in the UDP. All sites have been actively promoted by landowners as evidence of intention to deliver them. Some objectors have asked why the Council has proposed less than 1050 dwellings as required by the Inspector,

however the housing numbers put forward for each site are only indicative (using an average assumption of 30 per hectare) and actual numbers are unknown until planning applications are approved. Sites such as Glasdir, Ruthin and Tower Beach, Prestatyn realised significantly higher numbers than estimated in the UDP.

## 2. COMMENTS ON PROPOSED ADDITIONAL HOUSING SITES

### **AHS 01 Land at side of Maes y Graig, Bodfari**

Site area: 0.26ha                      Indicative capacity: 8 homes

10 responses received of which 7 were objections.

The main points of objection related to compliance with the LDP strategy; provision of, and access to, infrastructure and facilities; impact on the Clwydian Range & Dee Valley AONB; and loss of agricultural land. Officers consider that the site is compliant with the strategy as Bodfari is a village located on a strategic highway to the north of the County with several facilities; developers will be required to contribute to infrastructure improvements in line with other LDP policies; no objection has been received from the AONB Joint Advisory Committee, subject to appropriate design and landscaping; and that the site is the most appropriate, given the Inspector's identified need for additional sites and the lack of other more suitable sites.

### **AHS 02 Land at rear of Llys Heulog, Cyffylliog**

Site area: 1.05ha                      Indicative capacity: 5 homes

9 responses received, of which 6 were objections

The main points of objection related to compliance with the LDP strategy; provision of, and access to, infrastructure and facilities; highways impacts; and lack of need for additional housing. Officers consider that the site is compliant with the strategy as Cyffylliog is a village with some facilities and a bus service; the site is small (5 dwellings) and no objections have been raised by the Highways Authority; and that the Inspector has identified a need for additional housing sites.

### **AHS 03 Land adjoining Bryn Gwynt, Cynwyd**

Site area: 0.49ha                      Indicative capacity: 15 homes

9 responses received, of which 5 were objections

Responses to this site were either submitted by statutory consultees, environmental interest groups or agents / companies supporting alternative sites in the County. None were received from residents in Cynwyd. Concern was raised with regard to adverse effects on the Area of Outstanding Beauty (AOB), the surrounding landscape and visual appearance of Cynwyd, impact on local community facilities, and the lack of public transport services.

Policies RD1 and VOE2 seek high quality design and contributions towards infrastructure and community provision would be required in line with the requirements of LDP policy BSC 3. The A5 trunk road runs just 3km to the north of the village - connecting major population centres in the north of Wales.

**AHS 04 Land at Lodge Farm, Denbigh**

Site area: 0.73ha                      Indicative capacity: 22 homes

10 responses received, of which 5 were objections

Denbigh Town Council do not raise objection to the inclusion of this site. Objections were raised regarding the loss of agricultural land, spread of urban area, lack of brownfield land priority, burden on existing facilities: existing sewage treatment works, health care and medical facilities, increased traffic volume, proximity of site to nearby watercourse and potential wildlife habitat. With regards to agricultural land, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available. The Council would expect developers to make contribution to local facilities, policy BSC 3, should the development place a burden on provision. Measures to minimise any impact on the natural environment and biodiversity will be addressed in line with LDP policy VOE5 'Conservation of natural resources'. Appropriate traffic calming measures could be included within any new scheme. Welsh Water raised no formal objection to the development of the site.

**AHS 05, Land adjacent to Ysgol Pendref (former Ysgol Heulfre), Denbigh**

Site area: 2.82ha                      Indicative capacity: 84 homes

8 responses received, of which 5 were objections

Denbigh Town Council do not raise objection to the inclusion of this site. The exact same objections as site AHS 04 were raised: loss of agricultural land; spread of urban area; lack of brownfield land priority; burden on existing facilities namely existing sewage treatment works, health care and medical facilities, increased traffic volume. With regards to agricultural land, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available. The Council would expect developers to make contribution to local facilities, policy BSC 3, should the development place a burden on provision. Appropriate traffic calming measures could be included within any new scheme. Welsh Water raised no formal objection to the development of the site.

**AHS 06 Land between old and new Ruthin Road, Denbigh**

Site area: 2.09ha                      Indicative capacity: 63 homes

**AHS 07 Land off Whitchurch Road, Denbigh**

Site area: 2.9ha                      Indicative capacity: 87 homes

AHS 06 - 44 responses received, of which 41 were objections  
AHS 07 - 48 responses received, of which 45 were objections  
Two sites have been consulted on in lower Denbigh, which are in the same area on opposite sides of the road. Therefore, most of the comments received applied to both sites and can be considered together.

A high volume of objections have been received in relation to both sites. The Town Council have raised objections on the grounds of traffic, quality agricultural land, environment, additional sewerage capacity, presence of protected species and protection of special character of the local area. Letters from Denbigh residents also echo concerns expressed by the Town Council and additionally raise the following reasons for objecting: utilise brownfield land in the town first (Kwiksave, Woolboard, Middle Lane, NW Hospital), local flooding to parts of road, national insurance company classified the area as flood risk, access via narrow dangerous roads, no jobs in Denbigh, limited play facilities for children in lower Denbigh, limited parking at the Church & Chapel, distance of sites to the town centre and unsafe to walk or cycle to services, no development on green barrier and historic landscape designation, felling of local oak tree(s). Many consider that the distance between the proposed site(s) and the services of the town's high street will generate a significant volume of traffic. There are, however, a number of local bus services within a 200 metre radius of the sites. The Council regularly review all suitable and available brownfield sites [Annual Housing/Employment Land Availability Reports] and can confirm all commitment sites have been previously included in the Plan prior to investigating inclusion of high quality greenfield agricultural land.

Dŵr Cymru Welsh Water raise no objections to connecting to the existing sewer. Detailed site surveys will be required as part of a planning application and only strategic comments have been collected at this stage. There are no records of protected species or habitats on either site, although a wildlife corridor would be retained through both sites. The Environment Agency have raised no objections and there is no flood risk annotated on the TAN 15 maps, however local residents concerns are noted and matters such as surface water flooding would be addressed at a planning application stage.

<b>AHS 08 Adj Glan Ffiddion Estate, Dyserth</b>
---

Site area: 3.2ha	Indicative capacity: 99 homes
------------------	-------------------------------

14 responses received of which 9 were objections

Landscape impact has been the main issue raised, although AONB JAC and CCW raised no objections in principle subject to high standards of design and landscaping. Welsh Water commented that water supply and sewerage capacity are acceptable, improvements may be required to treatment works. There is no objection from EAW on flood risk.

Dyserth Environmental Group objected to green field development, scale of site and impact on infrastructure and open space and disturbance during construction. However, there are few brown field sites available, and

development on green field land is required to accommodate housing needs. The site is adjacent to existing residential development and forms a logical extension to Dyserth, it is close to local services and facilities. Dyserth is designated as a village, without this site the projected growth level would be only 2%, well below the 10-20% growth levels indicated for villages in the Plan. The inclusion of the site will raise the projected growth level to 13% which is an appropriate growth level for a village such as Dyserth. There is a policy in the Local Development Plan which seeks to ensure that all new developments make adequate provision for open space to meet the needs of residents. The proposed allocation is for mixed use including recreation, therefore development of this site should not place additional pressure on existing recreational open space. A construction plan would be required as part of a detailed planning application for the site which would include hours of operation, vehicle routing etc to ensure that disturbance to neighbouring residents is minimised.

<b>AHS 09, land rear of Maes Meurig, Meliden,</b> Site area: 0.87ha                      Indicative capacity: 26 homes
---

9 responses received, of which 5 were objections

This includes a response from Welsh Water raising no objection, and a response from Braidwater Ltd and Jones Peckover. These 2 responses raise objections on the basis of: loss of grade 2 agricultural land; the lack of nearby transport nodes, and because of a concern that the site would not deliver investment in infrastructure or community facilities. It is considered Meliden has a range of facilities, including primary school, shops and pub, employment opportunities, community facilities and bus services. This site would further help the viability of these facilities. Developers would be requested to contribute to infrastructure and community provision through policy BSC 3. With regards to agricultural land, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available.

<b>AHS 10, land rear of Maes Garmon Estate, Llanarmon yn Ial,</b> Site area: 1.14ha                      Indicative capacity: 34 homes
---

15 responses received of which 10 were objections

Objections were raised regarding loss of green belt; highway access; houses already for sale in the area; no one is on the affordable housing register list; sewerage capacity; school capacity; size of site is disproportionate to the village; it will not deliver investment in infrastructure or community facilities; the site is in an AONB; infrequent bus service/car dependent area; and undeveloped planning applications in the area. In response to these concerns, the site is not a green belt, it is accessible, whilst with regards to the affordable housing comment and properties being for sale; the need of these sites follows a request from the Inspector. It is also considered that Llanarmon yn Ial has a wide range of facilities and access to public transport, and that

records show that only 2 dwellings with planning permission remain incomplete. Finally, Welsh Water has raised no objection to the proposal, and the AONB can not be considered an absolute barrier to development providing provision of a satisfactory design.

**AHS 11 Land to north west of Maes Derwen, Llanbedr Dyffryn Clwyd**

Site area: 0.59ha                      Indicative capacity: 18 homes

**AHS 12 Land adj to the Old Rectory, Llanbedr Dyffryn Clwyd**

Site area: 0.98ha                      Indicative capacity: 29 homes

AHS 11 - 24 responses received, of which 21 were objections

AHS 07 - 23 responses received, of which 19 were objections

Two sites have been consulted on in Llanbedr, which are in the same area on opposite sides of the road. Therefore, most of the comments received applied to both sites and can be considered together.

The main points of objection related to compliance with the LDP strategy; lack of highways capacity; lack of footpath; lack of sewerage capacity; school capacity; limited facilities; impacts on neighbours arising from construction; impact on the AONB; and lack for need for additional housing. Officers consider that the sites are compliant with the strategy as Llanbedr DC is a village with several facilities and a regular bus service to nearby towns; no objections have been raised by the Highways Authority, subject to highways improvements and the provision of a footpath; developers will be required to contribute improved infrastructure in line with other LDP policies; the local school has surplus places; construction impacts can be controlled via conditions on any future planning application; the AONB designation is not an absolute constraint and any new development will have to meet high design standards, and landscape protection criteria, set out in other LDP policies; and that the Inspector has identified a need for additional housing sites.

**AHS 13, Land at HM Stanley Hospital, St Asaph**

Site area: 5.74ha                      Indicative capacity: 172 homes

15 responses received, of which 10 are objections

Objections were raised regarding the loss of grade 2 agricultural land and the extension into open land. It is suggested that development of this site in advance of St Asaph Cattle market site would be contrary to policy. However, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available. St Asaph Cattle market is currently in employment use and is subject to flood risk. The site has been dealt with through the Examination process and does not form part of the current consultation.

Objections were raised regarding the distance from public transport nodes. It is also suggested that the site would be unable to deliver investment in infrastructure or community facilities. The site is located off the A525, which is a main link between Wrexham, Ruthin, Denbigh, St Asaph and Rhyl, with a

regular bus service. St Asaph is a town with a range of facilities. Developers would be expected to contribute to any necessary facilities and infrastructure improvements as outlined in policy BSC 3.

Other issues raised include adjacent Grade II listed building, the density of 40-50 dwellings per acre is unlikely to be delivered, and potential to amend the site boundary. An indicative density of 30 per hectare has been applied not 40-50 per acre as suggested. HM Stanley Hospital site is already included in the LDP as an allocation, any development on this site will be required to retain and re-use the listed building, together with protecting its setting.

CCW suggests that the site could offer suitable habitats for Great Crested Newts, badgers and reptiles but this was advisory not an objection. They suggest these matters can be dealt with at the planning application stage. There has been no objection from EAW, and Welsh Water advise water supply & sewerage is acceptable, the sewage treatment works will require investment if all allocations come forward.

<b>AHS 14, Land to the rear of the crossroads and Bron Y Clwyd, Llanfair Dyffryn Clwyd</b> Site area: 1.3ha                      Indicative capacity: 39 homes
---

15 responses received, of which 10 are objections

The site is supported by Llanfair DC Community Council. Objections were raised regarding loss of view from existing homes, loss of agricultural land, remoteness from supporting facilities, main centres of population, main transport corridor and public transport nodes. It is also suggested that the site would be unable to deliver investment in infrastructure or community facilities.

Llanfair DC is a village with some community facilities, including primary school, pub and church and bus services. This site would further help the viability of these facilities. The site is located off the A525, which is a main link between Wrexham, Ruthin, Denbigh and Rhyl. Developers would be expected to contribute to any necessary facilities and infrastructure improvements as outlined in policy BSC 3. The proposal is for a mixed use allocation comprising housing and recreation. With regards to agricultural land, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available. No objection from EAW, and Welsh Water advise water supply & sewerage connection is acceptable, although the sewage treatment works will require improvement.

<b>AHS 15 Land at Wern Road, Llangollen</b> Site area: 0.26ha                      Indicative capacity: 8 homes
--

11 responses received, of which 6 are objections

Llangollen Town Council expressed its support for development on this site throughout the process. Local residents are mainly concerned about the

impact of additional 8 houses on the local road network and impact on the (local) natural environment. Highways consider that this development would only have negligible impact on the existing road infrastructure with site access to be created from existing estate road. Adverse effects on landscape and wild life will be mitigated through applying high quality design in line with LDP policy RD1, Supplementary Planning Guidance Note 26 ('Pontcysyllte Aqueduct & Canal World Heritage Site'), and LDP policy VOE2.

**AHS 16, land adjacent to Dolwar, Pentre Llanrhaeadr**

Site area: 0.28ha                      Indicative capacity: 8 homes

6 responses received of which 3 were objections

Objections were raised regarding highway speed limits; school capacity; linguistic impact; and it being considered the site would be unable to deliver investment in infrastructure or community facilities. Existing speed limits for all A and B classified roads are currently being reviewed. Developers would be expected to contribute to any necessary facilities and infrastructure improvements as outlined in policy BSC 3, and would also be required to submit a Community Impact Linguistic Statement for proposals of more than 5 houses.

**AHS 17, land at Mid Nant Homestead, off Gronant Road, Prestatyn**

Site area: 1.86ha                      Indicative capacity: 56 homes

14 comments received, of which 9 objections

Objections were raised regarding loss of agricultural land, loss of greenfield land ahead of brownfield sites, inconsistency with the Plan strategy, distance from supporting facilities and complimentary land uses, increase in traffic, loss of agricultural land, and it being considered the site would be unable to deliver investment in infrastructure or community facilities. The site is adjacent to existing residential development and forms a logical extension to Prestatyn, it is close to local services and facilities. Prestatyn is designated as a lower growth town, with a good range of facilities and public transport available. With regards to agricultural land, a need for additional housing allocations has been identified and there is a lack of suitable alternative brownfield or lower grade agricultural land available. The site is not within the green barrier and is adjacent to the AONB and in proximity to the Dee Estuary SPA, SSSI and Ramsar site. CCW have highlighted this as advisory not an objection. They suggest these matters can be dealt with at planning application stage.

AONB JAC raised no objections in principle subject to appropriate design and landscaping & provided the allocation would not facilitate proposals to relocate the farm complex to a site which would have an impact on the AONB. The Council would expect developers to make contribution to local facilities, policy BSC 3, should the development place a burden on provision. Appropriate traffic calming measures could be included within any new



scheme. Welsh Water and the EAW have raised no objections to the development of the site.

**AHS 18 land south of Dyffryn Teg, Rhuallt**

Site area: 0.64ha                      Indicative capacity: 19 homes

8 comments received, of which 5 are objections

Responses received were either submitted by statutory consultees, environmental interest groups or agents / companies supporting alternative sites in the County. None were received from residents in Rhuallt. Concern was raised with regard to adverse effects on the Area of Outstanding Natural Beauty (AONB), the surrounding landscape, access to strategic transport corridors, and the lack of existing community facilities.

Rhuallt is a village located just off a strategic highway – A55 trunk road – in the north of the County where the majority of growth in the Plan’s spatial strategy is to be directed. Additional housing may contribute to the set-up of new community facilities in the village. Developers would be required to contribute to infrastructure and community provision in line with the requirements of LDP policy BSC 3.

Landscapes designated because of their particular characteristics and value to local communities in Denbighshire, such as the Area of Outstanding Natural Beauty (AONB), do not preclude development but would require additional attention to design and layouts to ensure that there are no adverse effects. The development here would take place against the background of an existing housing estate. High quality design will be applied to new development in line with LDP policy RD1 (development design criteria) and LDP policy VOE2 (preventing unacceptable harm to the character and appearance of the Area of Outstanding Natural Beauty (AONB)).

**AHS 19 land adjoining Hafod y Gan & former Ysgol Tir Morfa, Rhuddlan**

Site area: 3.45ha                      Indicative capacity: 104 homes

42 comments received, of which 38 are objections

There was a significant response rate from residents in Rhuddlan. The Town Council is not in favour of development on this site. In general, concern was raised with regard to a lack of health care facilities and school capacity deficits in Rhuddlan, the impact on the green barrier between Rhyl and Rhuddlan, increased traffic congestions on local roads, adverse effects on local wild life and habitats, and sewerage capacity concerns.

Additional housing will support existing community facilities, and developers would be required to contribute to infrastructure and community provision in line with the requirements of LDP policy BSC 3. This will include seeking a developer contribution towards any works which may be required at Ysgol y Castell. Site egress / access onto A547 will be achieved via the existing

'Tirionfa' housing estate road. This land is classified grade 2. However, a need for additional housing allocations has been identified. There is a lack of suitable alternative brownfield sites in Rhuddlan, or lower grade agricultural land. Measures to minimise any impact on the natural environment and biodiversity will be addressed in line with LDP policy VOE5 'Conservation of natural resources'. Welsh Water do not envisage any problems with connecting the site with existing sewer, and Rhuddlan WwTW can accommodate additional foul flows.

**AHS 20 Land Adj Maes Hafod, Ruthin**

Site area: 1.98ha

Indicative capacity: 59 homes

7 responses received of which 2 were objections

Issues raised include the loss of grade 3 agricultural land, few brownfield sites are available, housing needs cannot be accommodated without use of green field sites. Potential impacts on water voles and otters has been raised by CCW but this was advisory not an objection. They suggest these matters can be dealt with at the planning application stage. The site is supported by Ruthin & District Civic Association.

There is no objection from EAW, and Welsh Water advise water supply & sewerage is acceptable, the sewage treatment works will require investment if all Ruthin allocations come forward.

**AHS 21 Corner Sydenham Ave & West Parade, Rhyl**

Site area: 0.32ha

Indicative capacity: 26 homes

11 responses received of which 6 were objections.

An objection has been received from EAW on flood risk, however, this is a regeneration site, and negotiations are currently underway with EAW on flood risk in relation to regeneration sites in Rhyl. Welsh Water has no objections  
An objection has also been received from the Town Council on high density development in West Rhyl. However, 4/5 storey development on this site would be consistent with the street scene on West Parade, with potential for high quality self contained development in line with Rhyl Going Forward Strategy.

A further issue raised refers to potential double counting of site with the urban capacity allowance. It is unknown whether the Inspector has already included this site but allocation would add greater certainty of its contribution to housing supply.

**3. COMMENTS ON DRAFT PHASING POLICY**

11 representations received including 9 objections, neutral comment from CCW, and objections from HBF, Anwyl and landowners.

**Consider that the additional sites should form part of main supply and not be restricted to last 5 years of Plan. The delivery of all these sites within 5 years is also questioned.**

The additional sites did not feature in the Deposit LDP, therefore it is considered appropriate to guide their delivery to the later phase of the Plan period. Sites vary in size and market location and Council is confident that they can be brought forward, if required, within the Plan period.

If all 21 sites are released in 2016 unlikely that they would all be subject to planning applications and building simultaneously due to their varying locations, sizes and localised considerations.