

**Denbighshire LDP**

July 2008

**Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

<b>Self-assessment based on the soundness tests Preferred Strategy stage; - LDP Manual 6.5.1)</b>	
<b>P1 - Prepared in accordance with the Delivery Agreement including the CIS</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
It is noted that the Preferred Strategy has not been prepared in accordance with the original Delivery Agreement insofar as the timetable and elements of the consultation arrangements have been revised. It will be important to be able to demonstrate that the consultation arrangements employed have been equivalent to or improved on those in the original agreement.	Ensure equivalent or improved engagement and consultation has taken place and that the timetable does not need to be revised again.
<b>P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<b>SA/SEA:</b> We note that: the Preferred Strategy has been subject to SA/SEA. It is not always clear in the preferred strategy document how the SA/SEA has influenced the selection/refinement of preferred options.  <b>Habitats Appropriate Assessment (HRA):</b> We note that the Preferred Strategy has undergone the first stage of the HRA assessment in discussion with CCW.	N/A

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**C1 It is a land use plan, which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.**

<u>Comments</u>	<u>Suggested Actions</u>
<p>The national, regional and local policy framework within which the Preferred Strategy has been prepared is identified, with particular emphasis on the regional picture. However, it is not clear how some of the regional issues identified have been taken into account (e.g. Conwy's potential inability to meet its housing apportionment requirements) (PR).</p> <p>Whilst there is mention of some relevant plans and policies at paragraph 4.1.1 there could be a greater recognition of the link between planning and other areas of service delivery by the council itself, adjoining authorities and bodies such as EAW (JS).</p> <p>For example, whilst evidence has been collected in regard to flood risk and it is clear that this has shaped thinking on the allocation of key sites, the relationships and synergies between the preferred strategy and the flood risk and coastal protection agenda could be explored. For example the impact of Shoreline Management Plans (Round 2 to be completed by 2011) and catchment flood management plans (due to be completed March 2009) and local pilots such as the one in Prestatyn exploring how surface water flooding can be better managed. These relationships may be a key factor associated with the long-term adaptation capability of people and places to climate change and could be built upon as part of the implementation and delivery of the plan for the benefit of communities concerned (JS).</p> <p>There is little specific reference to water/sewerage infrastructure. Generally, paragraphs 5.11, 7.2.14 recognise that infrastructure should be delivered early, and at a stakeholder meeting DC/WW state that if they have early notice then there is unlikely to be a problem in terms of capacity. However, this issue should be explored further. See comments on Infrastructure under C2 (JS).</p> <p>It is noted that the Regional Transport Plan has not yet been finalised. The LPA should ensure that the Strategy is consistent with interim/emerging drafts and is flexible to enable RTP plans and programmes to feed into it when they come forward.</p> <p><b>See under CE 1/CE2</b></p>	<p>Ensure that it is clear how the contextual strategies have influenced the Preferred Strategy.</p> <p>Ensure evidence is provided on all areas of joint working both within the authority and external organisations</p> <p>Ensure strategy is sufficiently flexible to accommodate emerging flood risk appraisals.</p> <p>Explore infrastructure delivery implications further.</p>

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File Ref: APP 30 1 009

Annex to letter

<b>C2 It has regard to national policy.</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<p><i>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</i></p> <p><b>Best and most versatile agricultural land:</b> Planning Policy Wales, paragraph 2.8.1 - Conserving the best and most versatile agricultural land (BMV - Grades 1, 2 &amp; 3a). Extensive survey work has been undertaken has confirmed that significant areas of BMV land are present throughout the county. Such land has been noted as present within 2 of the 3 key strategic settlements noted within the Strategy. (Rhyl &amp; Bodelwyddan)</p> <p>The Council's preferred strategy and key site requirements are not entirely clear consequently in strategic terms it is considered that the options chosen by the Council are potentially in conflict with Policy PPW 2.8.1 However we cannot confirm this until the Council clarifies the total amount of land to be taken or which site/sites are favoured.</p> <p>To this regard the Authority must ensure that in considering the options that only land which is necessary for development within the plan period is allocated and that as stated within the policy that land of grades 1, 2 and 3a is only developed if there is an overriding need for the development and either previously developed land or land in lower agricultural land grades is unavailable.</p> <p>Land Supply - Paragraph 5.3.2 of the Strategy implies that there is potential to locate some development on brownfield land, but without any further detail. The extent or otherwise that Brownfield land can contribute to Plan objectives will be a relevant matter during the application of the policy</p>	<p>Review, refine or supplement the strategy and deposit plan proposals to reflect national policy were appropriate.</p> <p>Complete urban capacity study for appropriate settlements</p>

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referred to within PPW 2.8.1 and therefore should be quantified and assessed to ensure that best and most versatile agricultural land losses are minimised.

**Housing:** The guidance in MIPPS 01/2006 (*Housing*) appears to have been followed, including accommodating the regional apportionment of the Assembly Government's household projections. Although member commitment at regional level should be obtained and emerging unitary projections should be tested and the implications identified.

It is not clear whether the issue of affordable housing has been adequately addressed. In particular the deliverability of the proposed affordable housing needs to be clarified - it is not clear how the target of 2,250 - 3,000 affordable homes will be delivered from the additional housing proposed, given the number of existing commitments (PR).

The affordable housing target seems to be a product of the proposed overall housing supply rather than an evidence-based objective in itself. The target should be clearly derived from the housing needs identified in the Local Housing Market Assessment (TAN 2, para. 9.1)

How will the affordable housing element within local service centres be apportioned? Through site thresholds or quotas for sites?

**Employment:** The consideration given towards the future allocation of employment land appears to be in accord with national policy, contained in PPW. Denbighshire Employment Needs Study 2007 provides evidence in support of the preferred option of medium growth. Sustainability of employment land allocation has been considered in relation to other land uses, and awareness of economic issues in adjoining authorities is referenced. Potential strategic sites are identified. Consideration is also given to growth in smaller settlements and rural areas. It will be important to be able to elaborate on the 50% of existing employment sites that are considered to be severely constrained.

**Retail:** Retail proposals are broadly in keeping with PPW. The retail hierarchy is described and indicates where the main growth areas are. An evidence base is provided by the Denbighshire Retail and Leisure Study although it is stated that further work is required prior to the Deposit LDP. Further detail building on the previous study would be anticipated to flesh out policies for retail centres within the authority at the Deposit stage.

The housing figure in the deposit LDP will need to be justified on the basis of evidence

The deposit plan must be clear about housing need; it must identify an affordable housing target based on local empirical evidence that is deliverable.

The deposit plan must be backed by review evidence that the use of existing allocations is appropriate, and that these are in line with the plan's spatial strategy and objectives. There will also need to be evidence that any windfall element is realistic and will be delivered over the plan period.

Timing and phasing of housing sites should be considered for the deposit plan.

Although awareness of economic issues in adjoining authorities is demonstrated it will be important to reconcile employment forecasts and allocations in the light of prevailing circumstances.

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National policy in respect of town centres and uses best located in town centres will need to be considered in respect of the composition of the large out of centre mixed use sites proposed.

**Rural Issues:** Rural issues are considered and reflect policies set out in PPW but need further elaboration at the next stage particularly the rural urban relationship.

**Climate change adaptation/mitigation:** The findings and issues arising from the SEA/SA do not seem to have been followed through in the preparation of the preferred strategy. Although there are policies on flooding and energy efficiency these are not set within the context of climate change which means there is a lack of context for development both in terms of mitigation and adaptation. For example, the preferred strategy does not explicitly mention adaptation responses to climate change. However, the linkages between this key overarching issue and the approach taken on strategy in terms of the consideration of flood and coastal risk could be usefully made without implications for the plan/approach. See other comments under C1 and CE2 on opportunities for collaboration and enhancing resilience

Policies 3, 6 and 10 miss the opportunity to reinforce how development can be used to achieve win-win solutions on biodiversity and connectivity, water management, soil protection, landscape protection, safeguarding air quality, including the supply of renewable and low carbon energy and sustainable and low carbon buildings as part of an integrated approach to site selection and design. More consideration could be given to the evidence in the Jba Report on localised flooding and suitability for Suds in the context of the overall strategy).

Design objectives and policies should recognise the implications of climate change (reference to MIPPS 01/08 and current consultation on TAN12).

The LPA will need to be aware of the outcomes of the 'Further consultation on Planning for Climate Change' on the draft MIPPS (12/06) with regard to Policy 6 and their approach to sustainable buildings and low and zero carbon developments.

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**Flood and coastal risk:** The strategic approach taken towards flood risk is considered to be in accord with national policy. The evidence base with regard to flood and coastal risk (SFCA) has been used to shape strategy, and in particular, the identification of key areas where growth will be provided for. These areas are largely located outside of the floodplain and this is supported. In other key settlements identified for growth, flooding issues are identified and understood and it is largely demonstrated in the evidence base that sites can come forward in an acceptable manner. It will be beneficial to match up the evidence obtained on flooding consequences with an understanding of infrastructure / mitigation measures required to ensure delivery, as well as the means by which these could be secured and whether opportunities for enhancing resilience could be secured. (see CE 3) This could be assisted through appropriate collaboration with drainage /flooding and coast protection colleagues within the CC and with external organisations such as EAW.

Other comments made on resilience to the effects of climate change and where synergies with other agendas could be further explored are also relevant considerations.

The presentation of the regeneration of Rhyl town centre/waterfront (Ocean Plaza Site etc) and flood risk in the plan is more vague and Policy 10 Key Areas of Protection, criterion d) appears not in accord with national policy

**Water, sewerage and drainage infrastructure:** The position in terms of water infrastructure is not referred to in the preferred strategy. It is recognised that all infrastructure should be delivered early (paragraphs 5.11 and 7.2.14) and it is inferred that existing infrastructure is likely to be adequate to deliver the preferred strategy. This is based on comments by DC/WW in a LDP stakeholder meeting. However, this seems to be subject to DC/WW being given “adequate notice”. This issue should be further explored in the context of national planning policy, which states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. See CE3

**Minerals:** Section 5.8: The potential of and provision for recycling C&D waste and the use of slate waste should be considered in the context of policy 15.

The proposals identify that the majority of mineral working happens in the AONB. Whilst no hard rock allocations are needed in this plan, this might be the time to flag up that – if this is the intention – minerals working will over time be expected to move away from the AONB? To make such a statement, the authority will need to evaluate other potential resources and their environmental impacts

Avoidance of flood risk areas should be followed through into the deposit plan.

Whilst it is unnecessary to directly reiterate national policy, the local implications of how infrastructure capacity and provision impact on preferred strategy, timing and delivery should be clearly outlined.

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(CW).

Policy 13 (Minerals): The policy refers to regional and local demand, defining regional as the 6 local authorities of north Wales plus the Snowdonia National Park Authority. Denbighshire also sends certain minerals further afield and should continue to make provision for that wider market, subject to the environmental considerations identified in the MTAN.

Under safeguarding, it is not clear what is intended by “local” hard rock.

No. iv) identifies the environment, amenity and transport impacts as criteria to be considered in determining safeguarding areas. Whilst the environment is identified in MPPW policy, attention is drawn to the line that has been consistently followed re safeguarding still being required within environmentally designated sites. Amenity and transport are not issues to be considered at this stage – they would be assessed at the time that it became necessary to make provision for new sites or extensions. “Areas” for safeguarding would be more appropriate than “sites”.

The plan is committed to sustainable mineral development. For sand and gravel now, and as a flag for future hard rock development, it may be appropriate to consider the transport routes for minerals and the potential environmental and amenity impacts with reference to designating areas of search etc.

**Waste:** Waste and making adequate provision for all waste streams.

Reference is made to the North Wales Regional Waste plan, the need to identify suitable sites for waste management facilities and that local need requires consideration. It is generally proposed that 10 ha of land will be allocated for local facilities and 9ha for sub-regional facilities. This is generally supported, however, there should be no doubt as to the importance of making this provision explicit and specific in the LDP. It is stated in the plan that sites for in-building waste management facilities will be generally acceptable on industrial estates and open air facilities will be acceptable in areas with existing agricultural use, with both types of locations being appropriate for AD and in vessel composting. However, it will be of concern if actual locations are not specified in the LDP in accordance with TAN 21 and the policy clarification note.

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The location of sites suitable for waste management facilities of a sub-regional scale are considered to be strategic issues and should be identified as part of the preferred strategy. This is particularly important given the lack of clarity in the preferred strategy surrounding the nature, extent and location of the employment land bank and what is genuinely available. Hence it is not clear how the provision of land for waste facilities relates to the overall approach to employment land. Also, that the growth strategy emphasises the importance of mixed use as a mechanism for bringing forward development further confounds the position. The relevance and impact of this on the ability of the County to contribute to the provision of an adequate network of facilities is not adequately considered as part of the options or preferred strategy.

There is a need to be more specific about the context for waste – to cover the implications of the RWP for Denbighshire, the existing position on capacities (including the lack of landfill across the north Wales region) and the capacities being planned for. As part of the preferred strategy the location and suitability of the 9ha proposed for regional and sub regional sites should be demonstrated. As a minimum, strategic policies should clearly indicate where there are suitable and available locations for waste management facilities of a regional/sub-regional scale. It should also be clear how provision will be made for securing 10 ha for local waste facilities as part of the overall preferred strategy. Finally, whilst it is acceptable for more detailed policies, as appropriate, to come through in the deposit plan, there is at present little guidance within the plan itself as to what these may cover.

**Landscape and biodiversity:** Policy could address the wider spatial element of landscape (and habitats and biodiversity) protection and enhancement, to ensure physical linkages within and between Denbighshire and adjacent counties.

Additionally linkages between landscape and tourism, regeneration and business location decisions could be made.

It may be possible to identify specific approaches to landscape protection and enhancement linked to the spatial strategy.

**Gypsies and Travellers:** Chapter 9, policy 5 on page 80 addresses G&T provision. According to the



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January 2008 G&T count there are no existing G&T sites (either LA or private) within the County. A small number of unauthorised sites counted in 2006 and 2007 suggests possible seasonal movement.

The policy wording “should an unmet need be identified for Denbighshire” is too open-ended. A clearer explanation and a firm commitment are needed. Additionally, what about applications for private sites given that the policy says “The County Council will provide...” Does this mean the CC will develop and equip it or simply identify land for a G&T site? .

**Telecommunications:** Any strategic aspects may need to be considered as part of infrastructure.

**Welsh language:** Chapter 5, paragraph 5.6 notes that six rural wards in the west and southwest of the county have over 60% Welsh speakers. It identifies that “the Welsh language and culture is an important part of Denbighshire’s identity and should be considered in forming LDP policies.”

**Historic Environment:** Policies in PPW are to be taken as read, and accordingly specific mentions of protection of the historic environment, the subject of legislation and planning policy, will be few. There is, however, an inconsistency in approach within the document leading to apparent anomalies or inappropriate emphasis.

Examples of this are: Appendices and Background Papers

Within what appear to be a series of constraint maps showing rationale behind the selection of sites for housing development, maps show SSSIs, AONBs and wildlife sites but do not show their historic environment equivalents – Scheduled Ancient Monuments (SAMs), Listed Buildings (LBs), Historic Landscapes, Parks and Gardens. Thus we read about Rhuddlan, Denbigh, Ruthin, Llangollen and Bodelwydden with no mention of their castles, surely the overriding asset and constraint of each town, and about St Asaph with no mention of the cathedral. The fact that Denbigh and Ruthin are both within a Registered Historic Landscape is not apparent either.

Cadw suggests that the maps show SAMs and the text has a separate Historic Environment item within the key issue table.

LDP Preferred Strategy

Chapter 5: Local Evidence Base: Key Land Use Issues

5.13: Landscape and Biodiversity

Consider interim/draft conclusions off the G&T assessment, identify sites explaining the selection criteria assuming at least one site will be required.

Identify the implications for and impacts of the LDP. Demonstrate how these are reflected in the strategy.

Incorporate appropriate refinement of the references to historic environment in the deposit plan.

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This does not mention the historic environment at all - it mentions statutorily protected SSSIs but not their historic equivalents SAMs, nor does it mention registered parks and gardens or registered historic landscapes.

## 5.14: Townscapes

The mention of Listed Buildings here is appropriate but not the mention of Scheduled Ancient Monuments. The large majority of the historic environment features within the county are rural. Cadw suggests either a new separate heading 'Historic Environment' to hold bullet points 5.14.1, 5.14.3, and 5.14.5, or renaming 5.14 'Historic Environment: Townscape and Historic landscape'. There should be a mention of the registered parks and gardens and historic landscapes within the county.

## 5.21.4

The special mention of the candidate World Heritage Site and the requirement to protect it and its setting is welcomed, but is perhaps inappropriately situated within section 5.21 Local Issues. No aspect of protection of the historic environment appears within the Chapter 5 Summary.

Cadw suggests expanding point 13 to read *'biodiversity, archaeological and built heritage and a high ....'* This would then tie in better with Policy 10: Key Areas of Protection (p82).

## Chapter 9

Cadw suggests that special mention be made within Policy 10 of the candidate World Heritage Site and its setting, the recommendation of the draft planning circular on world heritage sites in England. It does not really add to PPW but welcomes a specific policy for the protection of designated sites.

The target for monitoring Policy 10 are at p.98, but is limited to development on designated sites and SAMs. This is weaker than those for the SEA and ignores such issues as setting. It is a wide ranging objective but Cadw does not find that up to 5% development on SAMs as acceptable.

## Chapter 13 p 108

Rewrite the Candidate World Heritage Site paragraph to read:

*'will be assessed and the nomination decided within the LDP plan period. The site, its buffer zone and their setting will be a material consideration .....do not have an adverse impact upon the outstanding universal value of the World Heritage Site'.*

## Built Environment - (p 108-9)

This is more correctly termed the Historic Environment. It should also include within the list of assets Registered Parks and Gardens and Registered Historic Landscapes. Add 'and their setting' after 'on any of these'.

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*N.B. Further comments in relation to national policy are included under soundness tests CE1 & CE2*

**C3 It has regard to the Wales Spatial Plan****Comments**

The vision, strategy and spatial strategy and growth option are broadly inline with the WSP and overall there is a good fit. There is a good analysis of the main strategic documents and the implications from the WSP, the West Cheshire/North East Wales Sub Regional Spatial Strategy, and the Conwy/Denbighshire Spatial Framework appear to have been taken on board in the main although it could be made clearer how these have influenced the strategy.

Some key issues identified in the Spatial Plan for the NE Wales sub-region may need to be addressed further by the Strategy. Of particular note are the cross-boundary issues particularly connections to Wrexham, commuting patterns, and improving transport links between the coastal and border towns.

However an emerging model identified for the sustainable development of the Central Wales area, and to address the diverse range of places, identifies primary settlements, and hubs and clusters as focal points for appropriate plan led growth and investment. Denbigh, Ruthin, Corwen and Llangollen are identified as key settlements which form part of the Denbighshire cluster, with Llangollen also having been identified as having a role to play in relation to tourism. The hub and cluster approach encourages communities to work collaboratively, not competitively to support their own needs and those of the smaller settlements and hinterlands which gravitate towards them, balancing the needs and aspirations of communities with appropriate plan led growth and service provision. The model acknowledges that the future development of many of the communities within the cluster will be subject to significance influence from other settlements within Central Wales, or in the case of Denbighshire with other Spatial Plan areas as well as English regions. However, no recognition has been given to Llangollen as a 'low growth settlement' (unlike Denbigh, Ruthin and Corwen which are all classed in this way) within the overall Strategy. Llangollen has the same status as Denbigh, Ruthin and Corwen in the Wales Spatial Plan in terms of having been identified as a key settlement within the Denbigh cluster. It also has added importance in terms of its contribution to tourism, but no reference has been made. There is a catch all in the overall strategy to say that 'smaller scale development opportunities in all other parts of the County will also be considered provided they contribute towards the principles of sustainable development.....'

**Suggested Actions**

Ensure plan strategy is consistent with emerging WSP approaches.

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See also further comments under Soundness Tests CE1 and CE2.	
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C4 - Has regard to the relevant community strategy	
Comments	Suggested Actions

CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities & CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base	
Comments	Suggested Actions
<p><i>The Preferred Strategy documentation should make clear what the <b>key issues</b> are that the LDP will address, what the plan <b>vision</b> is, what the plan <b>objectives</b> are, what <b>strategic spatial options</b> were considered and what the <b>preferred spatial strategy</b> is (see LDP Manual section 6.5).</i></p> <p><b>General</b></p> <ul style="list-style-type: none"> <li>The vision is fairly weak; without a clear and strong vision identifying objectives that are needed to achieve the vision is difficult. It could be more locally distinct, albeit it does refer to the coast, market towns and rural areas, and it should provide a clear picture of where the County will be at the end of the Plan period, how it will look, function etc (see LDP Wales para 2.10). The vision is not used or referred to later?</li> <li>There is a good range of objectives that are clearly developed from the issues identified earlier in the Strategy. Some of these are quite vague though, (e.g. Minerals, Waste, Energy, Housing). They</li> </ul>	<p>Consider the need to:-</p> <ul style="list-style-type: none"> <li>Ensure appropriate evidence is available and its influence in developing and supporting the strategy is clear.</li> <li>Background documents/information are available asap to ensure they can input into the development of the LDP. The deposit plan must be supported and influenced by an</li> </ul>

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<p>will need to be developed further at the deposit draft stage. Objectives should be specific, quantifiable, realistic, and easily monitored, to ensure they can be achieved and deliver the vision.</p> <ul style="list-style-type: none"> <li>• There could still be a local objective against which to assess alternatives even if an issue is covered by national policy. The approach to this in the PS objectives is inconsistent.</li> <li>• Whilst in general the link between issues, visions and objectives is well made there are some exceptions. Some objectives seem to be based on anecdotal evidence, such as the Townscape objective and Open Space objective. Anecdotal evidence may not be a strong enough basis for an objective, and the LPA should ensure that the evidence base is both clear and complete as early as possible so it can fully inform the development of the Strategy.</li> <li>• The strategic policies covering the growth/spatial strategy could be improved-for example Policy 1 growth strategy only refers to housing, there is some inconsistency in the presentation in respect of whether the growth options relate to retail as well as housing and employment, there is no distribution of growth between types of area?</li> <li>• The rural development strategy could be expanded/refined.</li> <li>• PPW is covered in appendix 6 but not referred to or cross-referenced in the main text.</li> <li>• Policy 17: are the master plans intended to be SPG and what status do they have for planning purposes?</li> <li>• Is Policy 17 positive enough to provide the impetus for regeneration of the areas identified?</li> <li>• In places the phrasing and terms used in the preferred strategy could be improved.</li> <li>• It would be useful if the County Character Map showed the neighbouring towns outside the county so their influence on the county is made clear.</li> </ul> <p><b><u>Evidence- Robust and Credible</u></b></p> <ul style="list-style-type: none"> <li>• There may be a need for more evidence and associated policy reference to retail floor-space, existing strategic open space shortfalls, PDL availability and minerals and waste.</li> <li>• Para 5.1.7 refers to the 'highly significant number of young people in the 18-30 age ranges currently moving out of the county every year'. A figure is not stipulated. This raises the question of where the evidence has come from, and if the figures have been completed why have they not been included? The Strategy needs to clearly show how it addresses this issue to ensure this trend does not continue.</li> <li>• Clarity of the Preferred Strategy could have been improved by more explicit use of, or cross-</li> </ul>	<p>appropriate sound evidence base.</p> <ul style="list-style-type: none"> <li>• If any fundamental aspects of the Strategy change when evidence is finalised, the documentation must make clear where such changes occur.</li> <li>• Amend/enhance the LDP vision to make it more locally distinct and ensure the LDP objectives are clearly related to the vision.</li> <li>• Use the contextual work and LDP objectives to make preferred choices.</li> <li>• Relate the objectives to a monitoring framework.</li> <li>• Ensure policies provide clear requirements as to how the spatial strategy will be delivered; and that they are well related to the preferred spatial strategy.</li> <li>• To consider and clarify these internal linkages.</li> </ul> <p>The deposit LDP will need to develop further the type, scale and location of the major and more local development required to achieve the strategy.</p>
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reference too, the background papers or evidence in the strategy document.

- Background studies and other supporting documents that are intended to provide the evidence base to the preferred strategy and will inform the subsequent deposit plan could be listed.

**Coherence (links) and flow**

- Neither the identified objectives nor a distillation of the background/regional documents are used explicitly to assess the options.
- The Policy Context section usefully identifies the key plans, policies and programmes that will influence the development of the LDP. The summary at para 4.2 provides a reader-friendly snapshot of the main issues that emerge from policy. At the deposit stage consideration should be given to whether the main policy context section would be better placed in an Appendix, with just the summary “up front”. This may improve the readability of the document, improving its flow from introduction- issues- vision and objectives.
- The coherence of the strategy could be improved, particularly regarding the way in which the evidence base has been used to develop policy. For example, one of the objectives under 'Population and Community' aims "to meet projected housing needs", but the information from the evidence base (Local Housing Market Assessment) would suggest a need for affordable housing which the LDP does not propose to meet.

**Connections**

- Connections between preferred approaches are not always explored. In order to make up a coherent 'strategy' there needs to be greater links between the policy topics. There is perhaps an over-emphasis on topics.  
Some examples include:-
  - The housing/employment growth text could be better integrated
  - Likely affordable yield relative to needs. See CE2
  - Links between mixed use areas and need to travel
  - Link between language sensitive areas and the preferred strategy of concentration of development on coast
  - Link between WSP (Conwy/Denbighshire Study) strategy and the coastal growth option could be made more explicit.
  - The policies could be set out by area rather than topic so that for instance the rural strategy covers say 8 iii, maybe 12 (language sensitive areas) and something about

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village development strategy from 7.3.6 as well as rates of growth/boundaries/hierarchies/clusters.

- The opportunity is missed to build on the settlement assessment to present spatially specific and linked policy for delivering change and protection. The obligations policy 3 could be spatially related to refer to the special requirements on key sites and the more normal requirements on smaller sites? It could also refer to public transport as well as highways? Affordable housing targets 4 etc may have a rural urban distinction? Land for employment policy 8 might be better linked into the growth strategy policy.
- There is a useful generic approach to the policy on areas of protection (10) although other topics might be included such as minerals safeguarding and buffers, transport routes etc. A more generic approach could also be taken to policy to secure mitigation of various types or deliver key areas of change.
- Community safety could be integrated with sustainable design as could policy 3 infrastructure and policy 11 opens space.
- The linkage table at p 85 could be expanded --and given greater prominence in the presentation.

**Cross Boundary Issues and Neighbours**

- Reference is made to the links between Rhyl and Towyn/Kinmel Bay but it is not clear if this has been explored in depth or fully agreed with neighbours, links further afield may also need more consideration.

**Realistic and Appropriate**

- Limited objective assessment of the options and hence justification for the preferred option is presented.
- Rhualt does not seem particularly sustainable and as such stands out in the list of low growth settlements?
- It is noted that the preferred strategy proposed Prestatyn as a “low growth settlement”. The Strategy should ensure that this level of growth is appropriate to help deliver the regeneration programme required in the town.
- Page 61 – Table showing housing requirement –Is there evidence to show that the 20% contingency for sites not coming forward is appropriate, and whether it is appropriate to include a figure for this in the Strategy.
- The LPA will need to show that there is a sound evidence base for the 500 homes per annum. The

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figures shown give only an average annual figure and do not indicate when the peaks and troughs in delivery will be – a form of housing trajectory could be provided.

- Congestion and road infrastructure are identified as issues in certain parts of the county. It is recognised that although there has not always been a coherent approach in the past, infrastructure is now to be a 'key consideration' (p.39). But how this is to be realised is unclear and therefore the commitment to improve the approach feels somewhat aspirational.

**Sufficient Detail/Implications**

- It is not clear what the anticipated housing requirement is for the large number of rural villages nor that required to meet the needs of the market towns.
- The document is vague on the number and combination of key sites that will be required to deliver strategy. Although this provides flexibility for this stage of the Plan's development, it also introduces uncertainty as to the size, location timing of the growth proposed. The evidence to be used in deciding the appropriate mix of these sites is unclear.
- The minimum size of key sites needed to fund relevant infrastructure is not identified or made clear e.g. does the cost of the bridge at Rhyl mean that this site can only be developed in its entirety?
- The lack of an expressed preference for key sites based on plan objectives means it is difficult to create policies to deliver the strategy. Policies will need to be refined and made less open for the deposit plan.
- Some of the strategic policies are more like objectives and do not address how and where strategy will be delivered, and how requirements will vary depending on place and location.
- Phasing - its not clear if and where commitments/PDL are expected to be developed first or when key sites are to be released.
- The implications of policy 18 flagship tourism scheme are not clear.
- The relative travel implications of locating key growth sites on the coast near the main centre and rail/bus corridor as opposed to sites on the main A55 road corridor are not highlighted.

**Candidate sites**

- A number of the candidate sites are located on land, which has potential to be BMV. Primary assessments of these sites are being carried out and it is assumed that all of the sites will be assessed in accordance with the site methodology process as noted within Chapter 13.



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<ul style="list-style-type: none"> <li>• The Candidate Site assessment methodology includes reference to flood risk. It is important, given the policy requirements in PPW and TAN 15, the council's own evidence base via SFCA and the approach taken towards key growth areas, that avoiding flood risk areas is followed through into the deposit plan.</li> <li>• Agricultural land classification is included within the site assessment methodology however (this may only be a typographical error) it appears that only land of Grade 1 will be protected. The assessment should seek to protect all land within the BMV category (Grades 1,2 &amp; 3a) as reflected within the Policy.</li> <li>• The Candidate Site assessment methodology does not explicitly recognise climate mitigation and adaptation issues in selecting sites, particularly opportunities around energy supply.</li> <li>• The methodology does not mention historic parks and gardens.</li> </ul>	
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<b>CE 3 There are clear mechanisms for implementation and monitoring</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<p><b><u>Implementation and Delivery</u></b></p> <ul style="list-style-type: none"> <li>• The deliverability of the preferred option/s has not really been addressed in the preferred Strategy document. Consideration should be given in developing the deposit plan to broad phasing for developing housing and employment land etc over the plan period, to timescales for implementation, and to any related SPG.</li> <li>• There is also a lack of detail with regards to implementation of the Strategy. Indication of how the policies and proposals will be implemented, the key delivery bodies/agents required, and the timescales for delivery should all be considered at an early stage and detailed in the deposit plan.</li> <li>• The LDP should provide a more pro-active approach; setting out what development is needed and will take place to ensure delivery of the aims and objectives.</li> <li>• The housing data provided in the appendices only provides historical data of housing completions. A form of housing trajectory showing how this figure will be achieved over the 15 years in order to provide a firm basis for delivery, and also ensure that a five-year supply of housing is genuinely available could assist.</li> <li>• If infrastructure is required the measures needed and how and when they could be secured should be identified. For example, what is the current state of capacity, what are the issues, what are the</li> </ul>	<p>Ensure that there are clear mechanisms for implementation.</p> <p>Particularly important will be ensuring that the key elements can be delivered, and providing the timescales that are proposed for this delivery.</p> <p>Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p>

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<p>implications of public investment programmes, how will any necessary improvements be co-ordinated and what is the impact on delivery and is there a need for phasing?</p> <ul style="list-style-type: none"> <li>• Where it is an issue it will be beneficial to match up the evidence obtained on flooding consequences with an understanding of infrastructure / mitigation measures required to ensure delivery, as well as the means by which these could be secured and whether opportunities for enhancing resilience could be secured. For example, what investment would be required and where? How may this relate to flood risk management priorities, are there synergies to be gained? This could be assisted through appropriate collaboration with drainage /flooding and coast protection colleagues within the CC and with external organisations such as EAW.</li> </ul> <p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>• The monitoring section provides indicators and targets against the policies. However, it is not clear what information the LPA is expecting to gain from their monitoring report each year; for example 'completion of the project by 2012' as a target for Policy 9 on retail and the Queens Arcade redevelopment scheme, or 'in line with 2020 targets' in relation to renewable energy. Such targets do not make it explicitly clear how incremental progress can be measured, but focuses on the end result.</li> <li>• There is a need for clearer targets and indicators that are measurable and allow progress to be monitored.</li> <li>• Monitoring is covered by topics/policy. It could also be related to objectives.</li> <li>• The linkage table could be used to present the basis of the monitoring.</li> </ul>	<p>Include relationship of monitoring to objectives and consider clearer targets or milestones and indicators that are measurable and allow progress to be monitored.</p>
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<p><b>CE 4 It is reasonably flexible to enable it to deal with changing circumstances</b></p>	
<p><b>Comments</b></p>	<p><b>Suggested Actions</b></p>

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- The deposit LDP should be sufficiently **flexible** to enable it to deal with changing circumstances (such as a site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.
- Monitoring evidence should help inform or initiate future amendments or reviews.
- Although contingency is built into the rounded/about housing figure the formulation of the strategic policies does not allow for future flexibility in terms of the rate of release which may need to vary in future in the light of significant changes in say national population projections.

See reference to shore line, catchment and surface water flood risk studies at C1.

**END**

Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, site take up and other changes.