

West Rhyl SPG consultation summary, appendix 2.

- Additional text added to WR SPG is shown by a **highlight**.
- Text removed from the WR SPG is shown as a ~~strike through~~.

Representor	Summary of comments	Council comments
1. F.Clancy, 24 River Street, Rhyl, LL18 1QT	West Rhyl is already surrounded by green space; drift park, children's playgrounds, formal games area, a MUGA on Gordon Avenue, the beach and empty sites immediately behind Aquarium Street and facing the promenade. New open space therefore not needed. Refurbishment instead of demolition and use of the vacant West Parade/John Street site as a green space with links to Drift Park. Refurbishment would preserve and enhance the historic environment and would enhance this tourist area and promenade. New type modern houses would be inappropriate in the heart of a tourist area.	It is considered West Rhyl needs a broad range of green space to cater for the breadth of leisure activities identified by residents (see appendix I of the SPG for details). The proposed open space would be a community resource which would help to catalyse investment in the surrounding area. The intention is to use existing seafront sites to promote development, encourage visitors and provide protection from the elements for inland areas.
2. M. Rehan, 24 River Street, Rhyl, LL18 1QT	'There should not be any demolition in West Rhyl. We always talk about shortage of the houses in Britain and West Rhyl is already struggling to make its image. Nobody would come into the streets to see the green space.' Suggests refurbishment of houses on Aquarium and Gronant Street for better living instead of demolition.	Comments noted. The SPG already proposes the refurbishment of a large number of existing properties. Properties proposed for demolition are considered to be of an inadequate living standard and of little architectural merit. Furthermore, the clearance of residential properties in the Gronant Street area will help provide a strongly desired community open space which has been requested by residents during previous masterplanning and consultation.
3. Hawkins (via email), 13 Butterson Road, Rhyl, LL18 1RB	' No more flats in the form of bedsits. All three storey houses made into max 3 flats of good proportions as some of these houses have 5 or more flats of good proportions as some of these houses have 5 or more flats causing overcrowding and the increase in waste is not managed correctly noise is also an issue. All sea fronted properties to be painted white or all the same colour all landlords to be managed in the upkeep of	Comments noted. The SPG seeks to ensure that refuse storage is incorporated into the existing curtilage of residential properties. Broadly speaking, the SPG seeks to reduce the density of residential units in the area. Any proposals for flats would have to comply with residential space standards outlined in the Council adopted Supplementary Planning Guidance note 7 document.

	<p>there properties. No outside bins on road all bins to be emptied from the back of properties. There is no room for bins in the front of houses or flats. No pets in flats.'</p>	<p>Uniform frontage treatments may stifle the opportunity for innovative design and use of energy efficient materials.</p>
<p>4. John Owens Solicitors, Hanover House, The Roe, St.Asaph, Denbighshire, LL17 0LT</p>	<p>'I am the owner of 27 Aquarium Street, which is a building subject to Compulsory Purchase, to facilitate the Regeneration. Whilst I take no issue with the plans as a whole, I do take issue with the lack of information provided at the outset. I learnt that my building would be demolished on "facebook" and after I had spent a considerable amount of money on the building as directed by the Council to meet HMO regulation. I have issued a formal complaint about how I have been dealt with and the length of time it is taking to resolve. Whilst the proposals are agreeable, I feel more care must be taken to protect the owners of the properties affected.'</p>	<p>Comments noted. The formal complaint is subject to separate attention and will be dealt with accordingly.</p>
<p>5. Nigel Winnan, Wales & West Utilities, Wales & West House, Spooner Close, Celtic Springs, Coedkernew, Newport, NP10 8FZ.</p>	<p>A letter which encloses an extract/map of the mains records of the area covered by the West Rhyl SPG with a comprehensive list of general conditions.</p>	<p>Comments and map noted.</p>
<p>6. Rhyl Town Council (via email), Civic Offices, Wellington Community Centre, Wellington Road, Rhyl, Denbighshire, LL18 1LE</p>	<p>' I can now confirm that following the pre-consultation event at Russell House and subsequent formal consideration at Committee, the Town Council wish to raise no objection to the above document'.</p>	<p>Support welcomed.</p>
<p>7. R.Maher (via email)</p>	<p>'Why does the SPG boundary exclude properties at 3&5 Butterson Road? This is constantly in dire/poor state with frequent visit by local authorities including police. This area is not pleasant for the senior citizens in the new OAP retirement home and because of the run down state attracts the undesired behaviour that this type of area normally attracts (eg - fly tipping, derelict cars and properties drop-off area, urination, etc). It would much appreciated if the front end by promenade of Butterson road is included in the SPG and some plans are put in place</p>	<p>A boundary discrepancy has been noted and will be amended to include these properties on the following plans: SPG boundary map Figure 1, indicative landuse plan figure 2, Adopted alleyways figure 3, Conservation area Figure 4, Development framework figure 5, routes & access figure 6, parking figure 7, frontage treatments figure 8, green space figure 9, public realm figure 10.</p>

	to bring this up into a reasonable state of cleanliness and appearance.'	The SPG seeks 'Secure by Design' standards to help manage out the antisocial behaviour issues.
8. Wendy Richards, Design Commission for Wales.	<p>The comments from DCFW have been arranged under the following themes</p> <p>Vision and Development Framework</p> <ul style="list-style-type: none"> • Vision too wide ranging • Section 4 should be restructured to improve the flow • The Need for a New Approach outlined on page 23 is unsupported by any evidence • No evidence that alternative strategies have been considered. <p>Policy and Regeneration Context</p> <ul style="list-style-type: none"> • no reference to Welsh Government National Planning Policy Wales or the strategic regeneration proposals outlined within the North Wales Coast Action Plan and various development briefs. 	<p>It is considered that the vision is appropriately broad to reflect the complex needs of the area.</p> <p>Comments noted. However it is considered that starting this section with the vision ensures that the development framework logically flows from a more strategic overview of the SPG area.</p> <p>A number of studies highlight the catalyst role green space plays in leveraging investment and in ameliorating public health issues. 'A Faculty of Public Health report <i>Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing</i>' produced in collaboration with Natural England, details the benefits compiled from a wide range of research. A copy of the report can be found on the following link: http://www.fph.org.uk/uploads/r_great_outdoors.pdf</p> <p>A range of strategies for the area have been considered as part of the masterplanning work carried out in 2010 (see appendix I). Green space is one part of the overall strategy for West Rhyl.</p> <p>The need for a reference to National Planning Policy is noted and the following text will be added to section 2.1:</p>

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government (WG) supplemented by a series of topic based Technical Advice Notes (TANs) which provide more detailed guidance. Sustainability and the need to address climate change are critical drivers which underpin planning and land use policy in Wales. The following table provides a list of technical advice notes which are particularly relevant to West Rhyl.

<i>TAN 12 Design (2009)</i>
<i>TAN 13 Tourism (1997)</i>
<i>TAN 15 Development and Flood Risk (2004)</i>
<i>TAN 16 Sport, Recreation and Open Space (2009)</i>
<i>TAN 18 Transport (2007)</i>
<i>TAN 22: Planning for Sustainable Buildings (2010)</i>

TAN Guidance relevant to development within West Rhyl

The document is based on an assessment of urban form. The SPG requires new development to be energy efficient and achieve carbon neutrality where possible. The design of low carbon buildings and the achievement of BREEAM ratings will require detailed, site specific consideration of microclimatic issues.

This area is not considered appropriate as the heart of the scheme. It currently serves more as a network of routes. Ultimately, frontage treatments and public realm works will help to improve this location in order to draw people in to West Rhyl.

A Green Infrastructure Project is currently being undertaken by TEP for North Wales and the North West area which includes more detailed assessment for Rhyl. Any recommendations from this could inform the future design of the public realm and how to better help

Urban Design

- Need detailed analysis of the urban form, physical characteristics and microclimate.
- Area identified as having '5 way views' into the town and to the sea front should be the 'heart' of the scheme.
- Suggests that a review of Rhyl's green infrastructure is undertaken to inform a strategic approach.

	<p>Access and movement</p> <ul style="list-style-type: none"> • Drawings do not show how movement to and from the seafront is encouraged. <p>Open Space</p> <ul style="list-style-type: none"> • The size of the proposed space is difficult to gauge without scale drawings but seems substantial when compared to Drift Park to the North. What has determined the size and use of this area? This reason should be articulated alongside the supporting evidence. • An identified revenue source will be needed to provide continued maintenance and management of the hardworks and planting proposed. <p>Public Art</p> <p>- The relevant professional advisors on such arts strategies should form part of the design team and process</p> <p>Energy Efficiency</p> <ul style="list-style-type: none"> - Appendix 2- Reference to Warm Wales www.warmwales.org.uk may be appropriate here. 	<p>connect the proposed open space to the surrounding green infrastructure.</p> <p>The access and movement framework outlines pedestrian routes. Detailed development briefs will be published for sites as they come forward for development.</p> <p>The scale and use of the open space will be determined through a strategic assessment of need based on community consultation. Previous consultation has highlighted range of needs as detailed in the SPG (see appendix I, paragraph 1, page 47).</p> <p>Denbighshire Council are aware of the long term costs needed to maintain the quality of park and public realm environments and will work collaboratively to ensure an appropriate strategy is in place.</p> <p>Comments noted, these skills will be included when considered relevant.</p> <p>Agreed. The following paragraph will be added to appendix 2, page 49 as follows:</p> <p>Warm Wales</p> <p>Warm Wales-Cymru Gynnes was set up in 2004 by National Grid, with a specific aim to meet its corporate responsibility to Government and deliver benefits to 1 million fuel poor homes. Warm Wales are able to access grant aid under Carbon Emission Reduction Target (CERT) and Community Energy Savings</p>
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		<p>Programme (CESP). For further information, please visit the website:</p> <p>http://www.warmwales.org.uk/lang/en-gb/</p>
<p>9. Environment Agency, Llwyn Brain, Ffordd Penlan, Parc Menai, Gwynedd, Bangor, LL57 4DE</p>	<p>- Note the majority of west Rhyl is residential and lies within flood zone C1; it is only the most easterly section that is outside the zone. All planning applications in the flood zone area will need to be accompanied by a Flood Consequence Assessment but in many cases this may be limited. Would advise against a change from high vulnerability to low vulnerability development.</p> <p>- Suggests the Council consider producing further flooding guidance and a community flood plan for the area.</p> <p>- The regeneration of area will provide an opportunity to reduce the flood risk by providing buildings which have flood resilience incorporated into their design, which will provide better protection for the occupants.</p> <p>- Note that the plan involves creating a green space in the centre of the area and a general lessening of the density of development, which is to be welcomed.</p>	<p>Comments noted.</p> <p>The Council have already produced an SFCA that has been used as evidence for the LDP. The Council will give consideration to supplement the SFCA with more localised data to reflect recent flood defence works in Rhyl. To alert potential applicants to the potential future publication of flooding guidance for the West Rhyl SPG area, it is proposed to amend and add the following text:</p> <p>6.5 The SPG area of West Rhyl is in an Environment Agency designated C1 Flood risk zone. Development in these areas will only be permitted where it can be demonstrated to provide an employment or regeneration objective (see TAN15). Development which accords with this SPG will be considered to meet the necessary regeneration / employment objectives. In conjunction with the Environment Agency Wales, the Council are currently considering producing further guidance on this matter.</p> <p>Comments noted.</p> <p>Comments noted.</p>

<p>10. CADW</p>	<p>Although we have some reservations about the approach to regeneration in West Rhyl (in particular the use of demolition to create open space, which will bring its own urban design challenges if it is to be successfully integrated), we welcome the use of SPG to support regeneration activity here. Also welcome the broad recognition this document gives to inherited character.</p> <p>Consider the historic environment should be acknowledged further by recognising that the conservation area and listed buildings are positive attributes of the area instead of being seen as ‘constraints’. This would match the approach from the nearby THI.</p> <p>It would be helpful to acknowledge the importance of appropriate care and enhancement of existing buildings which are fundamental to the value of the area.</p> <p>It will be particularly important to ensure that conversion really does respect the positive attributes of character, and that energy efficiency measures are compatible with both the character and performance of existing buildings.</p>	<p>Comments and support welcomed.</p> <p>Agree that the conservation area and listed buildings should not be labelled as constraints. The Strengths, Weaknesses, Opportunities and Constraints table on page 22 will be altered as follows:</p> <p>‘Constraints The conservation area status and the presence of listed buildings’</p> <p>As the SPG is planning led, comments regarding building maintenance are considered outside the scope of the document.</p> <p>Enhancement of historic buildings are already encouraged through existing national and local planning policy</p>
<p>11. Red Property Services, The Edge Business Centre, Clowes Street, Manchester, M3 5NA.</p>	<p>Given the location of the Ocean Plaza Site within West Rhyl and the significant contribution it would make to a number of regeneration aims and statutory and non-statutory development plans, consider the West Rhyl SPG area should be extended to include the Ocean Plaza Site.</p> <p>Traditionally, the area of ‘West Rhyl’ is taken as containing the Lower Super Output Areas of West Rhyl 1, West Rhyl 2, and West Rhyl 3 and we consider that the inclusion of all three of these Lower Super Output Areas should be included within this SPG.</p> <p>A Masterplan Design Code is to be submitted with the Ocean Plaza planning application, and the principles in this design code could be included within the SPG if the West Rhyl area is extended.</p>	<p>Comments noted. The West Rhyl SPG focuses primarily on the West Rhyl Housing Improvement Project and immediate vicinity. It is considered that enlarging the SPG area would reduce the ability to focus and harness the benefits and investment involved from the West Rhyl Housing Project. Furthermore, the characteristics of the ‘gateway’ Ocean Plaza site are considered to be quite different to the more residential character of the West Rhyl SPG area.</p>

<p>12. Julie Cipriani (via email)</p>	<p>Offers a number of suggestions based on experience of living on John Street, Rhyl. Suggests:</p> <ol style="list-style-type: none"> 1. 'Demolish old housing stock 2. Damp proof new housing. 3. Less flats and more 1 &2 bedroom housing and do away with inadequate bedsit arrangement. 4. If there are flats ensure private garden, ventilation, window in communal area/stairway, a window in the bathroom, sound proofing, quality insulation. 5. Take power of rental market away from landlords and agents and have them run by regulated housing association(s). 6. More natural surroundings, trees, greenery. 7. Do away with confining studio flats. 8. Quality materials for the construction and building, rather than the usual cheap paper thin walls which are not energy efficient, allow heat to escape(increasing bills) and are prone to damp and causing cold conditions in the property. 9. Seek reliable references from potential tenants as anti social behavoir from rowdy and abusive tenants has been a long term problem and the reason I have moved on most occasions,as i have been kept awake all hours, threatened and denied quiet enjoyment of the property and surroundings.' 	<p>Comments noted. The SPG will seek to ensure that new housing and renovation projects will provide high quality homes that are environmentally efficient and in accordance with the latest building regulation standards. The SPG also intends to increase the greenery in the area through provision of a new open space and public realm improvements. The introduction of new owner occupied family homes into the area will reduce the number of rental properties in the area. Rhyl Going forward meet regularly with the Landlord Forum to discuss issues</p>
<p>13. Mr Klaus Armstrong Braun (via email), EU Envirowatch</p>	<p>The representor forwarded comments made previously on the Knutsford Town Strategy, Macclesfield Town Strategy. Endorses both approaches, in particular the Knutsford Town Strategy for the West Rhyl SPG. The response states:</p> <p>'I 'speed' read the document and make the following submission:</p> <ol style="list-style-type: none"> 1. Having read the docu, I came to the conclusion that the East Cheshire Knutsford Town Strategy would help tremendously in improving the SPG as the Strategy is same as a SPG covering same areas. <p>The Strategy goes into more fine detail missing in the SPG in many areas.</p>	<p>Comments noted. Combined with the nearby public transport facilities, the indicative car parking space proposed in the SPG is considered to make efficient use of available land.</p> <p>We have reviewed the Knutsford Town Strategy and feel that the West Rhyl SPG contains sufficient detail appropriate to the nature of the area. Appendix I of the SPG refers to the detailed background documents which inform the SPG.</p>

	<p>2. Enviro Watch EU comments on the Strategy also are relevant to the SPG and want them to be considered formally.</p> <p>3. Enviro Watch EU Objects to the Parking Policy as there is no policy on Car parking RACKING system which is more sustainable with less land take and Vehicle pollution.'</p>	
<p>14. D Bodell, 42 Viola Avenue, Rhyl, LL18 2NF</p>	<p>'Please use common-sense on this project and also use tax-payers monies wisely.- Rhyl is crying out for re-development and re-generation to take this area of N Wales forward into the future.'</p>	<p>Comments noted</p>
<p>15. Carol Smith, Rhyl THI Project Manager</p>	<ul style="list-style-type: none"> • The land use plan should contain listed buildings • Conservation Area designations require clarification and correction on plans • Terminology within sections of the text is incorrect and needs amending 	<p>Agreed these buildings will be shown on the plan</p> <p>Figure 4 in the SPG is a map specifically for the two conservation areas and listed buildings.</p> <p>It is noted that section 3.13 (p.14) is contradictory and will be amended accordingly:</p> <p>The building scale and massing is a mixture of 2, 3 & 4 storey buildings, many with large outriggers. The high density and dominant scale of terraced housing adds a significant and distinct 'enclosure' to some streets. Abbey and Edward Henry Streets are considered important in design terms as they have a strong individual character. The Gronant Street block is an exception in terms of its scale and massing being two storey in character.</p> <p>Section 3.23 (p.18) will be amended accordingly:</p> <p>The built environment contributes to opportunities for crime and anti-social behaviour due to the proliferation of alleyways, and a lack of external amenity space and resulting in poor natural surveillance.</p>

- Council is demolishing a building which has been identified within the document as worthy of retention

Refurbishment/ improvement

The schemes earmarked for this should be given more prominence within the document and promoted as exemplars

The Conservation area map Figure 4 (page 19) will be amended to distinguish the two conservation areas. Two additional images will be added, one to page 20 and one to page 21 to illustrate the River St Conservation Area and listed buildings

The existing images on pages 20 and 21 will have their captions amended to denote the buildings are within the Rhyl Central Conservation area.

Text in section 3.26 (page 20) will be replaced by:

Within the Rhyl Central Conservation area some houses are rendered with features such as cill bands, architraves, pilasters and quoins in evidence. Red brick was used for the works building in Bedford Street and yellow brick was used for the later housing in Edward Henry Street, the latter being decorated with terracotta panels. Some of the houses in this area are raised above street level over semi-basements with the survival of cast-iron railings.

The River Street Conservation area is characterised by 3 storey yellow brick, bay fronted properties on River street with four storey, listed, yellow brick properties on West Parade. These properties have characteristic terracotta panelling and cill bands.

The Honey Club building is being demolished on health and safety grounds – reference to this building will be deleted (page 21) as follows:

~~21-24 West Parade and 2-4 Crescent Road where redevelopment in the 1930s introduced Art Deco detailing including steel windows and curved glazing~~

It is considered that refurbishment opportunities are referred to within the development framework table, plan and text. As yet there is no exemplar to reference.

	<p>Open space</p> <ul style="list-style-type: none"> • No proven benefit that one large green space will attract private sector housing • Better to promote private garden space <p>Housing size, scale and configuration</p> <ul style="list-style-type: none"> • 3 storey 3 bed family housing impractical for families with small children • noise and nuisance and issues likely • de-densification could be more easily achieved through modification of existing buildings and removal of outriggers and redesign of internal space standards/number of bedrooms • Families should be allowed to over-occupy larger housing <p>Financial Incentives for redevelopment</p> <ul style="list-style-type: none"> • should offer financial support to private owners to reconvert properties <p>Boundary definition</p> <ul style="list-style-type: none"> • west end of area has no proposals for redevelopment. If nothing is proposed, why is it included in the Design Guide area? <p>Parking</p>	<p>The document references the need for both new public open space and private external space. A number of studies highlight the catalyst role green space plays in leveraging investment and in ameliorating public health issues. 'A Faculty of Public Health report Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing' produced in collaboration with Natural England, details the benefits compiled from a wide range of research. A copy of the report can be found on the following link: http://www.fph.org.uk/uploads/r_great_outdoors.pdf</p> <p>These detailed matters are considered to be more appropriately handled at the planning application and building regulation stages where more bespoke solutions to reflect the variety of housing designs in the area could be effectively identified.</p> <p>It is envisaged that some de-densification will occur through the conversion and modification of existing buildings</p> <p>Proposed changes to the Welfare benefits system will have an impact on the size of accommodation social housing tenants are permitted to occupy</p> <p>This document intends to provide planning guidance for the West Rhyl area rather than offer financial support for individual private development proposals. However, the document could be a useful tool in securing future public funding.</p> <p>This area benefits from a higher quality urban fabric and presence of street trees. The document provides general guidance for the area, and intends to encourage owners to take up energy efficiency improvements and to convert out of multi occupancy</p> <p>A range of parking options have been put forward for the</p>
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- car parking courts are not generally considered to be as safe, secure, pleasant, or practical as individual or on-street parking,
- parking should be designated to improve 'ownership'.
- will hotel guests expect dedicated parking?

Urban Design

- Section 5.10: is very prescriptive.
- Must ensure that all developers make use of good architects (definitely *not* design and build)

Material palette

regeneration area including improved on street facilities and courtyard parking. The preferred use for the site behind the Honey Club is now to retain pay and display parking. The following changes are therefore proposed:

Insert for Table 1 (page 27)

Proposed Land Use

Preferred use

Public car park

Acceptable Use Class

Sui Generis

Use of site as pay and display car park

Development Principles

Car park enhanced and retained to compensate for the loss of spaces on the promenade

Justification

Loss of existing car parking is likely due to proposed new swimming pool destination attraction next to the cinema in the coastal tourism zone facing this site.

Section 5.10 will be modified to read:

'~~must~~ **should ideally** form a continuous building plane ~~with no~~ **which avoids** random setbacks or stepped articulation'

Developers are encouraged to discuss development proposals with the local planning authority to develop designs appropriate to the site prior to the submission of planning applications.

Section 5.14 asks developers to respect the local context of

- Section 5.14: - traditional roofing is slate but many houses have been re-roofed in cheap modern alternatives, guidance in document will replicate this
- Photo is a bad example of material range
- LA should define a palette for public realm and street furniture

Energy-efficiency

- Section 7.5: some energy-efficiency measures can be harmful and should *not* be acceptable.

materials. We do not propose to specify traditional slate as the choice of materials will depend on the locality.

Comments noted, however it is considered that the photo in section 3.20 (page 17) clearly demonstrates a range of existing colour paletes and materials in this area of Rhyl

Public realm improvements can be carried out without the need for planning permission, so determining the design of street furniture falls outside the control of the SPG. However, it is intended that the council will implement high quality matching public realm improvements throughout the SPG area.

Energy efficiency measures will need to be site and building specific.