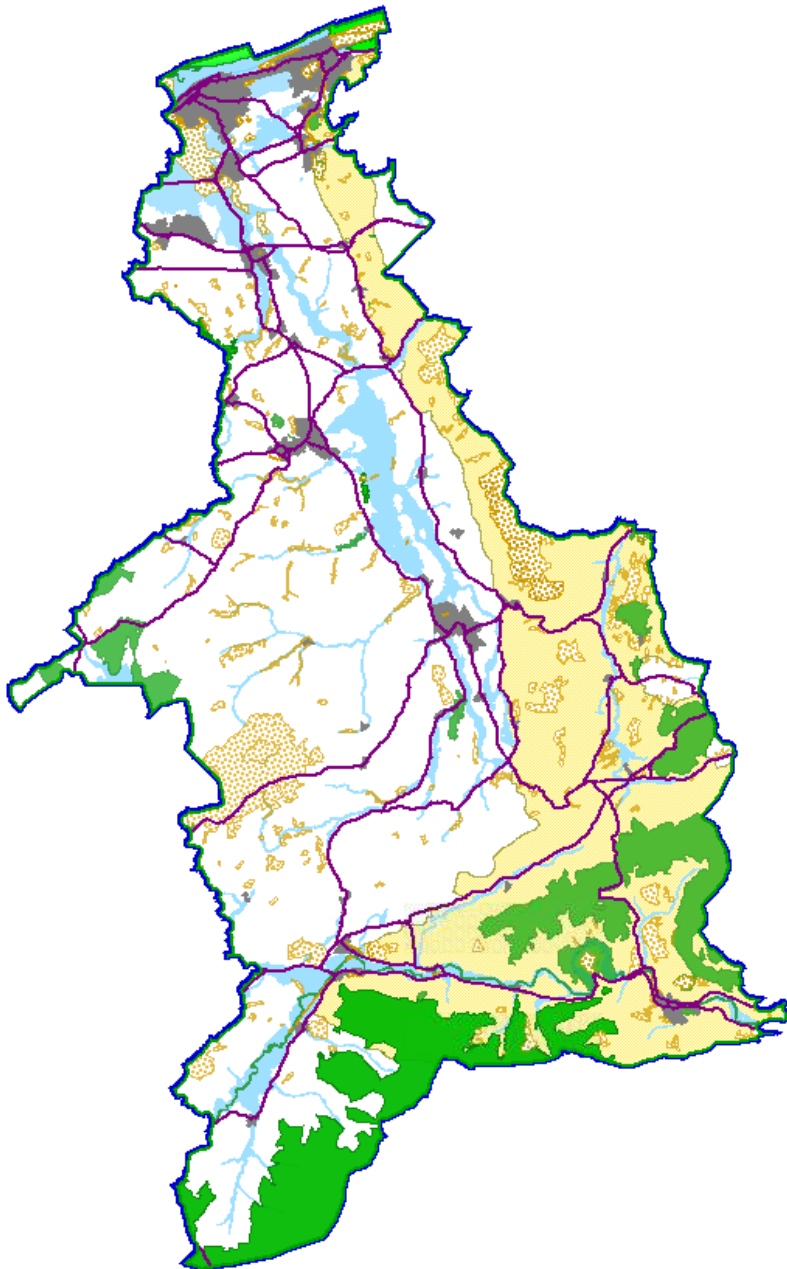


# Denbighshire Local Development Plan 2018 - 2033

## Initial Sustainability Appraisal Report

2019



## **Non-Technical Summary**

1. This non-technical summary of the Sustainability Appraisal (SA) provides an overview of the findings which are set out below in more detail.
2. This Initial Sustainability Appraisal (SA) Report accompanies the Draft Preferred Strategy for Denbighshire's Local Development Plan 2018 to 2033 (Replacement LDP).
3. The Planning and Compulsory Purchase Act 2004, Planning Policy Wales and the Welsh Government require an SA to be carried out for all development plans in Wales. This SA process reflects that statutory requirement, as well as the requirement to undertake a Strategic Environmental Assessment (SEA), required by the European Directive EC/2001/24. The use of 'SA' in this non-technical summary incorporates SEA.
4. The SA considers the impacts that the Replacement LDP may have socially, economically and environmentally in Denbighshire. Any identified issue that arises from a policy in the Replacement LDP, can be addressed by amending the policy or mitigating its impact. The SA aims to ensure that the Replacement LDP promotes development; which in itself is sustainable, as well as being situated in a sustainable location.
5. The SA has assessed the potential outcome of there being no Replacement LDP. Without a Replacement LDP, development in Denbighshire would be guided by national policy and overall this is likely to result in negative impacts for Denbighshire. Development in Denbighshire without a plan would overall be potentially sustainable but at a local level the pattern would be unsustainable and would not meet the needs of Denbighshire. It is therefore critical that a Replacement LDP is adopted for Denbighshire, so that there is a plan in place when the adopted LDP (2006 - 2021) expires.

6. The SA assessed five potential growth options, four potential spatial options, as well as the preferred growth and spatial options. The preferred options for the Replacement LDP are those that were considered to produce the most positive and least negative effects. Mitigation of likely significant effects has also been considered.

### Key Findings

7. Set out below are the key findings of the baseline assessment together with the SA assessment of the Draft Preferred Strategy of the Replacement LDP.

#### **Baseline**

8. The population of Denbighshire is significantly older than that for Wales with a median age of 46.2 in 2017 compared to 42.5 for Wales as a whole. There is a net outwards migration of workers, particularly 16 to 29 year olds. Home ownership has become increasingly unaffordable within Denbighshire and there is a significant need for smaller properties and more affordable housing. The location of development has to be sensitive to: - the Welsh language; pockets of deprivation; Area of Outstanding Natural Beauty (AONB); conservation sites; as well as the natural, agricultural, historic and cultural landscapes and environments. Human health and wellbeing, as well as climate change, together with its potential impacts, has to be part of the consideration of sustainable development.

#### **Overall level of growth**

9. The Draft Preferred Strategy was assessed as being the most sustainable in terms of combining employment land and housing provision, including affordable housing need. The SA found that 3,775 dwellings, 750 affordable homes together with 68.6 hectares of employment land for the lifetime of the Replacement LDP, was appropriate.

10. The SA showed that bringing forward employment land via a mixed use site, was more likely to deliver economic benefits, than employment allocations alone.

#### **Spatial distribution of growth**

11. The SA found that distributing growth to serviced settlements together with at least one larger, strategic mixed use site was most sustainable.
12. In order to achieve flexibility of growth, in terms of infill and small sites outside of serviced settlements, there will have to be a case by case determination, which includes consideration of cumulative effects that are specific to the proposed site and surrounding area.

#### **Mitigation**

13. Overall the Replacement LDP Vision, Objectives, Key Policies and Draft Preferred Strategy are considered sustainable. There were no findings that they hindered or significantly conflicted with the SA objectives. Impacts on finite resources and the natural, historic, cultural, as well as the built environment and landscape will depend on how the key policies and strategic options are implemented. Further definition of the key strategic policies together with identification of key development sites at the Deposit stage will influence and provide clarity as to the sustainability of the Replacement LDP.
14. Mitigation measures have been recommended where there are potentially significant impacts which include air pollution and water capacity.

#### **Monitoring**

15. In order to assess whether the Replacement LDP is moving towards encouraging sustainable development, this Initial SA Report will be updated and revised at the LDP Deposit stage. Consideration has however, already been given to how polices will be monitored on an annual basis. An indication of the way in which the SA Framework may be monitored, including what sources of information could be used, can be found in Section IV; Table 21 the Monitoring Framework and

Section IV.III Monitoring. Currently the Monitoring Framework is draft and will be refined further at the Deposit stage.

### How to Comment on the Report

16. The Replacement LDP Draft Preferred Strategy and Initial Sustainability Report will be published for consultation from 8 July 2019 until 30 August 2019. Should you wish to submit comments on the Initial Sustainability Report, please provide your comments in one of the following ways:

By utilising the consultation portal at <https://countyconversation.denbighshire.gov.uk/kms/dmart.aspx?strTab=PublicDMart>

Or by using the Local Development Plan 2018 – 2033 Draft Preferred Strategy Consultation Response Form available at

<https://www.denbighshire.gov.uk/en/resident/planning-and-building-regulations/local-development-plan/local-development-plan.aspx>

Return it by:-

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

By post to: Local Development Plan 2018-2033,  
Initial Sustainability Report  
Strategic Planning and Housing,  
Planning and Public Protection Services  
Denbighshire County Council  
PO Box 62,  
Ruthin,  
LL15 9AZ.

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## I. Introduction

- 1.1 Denbighshire County Council is preparing a Local Development Plan for 2018 -2033, which will replace the adopted Local Development Plan 2006- 2021. The Replacement LDP will be a statutory document and it is a legal requirement to undertake a Strategic Environmental Assessment (SEA) under The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, which gives effect to European Directive 2001/42/EC. A Sustainability Appraisal (SA) is required by The Planning and Compulsory Purchase Act 2004.
- 1.2 The overarching objective of the SEA Directive is:  
*“To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.”*  
(Article 1)
- 1.3 Whilst SEA is principally concerned with environmental factors, the SA addresses economic and social factors, as well as environmental issues. Its purpose is to address the effects of these three, interlinked issues, from the outset of the Local Development Plan (LDP) process. This will ensure that decisions made on the policies and strategy accord with sustainable development.
- 1.4 The Welsh Government, through their Local Development Plan Manuals 2015 and 2006, has directed that the requirements of the SEA should be incorporated into the SA. The 2006 document was created with reference to the Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005 and A Practical Guide to the SEA Directive, ODPM, Scottish Executive, Welsh Assessment Government and Northern Ireland Department of the Environment, September 2005. Any reference made to the SA in this report will therefore also include the requirements of the SEA.

1.5 The Well-being of Future Generations (Wales) Act 2015 has been introduced and sets out seven Well-being Goals that it requires public bodies to work towards as set out in Figure 1 below.



*Figure 1 Well-being Goals.*

1.6 Conwy and Denbighshire, by way of their Public Service Board, have a Joint Well-being Plan (2018 - 2023), which based on the Well-being Goals (Figure 1 above), sets out three priority areas of:- people, supporting good mental well-being for all ages; community, supporting community empowerment and place, supporting environmental resilience. There are four principles that support these priorities, which are to tackle inequality, promote the Welsh language and support access to healthy, safe and appropriate accommodation, as well as avoiding duplicating work. These priorities and principles, with the exception of avoiding duplicating work, together with the Well-being Goals have been incorporated into the SA Objectives (Section III.IV below).

1.7 The Well-being of Future Generations (Wales) Act 2015 also defines sustainable development, which is repeated in the provision of the Planning (Wales) Act 2015. Sustainable development is defined as

*“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.*

- 1.8 The Brundtland Report in 1987, the World Commission on Environment and Development, first defined sustainable development as:
- “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”*
- 1.9 There is also a requirement, under the Conservation of Habitats and Species Regulations 2017, to assess the likelihood of any significant effects of the Replacement LDP on protected species and habitats. This assessment is carried out in parallel to the SA process and will be reported separately, as set out in Section XII.
- 1.10 This Initial SA Report discusses the SA / SEA Process (Section II), reviews the baseline trends, 2017 Scoping Report and SA Objectives (Section III.IV), in order to develop an SA Framework (Section IV) that can be used to assess the Replacement LDP. The established SA Framework is then utilised to assess a variety of strategic growth and spatial options (Sections VII and VIII), as well as the Draft Preferred Strategy (Section XI) together with the Vision (Section V), Objectives (Section VI) and Key Policies (Section IX) for the Replacement LDP. An SA assessment is also undertaken of the position if there was no LDP (Section X).

## II. SA / SEA Process and the Replacement LDP

2.1 The SA is an iterative process. It identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan, will achieve the social, environmental and economic objectives. These social, environmental and economic objectives define sustainable development. The intention is that the SA is fully integrated into the plan-making process from the earliest stages, both informing and being informed by it. The stages are set out in Table 1 below, together with a section identifying where they can be found in this report or when they will occur.

*Table 1: Stages in the SA process and their relationship to the Replacement LDP (RLDP). Adapted from the LDP Manual (2nd Edition)*

<b>RLDP Stage</b>	<b>SA / SEA Stages</b>		<b>Initial SA Report Section</b>
Evidence Gathering and Objectives	A: Setting the context and objectives, establishing the baseline and deciding on scope.		II, III, IV, Appendix A and B
	A1	Identifying other relevant policies, plans, programmes and sustainability objectives.	II, III, Appendix A
	A2	Collecting baseline information.	III
	A3	Identifying sustainability issues and problems.	III
	A4	Developing the Sustainability Appraisal Framework.	III, IV, Appendix B
	A5	Consulting on the scope of the Sustainability Appraisal.	II
Strategic options and Preferred Strategy	B: Developing and refining options and assessing effects.		V, VI, VII, VIII, IX, X, XI
	B1	Testing the RLDP objectives against the Sustainability Framework.	VI
	B2	Developing the RLDP options.	VII, VIII, IX
	B3	Predicting the effects of the RLDP options.	VII, VIII, IX, X
	B4	Evaluating the effects of the RLDP options.	VII, VIII, IX, X
	B5	Considering ways of mitigating adverse effects and maximising beneficial effects.	XI
	B6	Proposing measures to monitor the significant effects of implementing the RLDP.	V, XIII

	C: Preparing the Environmental Report		This report.
	C1	Preparing the Environmental Report.	
	D: Consultation on the Draft Replacement LDP and the Environmental Report		Dealt with in the updated SA report.
	D1	Consulting on the RLDP Preferred Strategy and the Initial SA Report.	
D2(i)	Appraise any significant changes from consultation.		
RLDP Preparation and Deposit		Update the SA report.	Dealt with in the updated SA report.
		Examination.	N/A
Submission, Examination and Adoption	D2(ii)	Appraising significant changes resulting from representations.	Dealt with in the Final SA Report
	D3	Making decisions and providing information.	
		Adoption statement and final SA report.	
Monitoring and Review	E: Monitoring the significant effects on implementing the Replacement LDP		N/A – Will be dealt with in the Annual Monitoring Report
	E1	Finalising aims and methods for monitoring.	
	E2	Responding to adverse effects.	

## Stage A: Setting the Context and Objectives, Establishing Baseline and Deciding on Scope

2.2 Denbighshire County Council had undertaken Stage A of the SA in December 2017 with the publication of the Sustainability Appraisal (incorporating Strategic Environmental Assessment) Reconsideration and Scoping Report. The Scoping Report contained a review of national, regional and local plans, policies and programmes (A1), updated baseline information (A2) and identified issues and problems (A3). The Scoping Report concluded that the sustainability framework and objectives (A4) should remain the same as developed for the adopted LDP 2006 to 2021. Consultation (A5) was sought on the 2017 Scoping Report with City, Town and Community Councils, Statutory Consultees and Governmental Departments; members of the public and Natural Resources Wales (NRW). Consultees commented that the SA should change to take account of the Well-Being of Future Generation goals.

NRW welcomed baseline information being updated together with policies; were satisfied with the SA objectives and recognised that the SA would evolve with the Local Development Plan.

- 2.3 It is acknowledged that the statutory, environmental, social and economic landscapes have changed since the time of the adopted LDP. Monitoring of the previous sustainability framework has become difficult with the limited availability of data. Furthermore, the previous objectives do not give sufficient consideration to the Well-being of Future Generations (Wales) Act 2015 or the Conwy and Denbighshire Public Services Board Well-being Plan (2018 – 2023), as pointed out during consultation and within the 2017 Scoping Report itself.
- 2.4 This Initial SA Report therefore reviews SEA / SA Stage A as set out in Sections III and IV below.

**A1: Other Relevant Plans and Programmes**

- 2.5 The Replacement LDP, SA Scoping Report and this Initial SA Report are set within the context of national, regional and local objectives and/or policies which include strategic planning, transport, social, economic and environmental policies which are set out in Appendix A. A review of relevant plans, policies and programmes has been undertaken to ensure that they do not conflict with the revised SA Objectives set out within this Initial SA Report. They will also be used to identify and resolve any potential conflicts with the SA Objectives.

**A2: Baseline Information**

- 2.6 To predict how potential plan policies will affect the environment, and social and economic factors, it is important to understand the current state of these factors. These factors are therefore assessed to consider trends, including what would be the likely position without a Replacement LDP, no adopted LDP at all. The SA Objectives have also been reconsidered in conjunction with the baseline data. This baseline informs what data is available for indicators, which will facilitate

monitoring of trends and the SA, (given that it is an iterative process). This ensures that the data collection carried out is both focused and effective. The identification of relevant indicators, has taken place alongside the assessment of other relevant plans, policies and programmes (Task A1), the identification of sustainability issues (Task A3) and developing the sustainability appraisal framework (Task A4).

2.7 The baseline data together with sustainability issues are set out in Section III and relevant information required for assessment is referred to as part of the assessment of growth and spatial options in Sections VII and VIII.

### **A3: Sustainability Issues and problems**

2.8 The key sustainability issues for Denbighshire, have been derived by analysing the baseline data and contextual information from other plans and assessing what the likely significant issues will be over the longer term, i.e. 11 years +. This information is set out in this Initial SA Report as well as in the 2017 Scoping Report. The key sustainability issues relevant to the Replacement LDP were identified in the following ways:

- Analysis of the objectives and issues, highlighted in other plans and programmes that are relevant to Denbighshire and its communities;
- Analysis of the baseline data and trends.

### **A4: Sustainability Appraisal Framework**

2.9 A set of objectives and indicators, against which the policies and proposals in the Replacement LDP can be assessed, was drawn up under the three sustainable development dimensions: social, economic and environmental.

2.10 The SA Objectives were derived from the 2017 Scoping Report together with various plans, policies and programmes that were reviewed as part



of Task A1, collection of baseline data (Task A2) and the identification of key sustainability issues (Task A3).

- 2.11 The revised SA Framework attempts to establish the use of indicators specific to Denbighshire and to identify local targets against which to assess the Replacement LDP.

**A5: Consulting on the Scope of the Sustainability Appraisal**

- 2.12 Consultation was sought on the 2017 Scoping Report as set out earlier. Consultation on this Initial SA Report with the updated baseline, revised SA Objectives and Framework will take place at the same time as the Draft Preferred Strategy for the Replacement LDP. There will be a formal eight week public consultation period for the Draft Preferred Strategy and this Initial SA Report.

Stage B: Developing and refining options and assessing effects

- 2.13 Stage B of the SA forms part of this Initial SA Report. It will comply with:-

**B1: Testing the RLDP Objectives against the Sustainability Framework**

**B2: Developing the RLDP Options** in terms of strategic growth and spatial options and considering how they are delivered through key policies. These options and policies will then be assessed to:-

**B3: Predict the effects of the RLDP Options and**

**B4: Evaluate the effects of the RLDP Options.**

**B5: Considering ways of mitigating adverse effects and maximising beneficial effects** are also discussed in this Initial SA Report, as are

**B6: Proposing measures to monitor the significant effects of implementing the Replacement LDP.**

- 2.14 The relevant sections of this report that cover the SA stages are identified in Table 1 above.

### **III. Baseline, Sustainability Issues and Revised SA Objectives**

- 3.1 The SA objectives and SA framework that were referred to in the 2017 Scoping Report, were developed in respect of the adopted LDP and were originally assessed in June 2007 and then re-appraised in October 2009. It emerged through the review process that those objectives and that framework did not adequately deal with the Well-being of Future Generation (Wales) Act 2015. It became apparent from monitoring the SA Framework, that some of the data required to assess significant effects, is now obsolete.
- 3.2 The baseline data has therefore been reviewed together with the SA objectives, framework and indicators. The baseline data is set out below under the headings of social (III.I), economic (III.II) and environmental (III.III) factors.
- 3.3 The recommended SA Objectives are then considered in light of the SEA indicators together with SA indicators and targets (III.IV).

#### III.I Social Baseline

##### **Population**

- 3.1.1 The size of the resident population in Denbighshire, at 30 June 2017, was estimated to be 95,150 people, according to the 2017 mid-year population estimates from the Office of National Statistics (ONS).
- 3.1.2 The age structure of the County is significantly older than that for Wales or the UK as a whole. Denbighshire's 23.8% of the population aged 65 and over, compares to 20.6% in Wales as a whole and only 18.2% across the UK. The median age of the population in 2017 was 46.2 years (Wales = 42.5; UK = 40.1). The median age has increased from 43.5 to 46.2 years over the last decade.

3.1.3 The composition of Denbighshire’s population in 2017 can be seen in Figure 2 below.

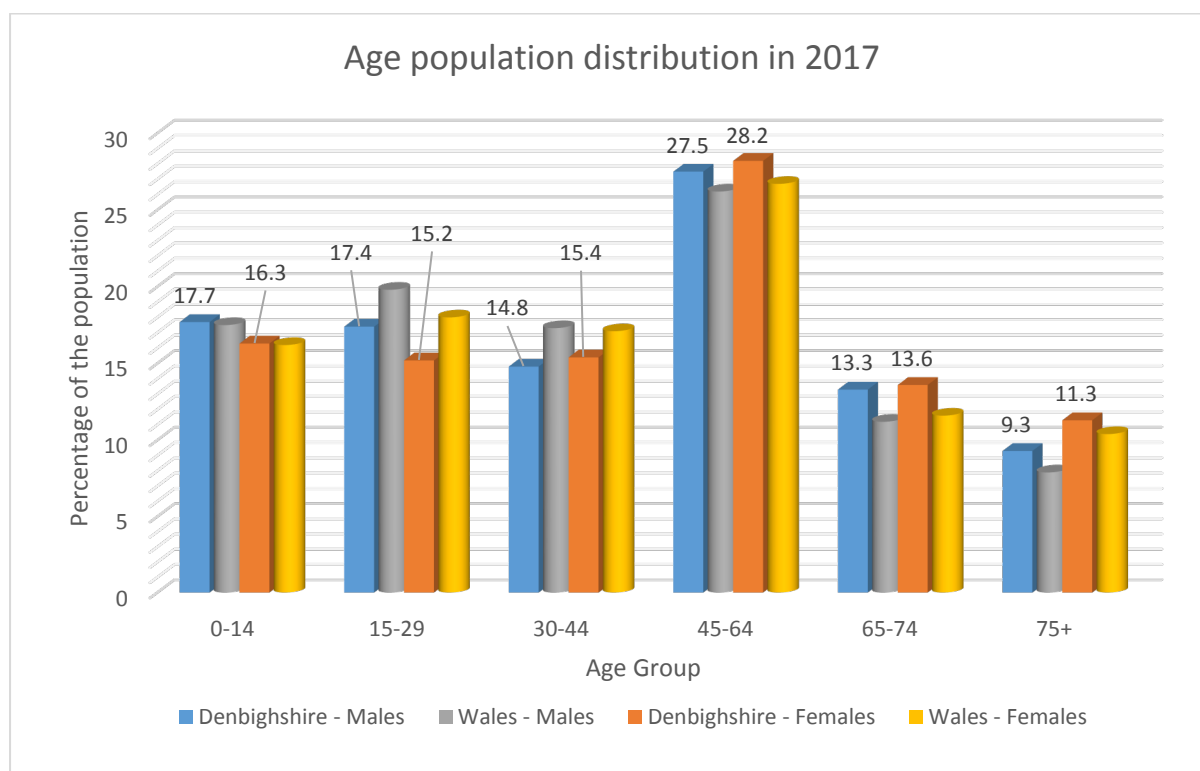


Figure 2: Population Composition by Age Category. Source: 2017 mid-year population estimates, ONS.

3.1.4 Denbighshire’s 58.1% of the population aged 16-64 compares to 61.5% in Wales as a whole and 62.9% across the UK. This is relatively low, and leads to a high dependency ratio, that is, the ratio of people of working age to those who are theoretically ‘dependent’ on that working age population. In 2017 the dependency ratio in Denbighshire was 722 dependents for every 1,000 of working age people. In Wales this was 625:1,000 (UK ratio is 590:1,000). A high dependency ratio can put strain on the local economy and on the resources needed to provide social care.

3.1.5 The population density of Denbighshire has not changed significantly. In 2017 it was 113.7 people per km<sup>2</sup> whilst in 2013 it was 113 people per km<sup>2</sup> and in 2011 it was 112.2 people per km<sup>2</sup>. It is also unlikely that the distribution of Denbighshire’s population has changed and the majority of the population continue to reside in the North of the County in Rhyl and Prestatyn.

3.1.6 Life expectancy at birth in males has slightly decreased from 2013-2015 to 2015-2017; from 78 to 77.8, whilst for females it has remained the same at 81.8. These rates are below the Welsh national figures of 78.4 for men and 82.2 for females (2015-2017). Unusually when considering life expectancy at age 65 it has improved for men from 17.7 in 2013-2015 to 17.9 in 2015-2017, whilst in women it has decreased from 19.9 (2013-2015) to 19.8 (2015-2017); again these are below Welsh national figures for 2015-2017 of 18.2 for men and 20.5 for women. This data is available from ONS. Mortality statistics from ONS have also been considered for males (m) and females (f) for 2013, 2015 and 2017 as can be seen in Table 2 below. These indicate that in 2017 there was an increase in mortality in the 70-74 and 90+ age categories. There is a decrease in mortality of other age brackets with the exception of the age bracket 15 - 29, where possibly a traumatic event has occurred.

Table 2: Mortality figures by age for 2013, 2015, 2017. Source: ONS, 2019.

Mortality Figures by Age	2013			2015			2017		
	Total	M %	F %	Total	M %	F %	Total	M %	F %
Under 1	5	0%	0%	5	0%	0%	0	0%	0%
1 - 14	0	0%	0%	0	0%	0%	0	0%	0%
15 – 29	0	0%	0%	10	0%	0%	15	0%	1%
30 – 44	20	1%	0%	20	1%	0%	15	1%	0%
45 – 54	45	3%	1%	45	2%	1%	35	1%	1%
55 – 64	95	5%	3%	115	4%	3%	90	5%	3%
65 – 69	95	5%	3%	90	5%	3%	100	5%	3%
70 – 74	105	5%	4%	105	4%	5%	120	5%	5%
75 – 79	152	7%	5%	151	7%	6%	154	7%	5%
80 – 84	205	9%	8%	200	9%	8%	200	9%	8%
85 – 89	220	8%	11%	200	8%	9%	223	9%	9%
90 +	250	7%	14%	245	6%	15%	270	7%	15%
Total	1197	50%	50%	1146	48%	52%	1220	50%	50%

**Trend:**

- Denbighshire has an aging population primarily located in the North of the County with a high dependency ratio.

**Predicted Trend without an LDP:**

- Denbighshire's population will continue to age.
- The dependency ratio will continue to increase.

**Deprivation and crime**

3.1.7 Gross Disposal Household Income (GDHI) is a measure of the amount of money that individuals, living in a household, have available to spend after paying rent, loans, mortgages, taxes, benefits and social contributions such as private insurances or pensions. It does not take account of the cost of utilities or living costs such as groceries. The effect of inflation has not been removed. According to ONS, GDHI has increased in Denbighshire since 2001 where per head it was £11,540, whilst in 2011 it increased to £15,156 and in 2016 it was £16,409. The percentage growth on previous years has slowed. The growth in GDHI per person in 2001 was 3.8% compared to 2000, whilst in 2011 it was 3.5% compared to 2010 and in 2016 it slowed to 0.2% compared to 2015. The average annual growth over the 10 year period, between 2001 and 2011, was 3% per head, whilst in the 5 year period, between 2011 and 2016, this slowed to an annual growth of 2% per head.

3.1.8 The Welsh Index of Multiple Deprivation (WIMD, 2014) measures relative deprivation across a range of themes such as income, health, access to services, community safety, employment, etc. This information is based on the Lower Super Output Areas (LSOAs) that cover the whole of Wales. There are a total of 1,909 LSOAs. An LSOA has a minimum population of 1,000 and a maximum of 3,000 or the number of households is a minimum of 400 and a maximum of 1,200.

An area is classified as deprived if it has a concentration of people experience any of those forms of deprivation.

3.1.9 Table 3 shows the number of LSOAs in Denbighshire which are in the top 10%, most deprived LSOAs in Wales, by deprivation domain.

*Table 3.: Deprivation in Denbighshire by domain. Source: Conwy and Denbighshire Public Service Board*

<b>Deprivation Domain</b>	<b>Number</b>	<b>As % of all LSOAs</b>
Income	8	13.8%
Employment	7	12.1%
Health	6	10.3%
Education	5	8.6%
Access to services	8	13.8%
Community Safety	8	13.8%
Physical environment	1	1.7%
Housing	8	13.8%
Overall Index	8	13.8%

3.1.10 Deprivation in West and South West Rhyl is among the highest in Wales across multiple domains. There are high levels of unemployment, a significant number of people on low incomes and poor educational outcomes, amongst other things. Other parts of Rhyl, notably the South and East are less deprived and more prosperous. In addition to the historic decline of the tourism industry, Rhyl has suffered from a declining, town centre retail offering in recent years. Recent investments have focused on physical regeneration, particularly along the Promenade and also the development of Rhyl High School.

3.1.11 The incidence of cancer per 100,000 people between 2006 and 2015 is the highest in Rhyl East 3 at 1,052 with a significant number (31 out of 58) of the LSOAs in Denbighshire being higher than the Wales average (Welsh Cancer Intelligence and Surveillance Unit's National Cancer Register).

3.1.12 Repeat absenteeism is monitored by the Pupil Level Annual School Census (PLASC) and the National Pupil Database (from the Department of Education). Rhyl West had the highest reported number of school children who missed 15% or more of half day school sessions between

2013 and 2016 with all the Rhyl West Lower Super Output areas recording between 15% and 17% of pupils missing school which at secondary school level increased to between 24% and 25%. Denbigh Upper / Henllan, in line with the 2014 indices for multiple deprivation, came in 6<sup>th</sup> worst for absenteeism at 12% overall and 19% in secondary schools. This is in stark contrast with Denbigh Lower that had 0% absenteeism overall and 1% in secondary schools. It is in line with the percentage of pupils attaining at least 5 A\* to C grade GCSEs including maths and English / Welsh where Rhyl West 3 performs worst at 22% followed by Rhyl South West and other Rhyl West wards and then Denbigh Upper / Henllan. This is in stark contrast to Llanbedr Dyffryn Clwyd which is at the top of the performance table with 88% of pupils achieving at least 5 A\* to C grade GCSEs.

3.1.13 The North Wales police force covers an area of 2,375 square miles which in the last 10 years has seen a 3% increase in the population and a decrease of 6% in the local workforce since 2010. Victim based crimes have increased locally and nationally in the last 5 years with an increase in North Wales of 0.06 per person.

3.1.14 The annual crime rate in Denbighshire for 2018 is 89.12 recorded crimes per 1,000 people which is the second highest for the North Wales area after Wrexham at 103.00. The force average rate is 76.88 as can be seen in the charts (Figures 3 and 4) below. (Data available at [www.police.uk/north-wales/CRW07/performance/compare-your-area/](http://www.police.uk/north-wales/CRW07/performance/compare-your-area/).)

## Crime in Denbighshire compared with crime in the North Wales force area

Crime type:

In the year ending June 2018, the crime rate in Denbighshire was higher than average for the North Wales force area.

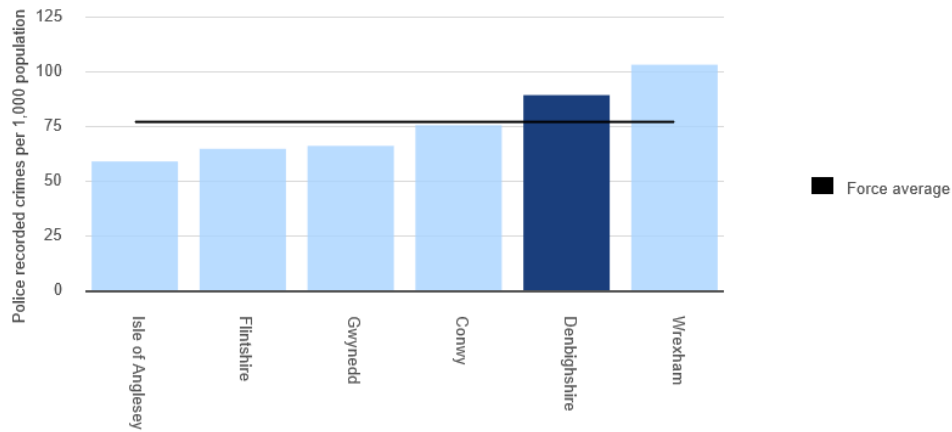


Figure 3: Crime in Denbighshire and North Wales. Source: North Wales Police, 2019.

3.1.15 Crime rates in Denbighshire have increased between June 2015 and June 2018 as can be seen in Figure 4 below.

## Crime changes over time in Denbighshire and in the North Wales force area

Crime type:

In the quarter ending June 2018, crime rates were:

- up in Denbighshire
- up in the North Wales force area

compared with the corresponding quarter in 2017.

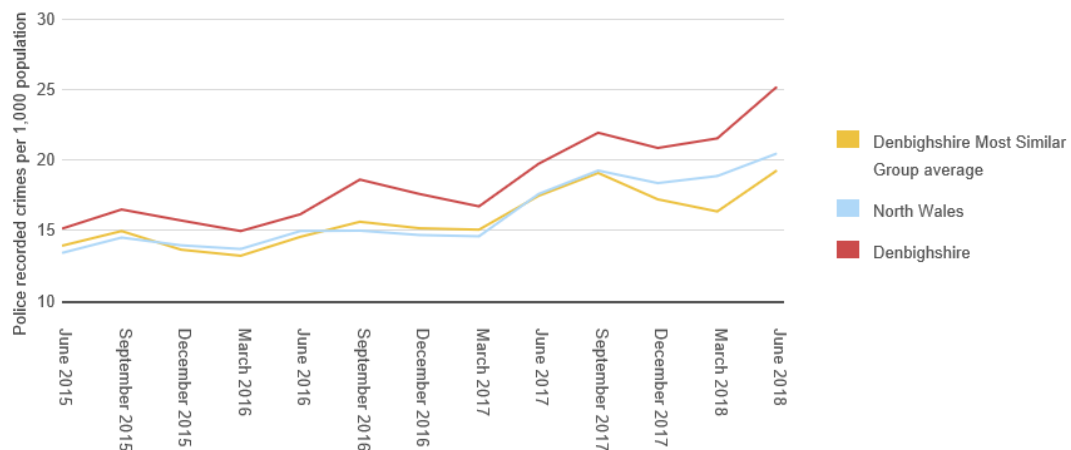


Figure 4: Crime in Denbighshire from 2015 to 2018. Source: North Wales Police, 2019.



3.1.16 Having considered North Wales police’s local neighbourhood map which shows crimes in localities, an approximate area for Denbighshire was drawn to create the charts listed below (Figures 5 and 6). The charts do include a count of some periphery towns outside of the Denbighshire boundary such as Kinmel Bay and may not include all the villages in Denbighshire. The five towns with the highest number of recorded crimes in December 2018 were utilised to show a trend since July 2016.

3.1.17 The majority of the monthly reported crimes between July 2016 and December 2018 were located in and around Rhyl and involved violence, sexual offences or antisocial behaviour as can be seen in the charts below (Figures 5 and 6).

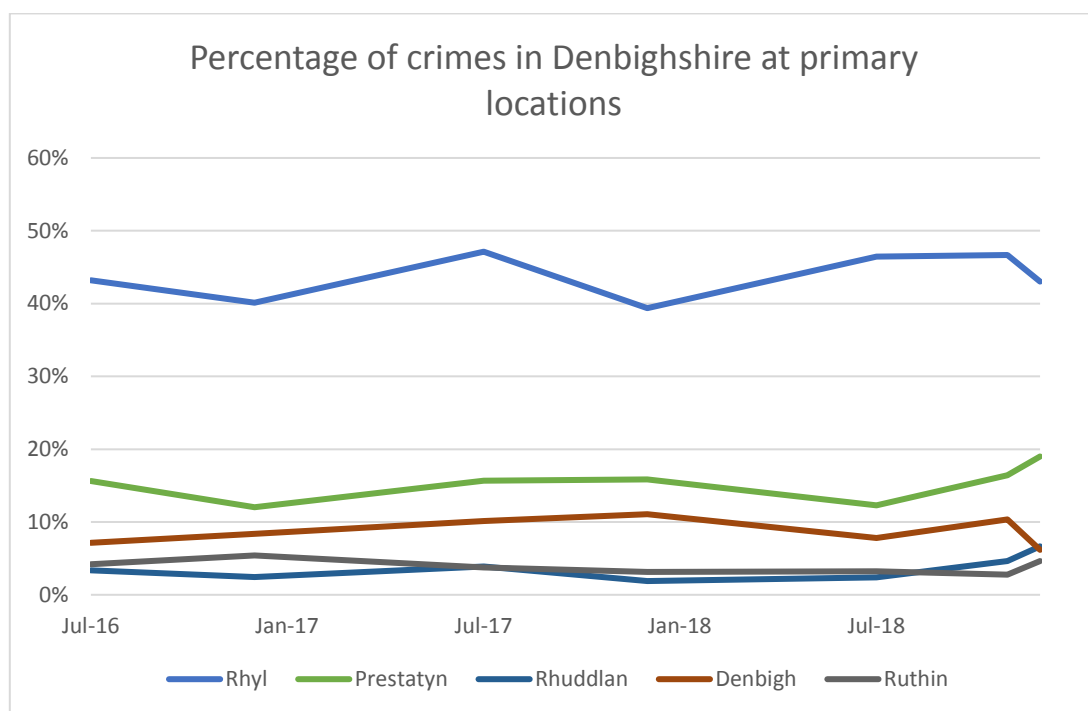


Figure 5: Percentage of crimes in Denbighshire. Source: North Wales Police, 2019.

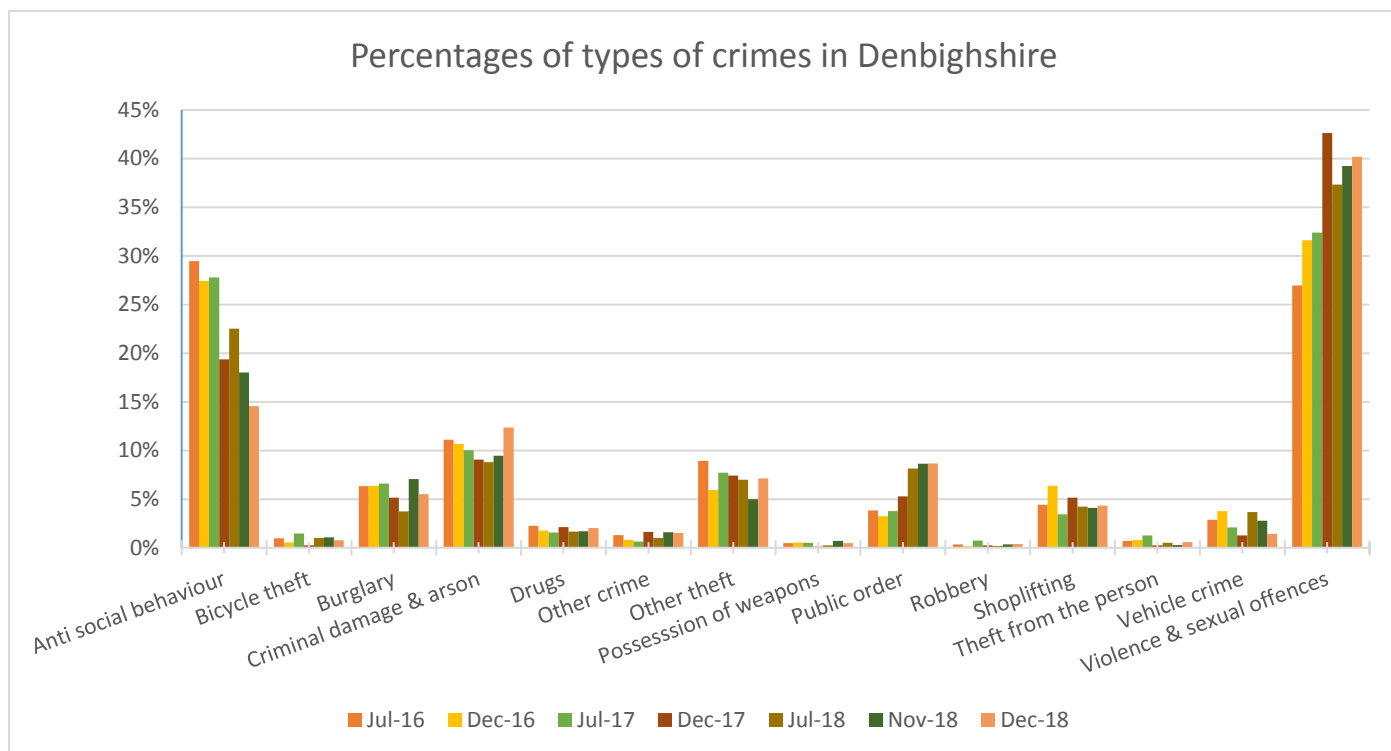


Figure 6: Types of crimes in Denbighshire. Source: North Wales Police, 2019.

**Trends:**

- Denbighshire has areas with high deprivation levels in terms of poor health, inadequate housing and low incomes.
- Parts of Rhyl are the most deprived areas in Denbighshire.
- The more deprived the area the higher the crime rate.

**Predicted Trend without an LDP:**

- Denbighshire will continue to have pockets of deprivation and there will be minimal progress in the most deprived areas.

**Housing**

3.1.18 In Denbighshire the average house price in the month of December 2016 was £142,220 and £144,829 in December 2017, an increase of 1.8% in 12 months. Wales as a whole has higher figures; the average house price for a property in Wales in December 2017 was £154,398, an increase of 5.4% in 12 months from £146,442 in December 2016. The average sales volume for Wales decreased by 3.8% from 3,957 in October 2016 to 3,805 in October 2017 whilst Denbighshire bucked this trend with an increase of 44.8% from 96 sales in October 2016 to

139 in October 2017. This data is derived from the Land Registry (2019).

3.1.19 Table 4 below which shows median (middle figure) and mean (average) prices in differing local housing market areas (LHMAs) according to the Land Registry (2016).

*Table 4: Mean and median house prices by Housing Market Area. Source: Land Registry data 2016 and Denbighshire's LHMA, 2019.*

House Sale Price by Housing Market Area	Mean Price	Median Price	Annual Sales 2016
LHMA01: Rhyl & Coast	£126,676	£118,000	467
LHMA02: Prestatyn & Meliden	£153,166	£128,000	384
LHMA03: Bodelwyddan & Border	£198,176	£173,000	141
LHMA04: Denbigh & West	£174,592	£148,000	153
LHMA05: Ruthin & East	£227,530	£198,500	169
LHMA06: Corwen & Llangollen	£195,365	£157,000	107

3.1.20 The median annual household income is £26,126 and the lower quartile annual household income was £16,447 in 2018 according to the CACI Paycheck data.

3.1.21 Flats and terraced houses are typically priced within the range of first time buyers although their availability is limited and home ownership has become increasingly unaffordable within Denbighshire. Table 5 below shows the range of properties sold by type and LHMA in 2016.

*Table 5: Property type by Housing Market Area. Source: Denbighshire's LHMA, 2019.*

House Type Sales in 2016 by Housing Market Area	All	Detached	Semi-detached	Flats	Terraced
LHMA01: Rhyl & Coast	467	220	149	26	67
LHMA02: Prestatyn & Meliden	384	185	135	15	39
LHMA03: Bodelwyddan & Border	141	76	37	0	21
LHMA04: Denbigh & West	153	70	41	1	31
LHMA05: Ruthin & East	169	82	34	3	33
LHMA06: Corwen & Llangollen	107	39	21	6	32
<b>Denbighshire Totals</b>	<b>1,421</b>	<b>672</b>	<b>417</b>	<b>51</b>	<b>223</b>

3.1.22 Table 6 compares the median and lower quartile house prices (MHP and LQHP) in 2016 with the median and lower quartile household income (MHI and LQHI) figures for 2017 per LHMA. It looks at the salary multiplier needed to attain the house price.

3.1.23 According to the online mortgage advisor, published on 20.7.2018, mortgages are now calculated based on affordability and as a general indicator a mortgage becomes unaffordable when it is more than 5 times a person's income.

3.1.24 Traditionally, mortgages were offered for no more than 3.5 times a person's income, which is what has been utilised in the Local Housing Market Assessment.

*Table 6: Affordability of houses in Denbighshire. Source: Denbighshire's LHMA, 2019 (adapted).*

<b>Median and Lower Quartile Income 2017</b>	<b>LQHI £</b>	<b>LQHP £</b>	<b>LQ Multiplier</b>	<b>MHI £</b>	<b>MHP £</b>	<b>Median Multiplier</b>
<b>Whole of Denbighshire</b>	16,447	108,000	<b>6.6</b>	26,126	153,750	<b>5.9</b>
<b>Rhyl &amp; Coast</b>	12,974	107,000	<b>8.2</b>	22,158	118,000	<b>5.3</b>
<b>Prestatyn &amp; Meliden</b>	14,935	110,000	<b>7.4</b>	25,890	128,000	<b>4.9</b>
<b>Bodelwyddan &amp; Border</b>	18,106	110,000	<b>6.1</b>	31,697	173,000	<b>5.5</b>
<b>Denbigh &amp; West</b>	17,245	111,500	<b>6.5</b>	29,307	148,000	<b>5.0</b>
<b>Ruthin &amp; East</b>	20,500	112,998	<b>5.5</b>	35,101	198,500	<b>5.7</b>
<b>Corwen &amp; Llangollen</b>	15,570	111,750	<b>7.2</b>	26,982	157,000	<b>5.8</b>

3.1.25 There was a significant reduction in house building activity following the global economic downturn of 2007 / 2008, which is only just starting to show a recovery. The 10 year average is about 170 net new dwellings each year and the 15 year average is about 220 each year.

3.1.26 Household growth rates are higher than population growth rates. This is due to the fact that it is not only population rates, but also household sizes that contribute to the increase in demand for houses. There has been a rapidly developing, long term trend, of smaller sized

households of one or two people. Average household sizes are expected to decrease in line with past trends.

3.1.27 2011 Census data also supports the notion that new provision should be concentrated on dwellings for smaller households. Denbighshire is already significantly over provided with larger properties that are under occupied. A very simplified measure of under occupation can be seen by comparing the number of bedrooms to inhabitants. In 2011, the number of bedrooms exceeded that of inhabitants in more than 20,000 households in Denbighshire. This equated to 49.5% of all households. It included 3,500 households where there were four or five bedrooms and one or two inhabitants.

3.1.28 ‘Intermediate Housing’ is a home for sale or rent, provided at a cost above social rent, but below market levels. ‘Intermediate Rent’ refers to properties offered for rent at 80% of the level of market rent. There are a number of different intermediate products available, including shared equity, shared ownership and Homebuy. The figures for the past three financial years are recorded below in Table 7.

*Table 7: Delivery of Intermediate Homes. Source: Denbighshire’s LHMA, 2019.*

<b>Delivery of Intermediate Homes</b>		
<b>Financial year</b>	<b>Intermediate rented</b>	<b>Shared equity</b>
<b>2015/16</b>	3	0
<b>2016/17</b>	2	2
<b>2017/18</b>	2	24

3.1.29 In terms of ‘Social Housing’, Denbighshire has 5,821 homes. The majority are general needs stock (67%) and a quarter are sheltered accommodation, with a small amount of extra care and supported stock (Welsh Government, 2018). Less than 13% of stock is in one bedroomed accommodation. This limits the opportunities for tenants to downsize. Individuals receiving housing benefits are directly impacted by under occupation in their existing accommodation (the so-called ‘bedroom tax’).

3.1.30 The Local Housing Market Assessment 2019 has identified the need for 155 additional affordable housing units per annum, over the period 2018 to 2023. This is for social and intermediate housing.

**Trends:**

- Household growth rates are higher than population growth rates in Denbighshire.
- Home ownership in Denbighshire has become increasingly unattainable particularly for first time buyers.
- There are a lack of smaller homes and affordable homes in Denbighshire.

**Predicted Trend without an LDP:**

- With housing need outweighing supply, house prices will continue to increase and home ownership will be unattainable for the majority of working adults in Denbighshire.
- House building will be market driven and unrestricted so that it could occur in less sustainable locations.
- Market driven house building is likely to result in a greater number of larger detached dwellings which will not match the need for smaller dwellings.
- There would be no land specifically allocated for development which provides uncertainty to communities and developers; with each individual application having to be solely assessed against national policy.

**Access to services**

3.1.31 Access to services were assessed as part of the deprivation index in 2014 per Lower Super Output Area. The average private travel time to food shops, primary schools and post offices in Wales was 3 minutes, to GP surgeries it was 6 minutes and to secondary schools it was 9 minutes. Efenechtyd, Llanarmon-yn-Ial / Llandegla, Llanbedr Dyffryn Clwyd / Llangynhafal, Llanfair Dyffryn Clwyd / Gwyddelwern, Llanrhaeadr-yng-Nghinmeirch and Tremeirchion all exceeded the Welsh national average times in all five categories whilst Corwen 1, Llandrillo, Llandyrnog and Llangollen 1 exceeded the national Welsh

average in four categories, as can be seen in Table 8 below which is an extract.

Table 8: Accessibility to Services. Source: ONS, 2014

Accessibility to Services - Average private travel time in minutes to						
	Food shop	GP surgery	Primary School	Secondary school	Post office	Key
Wales	3	6	3	9	3	Yellow - Welsh National Average (WNA)
Bodelwyddan	3	9	3	10	2	Green - at or below WNA
Corwen 1	4	12	7	27	2	
Corwen 2	2	5	5	33	3	Orange - up to double WNA
Denbigh Central	2	1	3	4	1	
Denbigh Lower 1	2	5	3	3	2	Bright red - between double & triple WNA
Denbigh Lower 2	1	4	2	3	2	
Denbigh Lower 3	3	5	3	3	3	
Denbigh Upper / Henllan 1	2	3	2	5	2	Dark red - between triple & quadruple WNA
Denbigh Upper / Henllan 2	6	6	2	9	2	
Dyserth 1	2	2	3	14	1	Very dark red more than quadruple WNA
Dyserth 2	3	4	3	10	2	
Efenechtyd	9	17	7	22	8	
Llanarmon-yn-Ial / Llandegla	8	17	6	20	7	Very dark red more than quadruple WNA
Llanbedr Dyffryn Clwyd / Llangynhafal	11	12	5	11	5	
Llandrillo	15	16	8	31	2	
Llandyrnog	10	14	3	13	5	
Llanfair Dyffryn Clwyd / Gwyddelwern	10	15	6	20	7	
Llangollen 1	5	7	12	9	4	
Llangollen 2	3	4	5	6	2	
Llangollen 3	3	4	6	6	2	
Llanrhaeadr-yng-Nghinmeirch	13	16	6	16	11	
Ruthin 1	2	4	2	7	3	
Ruthin 2	2	2	2	4	2	
Ruthin 3	5	4	3	4	3	
St. Asaph East	2	4	2	2	1	
St. Asaph West	2	2	3	5	2	
Trefnant	4	11	3	8	3	
Tremeirchion	9	11	5	11	8	

**Trends:**

- The pattern of deprivation is reversed in respect of accessibility where the remoter rural areas of Denbighshire are more deprived than the urban areas of the County.

**Predicted Trend without an LDP:**

- Growth in rural and open countryside would still be restricted and could increase inaccessibility. New development would not be directed to sustainable, serviced locations.
- Rural shops and services would not be locally protected.

**Welsh Language**








3.1.32 TAN 20, paragraph 3.1.3 requires that a Welsh language assessment should form part of the sustainability appraisal and be considered as part of the site selection. This is so that planning applications should not routinely be subject to Welsh language impact assessments.

3.1.33 The 2011 Census shows that 22,236 people in Denbighshire can speak Welsh, which equates to 24.6% of the population. The total number of Welsh speakers in 2001 was 23,760, which is 26.4% of the population. Over a ten year period there has been a drop of 1,524 in the number and 1.8% in the percentage of Welsh speakers in the County. In the year 2017 to 2018 there has been a slight increase in that 24.7% of adults speak Welsh and 11.7% of adults have some Welsh speaking ability, according to the National Survey Welsh Language Indicator.

3.1.34 The ability to speak Welsh has increased in terms of school age individuals, but decreased in the remainder of age groups between 2001 and 2011 as can be seen in the Table 9 below.



Table 9: Ability to speak Welsh by age category. Source: ONS, Census 2001 and 2011

Age	Ability to speak Welsh		
	Census 2001	% Change	Census 2011
3 – 4	19.6%	 +8%	27.6%
5 – 15	43.2%	 +2.7%	45.9%
16 - 19	34.0%	 - 4.1%	29.9%
20 - 44	22.6%	 - 0.3%	22.3%
45 – 64	21.5%	 - 3%	18.5%
65 – 74	24.7%	 - 5.3%	19.4%
75+	25.9%	 - 2.2%	23.7%

3.1.35 This reflects the fact either that there are more parents or members of the extended family who speak Welsh at home with their children, or that there are more children attending ‘Ti a Fi’ groups, Welsh medium nursery groups, or speaking Welsh in school.

3.1.36 The data that is available for the 2001 Census is in 2003 standard table wards which combined statistical wards (electoral wards as of May 2003) where there were fewer than 1,000 residents or 400 households. This was compared to 2011 Census data where the 2011 electoral wards were used. Total ward population figures and the number of people who had one of more skills in Welsh, were available in the 2001 and 2011 Census. The electoral wards were combined for Denbigh, Prestatyn, Rhyl and St Asaph to provide the percentage figures of Welsh speakers in Table 10 below. Electoral wards Denbigh Upper / Henllan and Prestatyn Meliden are taken to represent Henllan and Meliden respectively. The electoral wards have then been ranked out of 21 for 2001 and 2011 to provide an indication of the location of most Welsh speakers.

Table 10: One or more skills in Welsh by ward. Source: ONS, Census 2001 & 2011

Electoral Ward	Rank in County	One or more skills in Welsh			Rank in County
	2001	Census 2001	% Change	Census 2011	2011
Bodelwyddan	19	27%	+ 2 %	29%	19
Corwen	3	63%	- 1 %	62%	3
Denbigh	7	57%	- 3 %	54%	7
Dyserth	15	32%	+ 2 %	34%	15
Efenechtyd	5	59%	+ 4 %	63%	2
Henllan	9	54%	- 5 %	49%	9
Llanarmon-yn-Ial / Llandegla	13	37%	+ 1 %	38%	13
Llanbedr Dyffryn Clwyd / Llangynhafal	10	46%	+ 1 %	47%	10
Llandrillo	1	73%	- 6 %	67%	1
Llandyrnog	8	54%	- 2 %	52%	8
Llanfair Dyffryn Clwyd / Gwyddelwern	4	63%	- 4 %	59%	5
Llangollen	16	32%	0%	32%	16
Llanrhaeadr-yng- Nghinmeirch	2	67%	- 6 %	59%	4
Meliden	18	28%	+ 1 %	29%	18
Prestatyn	21	22%	+ 1 %	23%	20
Rhuddlan	17	32%	- 2 %	30%	17
Rhyl	20	23%	- 1 %	22%	21
Ruthin	6	57%	0%	57%	6
St Asaph	14	35%	- 1 %	34%	14
Trefnant	11	44%	- 3 %	41%	11
Tremeirchion	12	41%	- 1 %	40%	12

3.1.37 Llandrillo had the highest percentage of people with the ability to speak Welsh in 2001 and 2011. The lowest number of Welsh speakers were in Prestatyn in 2001 and Rhyl in 2011.

3.1.38 In order to consider whether there are any trends, which could relate to development and the migration of people, the population figures of the electoral wards have been assessed to calculate the percentage change in population. This has then been compared with the percentage change in the population's ability to speak Welsh. This information can be seen in Table 11 below.

Table 11: Welsh ability and population trend. Source: ONS, Census 2001 and 2011

Electoral Ward	Percentage change between 2001 and 2011 in		Traffic Light for	
	Welsh abilities	Population	Welsh abilities	
Bodelwyddan	2%	2%	<b>Green</b>	Matched increases.
Corwen	-1%	-3%	<b>Orange</b>	Declining Welsh abilities at a slower rate than the population.
Denbigh	-3%	4%	<b>Red</b>	Population increase whilst a reduction in Welsh abilities.
Dyserth	2%	-11%	<b>Green</b>	Declining population whilst increasing number of Welsh speakers.
Efenechtyd	4%	3%	<b>Green</b>	Greater increase in Welsh abilities than in the population growth.
Henllan	-5%	1%	<b>Red</b>	Population increase whilst a reduction in Welsh abilities.
Llanarmon-yn-Ial / Llandegla	1%	10%	<b>Red</b>	Population increase at ten times the level of the increase in Welsh speakers.
Llanbedr Dyffryn Clwyd / Llangynhafal	1%	-8%	<b>Green</b>	Declining population whilst an increasing number of Welsh speakers.
Llandrillo	-6%	1%	<b>Red</b>	Population increase whilst a reduction in Welsh abilities.
Llandyrnog	-2%	4%	<b>Red</b>	Population increase whilst a reduction in Welsh abilities.
Llanfair Dyffryn Clwyd / Gwyddelwern	-4%	-1%	<b>Red</b>	Welsh abilities declining more significantly than the population.
Llangollen	0%	5%	<b>Red</b>	Population increase with no change in Welsh abilities.
Llanrhaeadr-yng-Nghinmeirch	-8%	-2%	<b>Red</b>	Welsh abilities declining more significantly than the population.

Meliden	1%	-5%	<b>Green</b>	Declining population whilst increasing number of Welsh speakers.
Prestatyn	1%	2%	<b>Orange</b>	Population increase at double the rate of increasing Welsh abilities.
Rhuddlan	-2%	-13%	<b>Green</b>	Declining Welsh abilities at a significantly slower rate than the population.
Rhyl	-1%	1%	<b>Red</b>	Population increase whilst reduction in Welsh abilities.
Ruthin	0%	4%	<b>Red</b>	Population increase with no change in Welsh abilities.
St Asaph	-1%	-3%	<b>Orange</b>	Declining Welsh abilities at a slower rate than the population.
Trefnant	-3%	6%	<b>Red</b>	Population increase whilst reduction in Welsh abilities.
Tremeirchion	-1%	3%	<b>Red</b>	Population increase whilst reduction in Welsh abilities

3.1.39 It is not possible to provide a more detailed analysis of the link between population numbers and Welsh language given that the data is not captured in similar categories.

3.1.40 The 2017 Housing Occupancy Survey included questions on the Welsh speaking abilities of residents in new build homes. It found that Welsh speaking households are slightly more likely to have moved from within Wales than households that do not speak Welsh. It concluded that the percentage figures of Welsh speakers in new developments were similar to the 2011 Census with 23.1% of the population having intermediate or fluent skills in Welsh in 2017 compared to 24.6% in the 2011 Census.

3.1.41 There is no clear trend between an increase in the population and its impact on the number of Welsh speakers. This is not surprising as the population does not only increase from births but from inwards migration from within Denbighshire, Wales and further afield. Similarly where there is new development, the residents and employees also migrate to it from within Denbighshire, Wales and further afield. There can be both inwards and outwards migration. Therefore, it is also not possible to predict a trend between the creation of new development

and its impact on Welsh speakers, which could be both positive and negative.

3.1.42 Areas where there are a high number of Welsh speakers can be described as sensitive and the development which occurs in those locations should be scrutinised. Significant, large scale developments in small rural communities could have negative impacts on the cohesion of those communities, if the development is disproportionate to the size of the existing settlement.

**Trends:**

- There appears to be a reversal of the trend of decreasing Welsh speakers in 2017-2018.

**Predicted Trend without an LDP:**

- An LDP can set out the location of development and assess whether there will be an impact on Welsh language. Without an LDP there will be no assessment and development cannot be directed to sustainable locations.

**Social Sustainability Issues and Revised SA Objectives**

3.1.43 The sustainability objectives for the adopted LDP were reviewed in 2017 in a scoping report and considered appropriate. It is now evident, from re-considering the social baseline that revised objectives are required to ensure that provision is made in the Replacement LDP to direct development, so that everyone has appropriate housing and that developers, together with communities, are encouraged to consider the communities' wellbeing, so that deprivation can be tackled. In reducing deprivation, it is appropriate to consider, the availability of open spaces to facilitate exercise, how people access services and encourage the use of non-carbon modes of transport. The Replacement LDP will set out the location of new developments, to ensure that they are positioned where services are accessible, do not have a negative impact on infrastructure, as well as encouraging the development of high quality open space and green infrastructure.

3.1.44 It is accepted that buildings and communities can be designed to be safer, and this should be a consideration of every detailed planning proposal. The objective in respect of reducing crime rates has been amended and widened to look at improving health and wellbeing.

3.1.45 The sustainability objectives will therefore be revised to:-

**Objective 1:** Everyone lives in homes that meet their needs.

**Objective 2:** Communities are healthier.

**Objective 3:** Denbighshire has high quality green and blue infrastructure and open space.

**Objective 4:** Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.

**Objective 5:** Denbighshire has an increasing number of Welsh speakers.

**Objective 9:** The environment is diverse, attractive and facilitates the wellbeing of all living creatures including plants.

### III.II Economic Baseline

#### **Employment / Unemployment**

3.2.1 Up to date employment deprivation data is available by Lower Super Output Area (LSOA) from the DWP for 2016 / 2017. This indicates that Rhyl West 2 has the highest level of employment deprivation in the year 2016-2017 at 45% of the working age of the population receiving employment related benefits. This is over four times the Welsh average figure of 10%. It is followed by Rhyl West 1 at 33%, Rhyl East 3 at 26%, Rhyl West 3 at 25%, Rhyl South West 2 at 23%, Rhyl South West 1 at 22% and then Denbigh Upper / Henllan at 19%. The best performing wards are Llanbedr Dyffryn Clwyd and Tremeirchion at 3%.

3.2.2 23 out of the 58 wards exceed the Welsh average percentage of people receiving employment related benefits in 2016 / 2017.

3.2.3 Rhyl West 2 has the highest level of deprivation in Denbighshire and the highest percentage of people receiving benefits in Rhyl West 2 is

at the 35 to 39 age bracket, which is at 74%, more than seven times the average figure for Wales at 10%. The age bracket of 40 to 44 is also high at 62%. With the exception of ages 16 to 18 (at 12%) all the age groups within Rhyl West 2 exceed 33%.

- 3.2.4 With the exception of 12 LSOAs, including Rhyl West 2, the highest level of deprivation within the LSOAs are between ages 45 and 64. The exceptions have some employment deprivation in the younger age groups of their LSOA's population, particularly in Denbigh Upper / Henllan at ages 25 to 29 and 30 to 34, Rhuddlan 1 at ages 25 to 29, Ruthin 2 at ages 40 to 44, Prestatyn East and Ruthin 3 at ages 19 to 24, Corwen 1, Llandyrnog, Efenechtyd, Llanarmon-yn-Ial / Llandegla, Llanrhaeadr-yng-Nghinmeirch at ages 30 to 34 and Llanbedr Dyffryn Clwyd at ages 25 to 29 and 30 to 34.
- 3.2.5 Overall Denbighshire has a higher percentage of people aged 19 to 24, 30 to 34, 40 to 49 and 55 to 64 claiming unemployment benefits than the Welsh average. Denbighshire does not fall below the Welsh average in any category, but does match it in the age groups 16 to 18, 25 to 29 and 50 to 54.
- 3.2.6 The number of unemployed people within the County has fallen significantly in recent years but the number of jobs within the County has not seen comparable growth. The benefits claimant count in November 2013 was 1,930 and has subsequently fallen to 950 in November 2016. (DWP, 2016).
- 3.2.7 Despite a number of methodological changes, the estimate for the number of employee jobs within the County has remained around 37,000 since 2009. There is no increasing demand for labour. (ONS, 2015).
- 3.2.8 The types of jobs in Denbighshire can be seen in the Table 12 below, which summarises the ONS, Business Register and Employment Survey data for 2016.

Table 12: Employee jobs in Denbighshire. Source: ONS, Business Register and Employment Survey, 2016.

<b>Employee jobs (2016)</b>	<b>Denbighshire (Employee Jobs)</b>	<b>Denbighshire (%)</b>	<b>Wales (%)</b>	<b>Great Britain (%)</b>
Total Employee Jobs	37,000	-	-	-
Full-Time	23,000	62.2	65.2	67.8
Part-Time	15,000	40.5	34.8	32.2
<b>Employee Jobs By Industry</b>				
B : Mining & Quarrying	20	0.1	0.2	0.2
C : Manufacturing	3,000	8.1	11.4	8.1
D : Electricity, Gas, Steam & Air Conditioning Supply	40	0.1	0.6	0.4
E : Water Supply; Sewerage, Waste Management & Remediation Activities	175	0.5	0.9	0.7
F : Construction	2,500	6.8	5.5	4.6
G : Wholesale and Retail Trade; Repair Of Motor Vehicles & Motorcycles	5,000	13.5	15.1	15.3
H : Transportation & Storage	1,000	2.7	2.9	4.9
I : Accommodation & Food Service Activities	4,000	10.8	8.9	7.5
J : Information & Communication	600	1.6	2.3	4.2
K : Financial & Insurance Activities	350	0.9	2.3	3.6
L : Real Estate Activities	700	1.9	1.6	1.6
M : Professional, Scientific & Technical Activities	1,250	3.4	4.2	8.6
N : Administrative & Support Service Activities	2,000	5.4	6.6	9.0
O : Public Administration & Defence; Compulsory Social Security	2,000	5.4	6.8	4.3
P : Education	3,500	9.5	10.1	8.9
Q : Human Health & Social Work Activities	10,000	27.0	16.1	13.3
R : Arts, Entertainment & Recreation	600	1.6	2.5	2.5
S : Other Service Activities	600	1.6	1.5	2.1
Source: ONS Business Register and Employment Survey : open access (2017) Notes: % is a proportion of total employee jobs excluding farm-based agriculture. Employee jobs excludes self-employed, government-supported trainees and HM Forces. Data excludes farm-based agriculture.				

3.2.9 In Denbighshire, employment in the high skills, high wage sectors of information & communication, finance & insurance, professional, scientific & technical and business administration & support services is



relatively low, totalling just 11.3% compared to 15.4% in Wales and 25.4% in Great Britain.

3.2.10 Reliance on public sector employment is relatively high, accounting for 28% of employment in the County compared to 26% for Wales and 18% for Great Britain. This difference is mainly driven by employment in the health sector, primarily due to the presence of Ysbyty Glan Clwyd in Denbighshire.

3.2.11 Manufacturing is equal to the Great Britain level at 8%. Employment in the accommodation & food sector are above the national figure at 10.8% compared to 8.9% in Wales and 7.5% in Great Britain.

3.2.12 The proportion of self-employed individuals is relatively high, equating to about 6,800 or 11.0% in Denbighshire (compared to 9.2% for Wales as a whole and about 10.2% for Great Britain).

3.2.13 Gross Value Added (GVA) is an indicator of productivity, it is the measure of the value of goods and services. GVA per head in Denbighshire is lower than that of North Wales and Wales, as can be seen in the Table 13 below. The data is from ONS' Regional Accounts and 2017 data is currently provisional.

*Table 13: Productivity by Gross Value Added in Denbighshire. Source: ONS, Regional Accounts, 2017.*

<b>Year</b>	<b>Denbighshire</b>	<b>North Wales</b>	<b>Wales</b>
2015	£17,319	£19,170	£18,692
2016	£17,784	£19,884	£19,368
2017	£17,886	£20,753	£19,899

3.2.14 Denbighshire is a net exporter of employees with more workers commuting out of the County than those in commuting (Employment Land and Economic Growth Assessment, 2019).

3.2.15 Given that there is no increasing demand for labour in Denbighshire, there is a reliance on public sector employment and a significant number of part-time workers (40.5% compared to Wales as a whole at

34.8% and Great Britain at 32.2%). There is a need for an increase in economic activity so that there is sufficient resilience in the County to respond to global economic downturn. This is supported by the employment deprivation data above; the fact that incomes have only, within the last 3 years, started to recover from the 2008 / 2009 economic crisis (2018 CACI Paycheck data) and that there is an aging population with outwards migration of the 16 to 29 age groups at about 200 a year.

3.2.16 The Growth Vision for the Economy of North Wales (July 2016) is a single, joined-up vision for economic and employment growth for North Wales. It was prepared by North Wales Economic Ambition Board and it identifies energy, advanced manufacturing and digital sectors as high value economic clusters. These clusters are likely to benefit from further funding programmes and form part of the Growth Deal proposal with the United Kingdom and Welsh Government.

3.2.17 The forecasted growth rate for the regional economy is 1.9% between 2016 and 2035, based on current trends. The value of the economy would increase by 56% in less than 20 years. It is also estimated that such growth levels will generate at least an additional 120,000 new employment opportunities. (North Wales Economic Ambition Board, 2016). Such levels of growth will not only impact on the local infrastructure but also have implications for additional housing need to be considered for the Replacement LDP.

### **Employment Land / Businesses**

3.2.18 An Employment Land and Economic Growth Assessment (ELEGA) has been undertaken in 2019.

3.2.19 The Assessment was undertaken in accordance with TAN 23. It notes that in 2017 there was a flow of working individuals commuting in and out of Denbighshire from / to Conwy, Flintshire and Wrexham. Denbighshire was more dependent on public sector employment than Wales as whole, with a focus on the health sector. 9% of residents were

employed in manufacturing, servicing, information and communication technologies as well as professional and business support services.

- 3.2.20 Stakeholders consulted on ELEGA reported a shortage of industrial and warehouse units of all sizes, although the most common units within the County are up to 500 square metres. St Asaph Business Park provides office space at a variety of sizes, up to 1,500 square metres, however, sites suitable for offices elsewhere within Denbighshire are more limited. Bodelwyddan is a strategic site for Denbighshire and together with St Asaph it is the main strategic offering for inward investment and employment land development. There is competition with surrounding authorities and sites, particularly Broughton, Deeside. A specialist focus is recommended to secure investment.
- 3.2.21 The ELEGA recommends 47.60 hectares of employment land for the Replacement LDP to 2033. It indicates that there is a realistic supply of 68.6 hectares of employment land available in Denbighshire, which includes 65.5 hectares of land already identified and that 3.1 hectares of new land in Corwen.
- 3.2.22 In Denbighshire, according to Business Demography, ONS (2017) the provisional figures indicate there are 3,400 active enterprises, including 310 new enterprises; however, 350 enterprises closed, 40 more than those that started up. 3,400 active enterprises equates to 615 enterprises per 10,000 of the population aged 16 to 64, which is higher than the Welsh figure of 535 and the North Wales figure of 574. It is also higher than all of the surrounding local authorities, other than Conwy, who is just ahead at 622 enterprises per 10,000 of the working age population. Progress has also been made on past years. In 2016 where there were 3,385 active enterprises, whilst in 2015 there were 3,330.

## **Town Centre Retail**

- 3.2.23 Retail plays an important economic role within the County; being one of the largest employers of people locally. The majority of retail facilities are located in the eight main settlements: Rhyl, Prestatyn, Rhuddlan, St Asaph, Denbigh, Ruthin, Corwen and Llangollen. Small-scale retail is also supported in the villages, which can play a vital economic and social role to their local communities.
- 3.2.24 According to the 2018 Town Centre Health Check, the percentage of vacant units in 2017, in:
- Corwen was 24%,
  - Denbigh was 14%,
  - Llangollen was 4%,
  - Prestatyn was 8%,
  - Rhuddlan was just under 8%,
  - Rhyl was 20%,
  - Ruthin was 8% and
  - St Asaph was just over 14%.
- 3.2.25 Although historically there has been a focus on retail, it is also acknowledged that town centres fulfil a multitude of functions, not only for residents, but day-visitors and holiday-makers alike. Planning Policy Wales (PPW) encourages local planning authorities to focus on town centre diversification with retail remaining a principal function. Town centres are considered to be the most sustainable locations for new retail development, because they can be accessed by a larger number of people using public transport.
- 3.2.26 There are a number of out-of-town centre retail developments that provide an important contribution to the County's overall retail offer, for example Tweedmill Factory outlet and Clwyd Retail Park.
- 3.2.27 The largest change in the retail development of the County is 'Parc Prestatyn' shopping park, which includes a number of national retail-chains such as Tesco, Marks & Spencer, Next, Sports Direct and River Island. This development has greatly increased the attractiveness of

the town as a retail centre, but at the same time has seen the closure of some key anchor retailers in Rhyl.

- 3.2.28 Denbighshire County Council are working to regenerate Rhyl by focusing on activities that increase footfall and attract more economically active residents rather than focusing on retail.

### **Tourism**

- 3.2.29 Denbighshire has a diverse tourism offering, from the coastal resorts of Rhyl and Prestatyn, to the wealth of attractive market towns in the Vale of Clwyd. Tourism is set within a high quality environment and Denbighshire has a growing reputation in the outdoor activity sector. High quality development proposals that support and enhance the visitor economy of the County will be supported and encouraged by the Council.
- 3.2.30 Tourism plays an important part in Denbighshire's economy and the sector continues to grow. It currently accounts for 10% of employment in Denbighshire. This represents approximately 5,000 jobs, although many of the jobs in this sector tend to be seasonal and lower paid. Overall revenue generated from tourism for Denbighshire in 2014 was nearly £428 million with over 5 million people visiting the County that year. The 2017 STEAM economic impact figures show that tourism generated £490.35 million in Denbighshire, which supported 6,231 jobs in the tourism sector. The data indicated that there were 5.93 million visitors and out of those 1.5 million visitors stayed overnight in the County.
- 3.2.31 The coastal resorts of Rhyl and Prestatyn have long been dominated by the visitor economy, traditionally attracting large numbers of both staying and day visitors. Both have largely failed to respond to the changes in the visitor market and have limited appeal to those seeking new types of visitor experience. It is essential that these towns position themselves to attract new and growing tourism markets in the future.

- 3.2.32 On-going initiatives, to regenerate Rhyl, are beginning to have significant effects in terms of improving the natural and built environment. This will ultimately lead to increased economic prosperity. A new Premier Inn has been developed. Waterfront development projects are under construction that include refurbishment of the Pavilion Theatre, construction of a Travel Lodge and public house, together with an aquatic centre and active leisure zone.
- 3.2.33 The outdoor activity sector has significant potential to grow within Denbighshire. There is an area of outdoor activity specialism building up around the Clwydian Range and Dee Valley, Area of Outstanding Natural Beauty, as well as in the Llandegla area, Hiraethog Moors and Llyn Brenig areas. The specialism is based on the offering of mountain biking and the availability of shooting centres across the County. Expenditure by participants in outdoor activities is often high.

### **Transport**

- 3.2.34 Local transport networks, i.e. structure and modal split, are often influenced and shaped by the population distribution in an area, trade relations between business enterprises and geomorphologic conditions.
- 3.2.35 Denbighshire is 844 km<sup>2</sup> with an urbanised coastal strip around the coastal hubs of Prestatyn and Rhyl and a predominantly inland rural area with a number of locally important market towns and villages south of the A55 transport corridor.
- 3.2.36 The dichotomy between the urbanised coastal strip and mainly rural hinterland is also reflected in the public transport network of the County. The seaside towns of Prestatyn and Rhyl have well-established rail links via the North Wales Coast main railway line. There are train services to Holyhead (and the ferry port to Dublin), Llandudno and

Wrexham in North Wales, Cardiff in South Wales, as well as London and Manchester (and the airports) in England.

3.2.37 In Denbighshire's rural area, public transport is dominated by bus and is primarily focussed on serving the market towns in the Vale of Clwyd.

3.2.38 Three main roads cross the County, which are part of the national trunk road network. The A55 forms an important transport route for all towns located alongside the coast in North Wales. Moreover, it is also part of the Euro Route E22 that links Scandinavia with Great Britain and Ireland. Like the A55 in the north, the A5 is a nationally important transport route for the market towns in the south of Denbighshire. It joins the A55 at Bangor and runs down to Shrewsbury where it joins the M54; thereby linking London with Holyhead on the Isle of Anglesey. The A494 runs from the Chester area and M56 in the east, through the market towns of Ruthin and Corwen, before continuing on to Dolgellau in the south west.

3.2.39 The County also has important roads that serve it including the A525 that runs from Rhyl in the north to Llandegla in the south and onto Wrexham and Newcastle under Lyme.

3.2.40 There have not been any new roads in the County although there have been improvements to the transport infrastructure which has focused on providing and updating active travel routes. In 2016 / 2017 there were new sections of active travel routes between Denbigh and Henllan, to the rear of Tesco in Ruthin and to the front and rear of Ysgol Brynhyfryd in Ruthin.

3.2.41 The focus of the Council will continue to be to provide safe and accessible transport routes to include safeguarding green infrastructure, paths and dismantled railway lines to assist in extending active travel networks. The North Wales Joint Local Transport Plan is due for renewal in 2020 and Denbighshire County Council will contribute to the consideration of development proposals of a significant scale in the region.

## Economic Sustainability Issues and Revised SA Objectives

3.2.42 The economic trends and predicted trends are set out below:-

### **Trends:**

- Out-migration of 16 to 29 year olds and decreasing working population.
- Reliance on public sector employment.
- A reduced focus on retail development and a more holistic approach to increasing footfalls in towns.
- Tourism is a significant contributor to Denbighshire's economy.

### **Predicted Trend without an LDP:**

- No allocated employment land and therefore only limited ability to direct economic development to or within Denbighshire.
- Continued out-migration amongst young adults and a decreasing working population.
- Increased inappropriate tourist accommodation with detrimental impacts on the landscape, housing provision, economy and for biodiversity.

3.2.43 The sustainability objectives for the adopted LDP were reviewed in 2017 in a scoping report and considered appropriate. Re-considering the economic baseline has shown that revised objectives are required, to ensure that the local economy is invigorated, that the impact of tourism is considered and that town and rural centres become resilient so that they can adapt in difficult economic times.

3.2.44 Land can be allocated for specific types of development in the Replacement LDP, including employment land, to encourage development in locations that will not migrate people away from town or rural centres and access employment opportunities. The Replacement LDP will include local policies which actively encourage rural tourism whilst balancing the impact of seasonal work.

3.2.45 The sustainability objectives will therefore be revised to:-



**Objective 6:** There is a strong local economy and successful regeneration.

**Objective 7:** Denbighshire's town and rural centres are not in decline.

### III.III Environmental Baseline

#### **Landscape, Agriculture and Soil**

- 3.3.1 Denbighshire is a predominantly rural County with large areas of agricultural land and an urban coastline. The agricultural grade of land within the County is generally high in the north and along the Vale of Clwyd, with lower grade agricultural land in the south.
- 3.3.2 As part of preparation for the adopted LDP, three sites were resurveyed in 2006 / 2007 at a scale of 1:12,000. These represented the potential locations of strategic sites. The results of the surveys were broadly:
- Rhyl: A combination of grade 2, 3a and 3b,
  - Bodelwyddan: A combination of grade 3a and 3b,
  - St Asaph: Grade 3b only
- 3.3.3 Since 2018, a predictive Agricultural Land Classification map has been made available on [www.lle.gov](http://www.lle.gov). It was derived from soils data from Cranfield University. It provides an indication of the classification of land as can be seen on the map below, Figure 7.

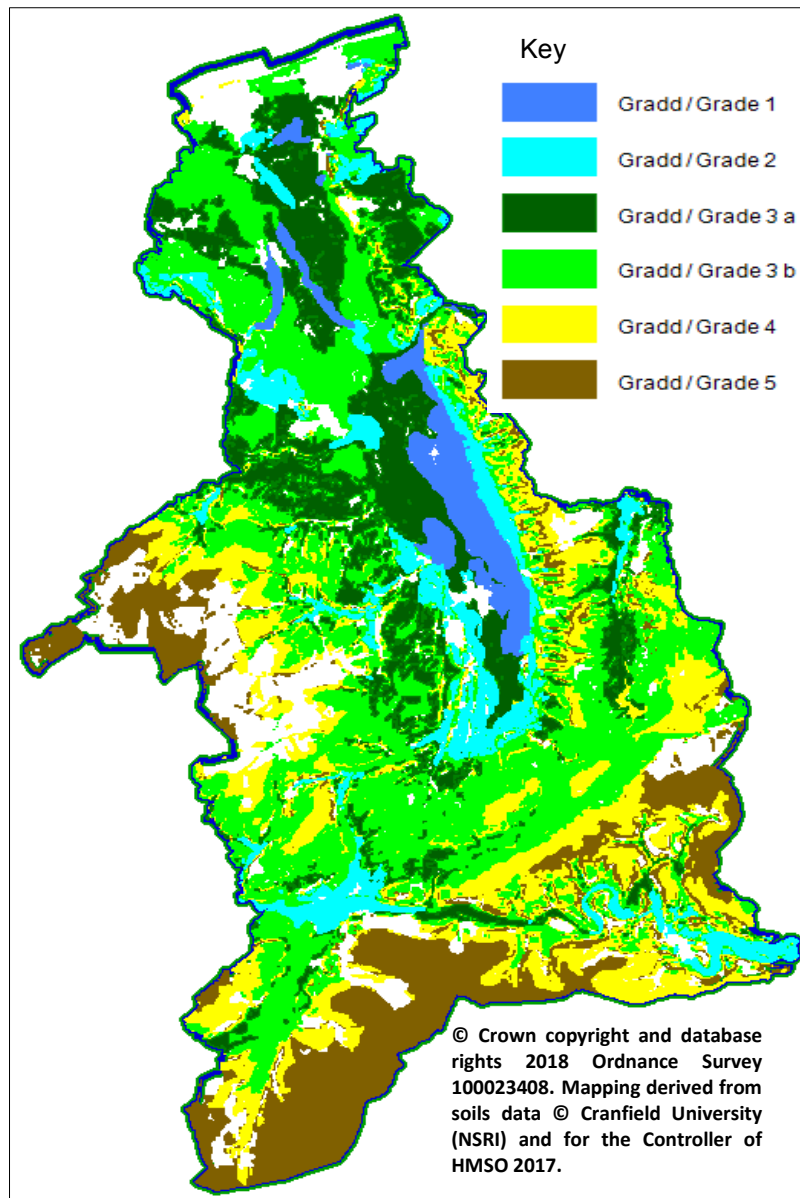


Figure 7: Predictive Agricultural Land Classification of Denbighshire. Source: OS with soils data from Cranfield University, 2017.

- 3.3.4 Large areas of Denbighshire are designated for their landscape value, including the Clwydian Range and Dee Valley AONB and AOB. Landmap classifies significant areas of the County as being visually outstanding as well as numerous areas as outstanding in in terms of cultural landscape.
- 3.3.5 Denbighshire has a number of statutory and non-statutory conservation sites, (Table 14). Species/habitats previously protected by the UK Biodiversity Action Plan are now addressed through the

Environment (Wales) Act 2016, nevertheless, biodiversity within the County has declined over the last century and requires protection.

3.3.6 The statutory international, national and local sites, together with the AONB can be seen in Figure 8 below.

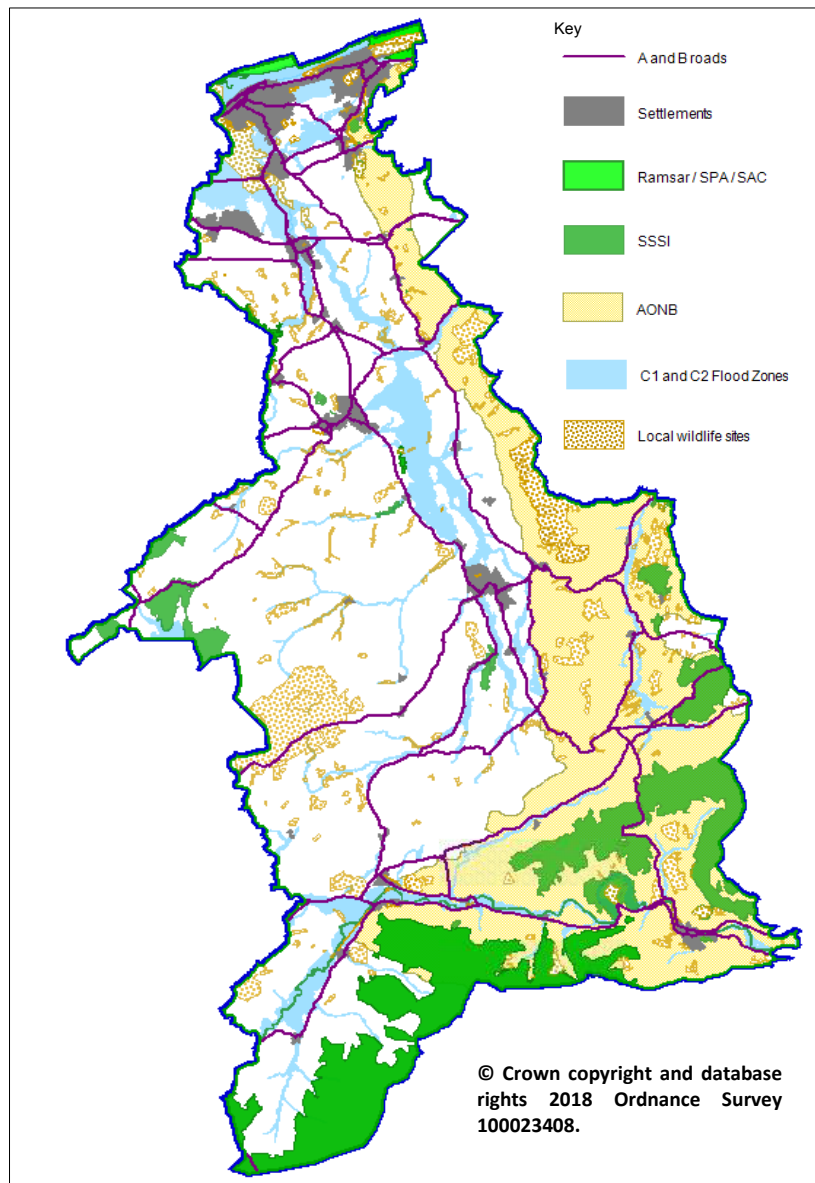


Figure 8: Statutory and non-statutory nature conservation designations in Denbighshire.

Table 14: Statutory and Non-statutory Nature Conservation Sites in or in close proximity to Denbighshire

Scale	Title		Designation
International	The Dee Estuary		• Ramsar Site • SPA • SAC
	Berwyn		Special Protection Area (SPA)
	Liverpool Bay		
	Llwyn		Special Area of Conservation (SAC)
	Elwy Valley Woods		
	Alyn Valley Woods		
	Berwyn and South Clwyd Mountains		
	River Dee and Bala Lake		
	Halkyn Mountain		
	Deeside and Buckley Newt sites		
National	Berwyn	Bryn Alyn	Sites of Special Scientific Interest (SSSIs)
	Caeau Pen y Coed	Cefn Rofft	
	Chwarel Pant Glas	Clogau Quarry	
	Cil-y- Groeslwyd Woods, Eyarth Woods and Rocks and Craigddwywynt		
	Coedydd ac Ogofau Elwy a Meirchion		
	Coed Nant Mawr	Crest Mawr Wood	
	Coedydd Dyffryn Alwen	Cynwyd Forest Quarry	
	Dee Estuary	Dinas Bran	
	Fynnon Bueno and Cae Gwyn Caves	Gronant Dunes and Talacre Warren	
	Graig Fawr	Graig Quarry	
	Graig, Llanarmon-yn-Ial	Hendre Bach	
	Llandegla Moor	Llwyn	
	Moel Hiraddug Quarries	Maes Hirradug	
	Mwyngloddfa Pennant	Mynydd Hiraethog	
	Prestatyn Hillside	Penarth Quarry	
	Ruabon / Llantysilio Mountains and Minera		
	Clwydian Range and Dee Valley Area		Area of Outstanding Natural Beauty
Y Berywn	Hafod Elwy Moor	Nature reserve	
Local	Moel Findeg	Gronant Dunes	Nature reserve
	Birckfields Pond	Rhuddlan Pond	
	Prestatyn Hillside		
	248 designated County Wildlife Sites		
	62 regionally important geological and geomorphological sites (RIGS).		

### **Heritage and Built Environment**

- 3.3.7 The built environment encompasses both the historic built environment and those aspects of the built environment which support the economy and society.
- 3.3.8 Denbighshire has a rich historic heritage which includes: 164 scheduled ancient monuments, 1,803 listed buildings, 32 conservation areas, 25 registered parks and gardens. Five areas of landscape have been included in the register of Historic Landscapes. The Pontcysyllte Aqueduct and Llangollen Canal was inscribed as a World Heritage Site in 2009. The condition of buildings of special architectural or historic interest are monitored and 148 have found to be 'at risk'.
- 3.3.9 Local policy criteria ensure that the historic environment is taken into account, during the determination of planning applications, will be included in the Replacement LDP. Historical Environment Records (which list, for example, non-statutory archaeological sites and findings) are used to guide appropriate planning advice and mitigation.

### **Finite Resources**

- 3.3.10 Denbighshire falls into two river basin districts, the Western Wales district, primarily covering the middle and North of the County and the Dee district, covering the South and some areas to the East of the County. There are no waterbodies within Denbighshire that have been classed as acid sensitive by Natural Resources Wales (NRW).
- 3.3.11 Bathing water quality is monitored in Denbighshire on an annual basis. In 2018, Prestatyn beach was rated as excellent, Marine Lake in Rhyl and Rhyl East were rated as good whilst Rhyl beach was rated as sufficient.
- 3.3.12 The use of minerals contributes towards the economy of Wales; however, the extraction of minerals can impact upon local communities and the environment. Minerals are a finite resource and can only be worked where they occur, presenting particular challenges in Denbighshire due to the distribution of mineral and its coincidence

with the Area of Outstanding Natural Beauty (AONB). The local planning authority will therefore seek to reduce the need for primary minerals through sustainable construction practices, and to maximise the use of recycled aggregates in preference to primary aggregates.

- 3.3.13 There remain a limited number of sand and gravel extraction sites within the sub-region, including Maes Mynan in Flintshire, near the Denbighshire border, which recently secured planning permission for an extension to provide an additional 659,000 tonnes of sand and gravel.
- 3.3.14 The Bodfari / Denbigh area was considered suitable with the least constraints and with the most potential, in terms of the economics, of it being developed for mineral extraction. It has relatively good access to populated centres and likely users of the material. There are constraints associated with all significant deposits of sand and gravel; the most widespread being the visual impact.
- 3.3.15 Denbighshire does not have a history of coal working, most likely due to limited resources compared with Flintshire and Wrexham. Furthermore, there has been no pressure from the industry to work the coal in Denbighshire.
- 3.3.16 There are two areas of tertiary shallow coal resource in the Prestatyn / Dyserth area and the Trefnant / Henllan area; measuring 753 hectares and 76 hectares respectively. The coal resource in the Prestatyn / Dyserth area is predominantly located under the existing settlements of Prestatyn, Dyserth and Meliden. There are small areas that are undeveloped; however, their proximity to housing precludes them from development. MTAN 2 requires the retention of a 500 metre buffer between open cast coal mines and residential development.

### **Climate change and Flooding**

- 3.3.17 Climate change is predicted to have wide ranging impacts on the environment, including increasing the incidence of flooding, as well as placing pressure on biodiversity and water supplies. This is recognised within the County.
- 3.3.18 North Wales Combined Authority, of which Denbighshire is a member, has prepared a report on air quality in 2017. The Air Quality Progress Report 2017 indicates that the air quality in North Wales is good. The main source of air pollution in Denbighshire is road traffic emissions from major roads including the A55, A5 and A494. There are no automatic monitoring sites and no air quality management areas in Denbighshire. The only monitoring is of Nitrogen Dioxide.
- 3.3.19 In 2016 monitoring of NO<sub>2</sub> was undertaken using passive diffusion tubes at roadside, kerbside, industrial and urban locations including Ruthin, Denbigh, St Asaph, Rhyl and Prestatyn. Vale Street in Denbigh had the highest annual mean concentration (µg/m<sup>3</sup>) in 2016 at 33.1. This level is still below the annual mean air quality objectives of 40 µg/m<sup>3</sup> and the report concludes that the annual mean NO<sub>2</sub> concentration for North Wales fell below 10% of the annual mean NO<sub>2</sub> Air Quality Strategy objectives.
- 3.3.20 Denbighshire's air quality is on average better than Wales' as can be seen in Table 15 below.
- 3.3.21 An increase in road users or changes to the transport network will, however, have an impact on air quality. Any significant transport project in Denbighshire, should include an assessment of its impact on air quality.

Table 15: Air quality exposure indicators for Denbighshire and Wales. Source: Welsh Government, 2018, Department for Environment, Food and Rural Affairs and ONS.

<b>Air Quality Exposure Indicators</b>				
Average concentrations				
	<b>Year</b>	<b>NO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2-5</sub></b>
Denbighshire	2015	6	11	8
Wales	2015	10	12	8
Denbighshire	2016	7	10	7
Wales	2016	11	12	8
Denbighshire	2017	6	9	6
Wales	2017	9	10	7

3.3.22 A Strategic Flood Consequences Assessment (SFCA) was undertaken in 2018, in accordance with PPW, Edition 9, November 2016 and Technical Advice Note 15, by JBA Consulting on behalf of the County Council. The SFCA considered fluvial, coastal and surface water flooding issues and assessed the implication on existing development site allocations and communities. It also took account of climate change for a 0.1% AEP fluvial or tidal flood event as required by Welsh Government (2016): FCA Climate Change allowances.

3.3.23 The SFCA will be used to inform the Replacement LDP. It notes that there are extensive areas in Rhyl and Prestatyn, which are at risk from surface water flooding as a result of fluvial or coastal flooding. Rhuddlan is an area at risk of fluvial and tidal flooding and settlements with more widespread areas at risk of fluvial flooding are Ruthin, Denbigh, Bodelwyddan, St Asaph and Dyserth.

3.3.24 In considering the impact of climate change, an assessment of the impact of flooding has been undertaken, for breach scenarios at Prestatyn, Rhuddlan and Rhyl. The breach scenarios are set out below in Table 16:-



Table 16: Flooding Breach Scenarios. Source: SFA, 2016.

Settlement	Breach Location
Prestatyn	<p>Prestatyn Breach:</p> <p>Much of Prestatyn is low lying and potentially at risk from coastal flooding. The eastern end of the frontage at Prestatyn is comprised of dunes behind Barkby Beach with manmade seawalls present along the rest of the town frontage. The seawall heights range from 6.8 m AOD to 7.65 m AOD meaning overtopping is unlikely, except by isolated breaking waves. The area of dunes at Barkby Beach is potentially vulnerable and the transition from hard to soft defences has been identified as a potential location for a breach in the defences. The eastern end of the dunes around the outfall of Prestatyn Gutter is lower lying and at risk from overtopping during extreme tidal events such as the 0.1% AEP event.</p>
Rhyl	<p>Rhuddlan Marine Lake Breach:</p> <p>The eastern end of the Rhyl frontage towards the golf course is made up of low lying land protected by a seawall of &gt;7.0 m AOD. Along much of the remainder of the frontage there is higher ground &gt;7 m AOD immediately behind the promenade so there is little flood risk in this area. There is therefore little risk of the defences along the Rhyl frontage being overtopped.</p>
Rhuddlan	<p>Rhuddlan Marine Lake Breach, Rhuddlan Clwyd Breach:</p> <p>Two main tidal models exist that are designed to assess tidal risk to Rhuddlan. Tidal risk to Rhuddlan comes from the Clwyd Estuary, where the tidal influence extends upstream of Rhuddlan. The Tidal Clwyd Model considers tidal flooding from the Clwyd Estuary only whereas the Coastal Rhuddlan Model covers tidal flooding directly from the coastline and from the estuary. Two breach scenario models have also been designed to assess possible breaches at two locations.</p>
Bodelwyddan	<p>Bodelwyddan is known to suffer from fluvial flooding with the main risk thought to come from coastal sources.</p>

3.3.25 In addition to the sites listed above, Ruthin and St Asaph are also considered to be at risk of climate change, as they both have rivers running through most of their urban areas.

### Renewable Energy and Waste

3.3.26 The way in which we use resources is important, because it can help us address climate change, through reduction in the use of fossil fuels and the use of more sustainable energy sources. It can help contribute towards security of energy supply, by minimising the need for the importation of energy from other countries.

3.3.27 Denbighshire, along with the rest of Wales has historically relied on landfill to deal with waste. This has started to change particularly as the availability and affordability of landfill has significantly reduced in the past few years, as a result of the Landfill Directive and Landfill Tax. More recently Denbighshire has improved its recycling rates.

3.3.28 The Welsh strategy (Wales ‘Towards Zero Waste’ 2010) aims for a 27% reduction in waste by 2025 as against the position in 2007. It expects that by 2025, 30% of waste will be used for energy and no more than 5% of municipal waste will be sent to landfill.

3.3.29 Denbighshire has already achieved these targets as can be seen in Table 17 below.

*Table 17: Municipal Solid Waste 2015, 2016, 2017. Source: Welsh Government, 2015 and 2018*

	<b>2015</b>	<b>2016</b>	<b>2017</b>
Population	94,836	94,984	95,159
Tonnes of MSW collected	42,333	43,114	43,437
% of MSW tonnes compared to population	44.64%	45.39%	45.65%
% MSW sent to landfill	17.07%	4.47%	2.47%
% MSW recycled	62.42%	66.51%	66.39%
% MSW used for energy recovery	Not quantified	28.34%	30.39%
% other waste action	20.51%	0.67%	0.75%

3.3.30 To further increase recycling rates in the County, Denbighshire County Council recently announced a change to its non-recyclable household waste collection service. The change is due to be rolled out in 2021 and will result in household waste that is not suitable for recycling, being collected once every four weeks, rather than every two weeks.

3.3.31 The North Wales recycling rate for commercial waste, in 2012, was 68.3% and for industrial waste, it was 54%. The recycling targets for 2019 / 2020 are 67% for both commercial and industrial waste.

3.3.32 Within Denbighshire there are several facilities to generate energy from waste. There is Ruthin Combined Heat and Power (CHP), Rhualt CHP and an anaerobic digestion facility at St Asaph, with a further site, where planning permission has been approved, at Trefnant.

Furthermore, a large Energy from Waste plant has been announced at Parc Adfer, Deeside, Flintshire which is due to be operational in 2019.

3.3.33 Renewable energy must play a major role in our future energy production in order to meet the UK's targets for tackling climate change. This includes all types of low carbon generation as well as greater energy efficiency.

3.3.34 Paragraph 12.8.7 of Planning Policy Wales (PPW), Edition 9 (2016), defines renewable energy as 'the term used to cover those sources of energy, other than fossil fuels or nuclear fuel, which are continuously and sustainably available in our environment. This includes wind, water, solar, geothermal energy and plant material (biomass).' Low Carbon Energy developments are also considered an important part in decarbonizing the energy supply. Examples can include gas engine or gas turbine Combined Heat and Power (CHP), where the waste heat is usefully used e.g. from power stations or industrial processes.

3.3.35 In 2009, The Renewable Energy Directive set a target of 15% of energy consumption from renewable sources by 2020. The Cabinet Secretary for Energy, Planning and Rural Affairs, in September 2017, announced that by 2030 she wanted to generate 70% of Wales' electricity, from renewable sources, with 1 GW of it being locally owned. This ambition is repeated in Planning Policy Wales (Edition 10, 2018), which also requires local authorities to have an active role in delivering these targets.

3.3.36 The Welsh Government promises to optimise the development of renewable energy and combined heat and power systems, through the planning system, which will be facilitated by local planning authorities. Guidance for developers and planning authorities is provided in Welsh Government (2005), Technical Advice Note (TAN) 8: Planning for Renewable Energy.

3.3.37 TAN 8 designates Clocaenog Forest as a Strategic Search Area for onshore wind development in Denbighshire and Conwy with a capacity,

increased by Ministerial letter (July 2011), to 212 MW. Onshore wind developments that are over 25 MW should be located within Clocaenog Forest although this is a guide to facilitate development rather than constraining development to this location. Planning Policy Wales (Edition 10, 2018) states that there should be implicit acceptance that the landscape surrounding the strategic search area will change and although cumulative impact will continue to be a material consideration, it will also be balanced against Welsh Government's aspiration for renewable energy in Wales.

3.3.38 Within Denbighshire there are four large operational wind farms, including Brenig (recently operational), Tir Mostyn/Foel Goch, Derwydd Bach and Wern Ddu. Clocaenog wind farm is under construction and is due to be completed during 2019.

### **Environmental Sustainability Issues and Revised SA Objectives**

3.3.39 The environmental trends and predicted trends are set out below:-

#### **Trends:**

- Increasing development of renewable energy.
- Increasing amount of waste being recycled.
- Pressure on the environment and landscape from the limited ability to expand some settlements.
- Pressure on the environment and landscape from Welsh Government's ambition for the development of renewable energy.

#### **Predicted Trend without an LDP:**

- Uncontrolled development in the historic landscape, open countryside and on high quality agricultural land.
- Inappropriately sited development is likely to contribute to air pollution caused by additional road traffic.

3.3.40 It is therefore evident that Denbighshire's landscape, its statutory designations, local designations, high quality agricultural land, as well

as open space, continue to need to be protected and enhanced; with consideration not only being given to biodiversity, but also the quality of life for the people of Denbighshire. These sustainability issues can be accommodated as part of the policies of the Replacement LDP.

3.3.41 The sustainability objectives will therefore be revised to:-

**Objective 3:** Denbighshire has high quality green and blue infrastructure and open space.

**Objective 4:** Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.

**Objective 8:** Denbighshire's finite resources are utilised responsibly.

**Objective 9:** The environment is diverse, attractive and facilitates the wellbeing of all living organisms.

**Objective 10:** Denbighshire's landscape portrays its history, natural beauty and culture.











**Objective 11:** Denbighshire has high quality historic buildings, archaeological sites and culturally important features.

**Objective 12:** Local communities are resilient to the effects of climate change, including an increased risk of flooding.

### III.IV SA Objectives



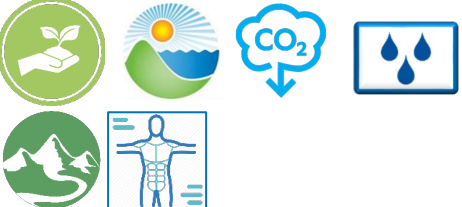






3.4.1 The SEA Directive and Regulations state that the SEA must consider certain topic areas, baseline indicators which are set out in Table 18 below. Each topic area has been allocated an icon so that it can be easily cross referenced.



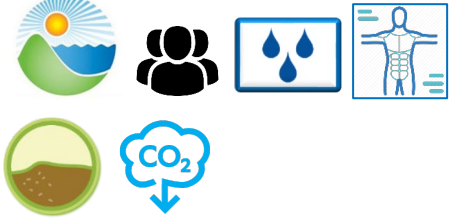
Table 18: SEA indicators

SEA indicator	Icon for SEA indicator
Biodiversity including flora and fauna	
Population	
Human health	
Soil (including waste and contaminated land issues)	
Water (water quality and resource)	
Air	
Climate factors (including strategic flood risk)	
Material assets (including geographical interests and infrastructure)	
Cultural heritage	
Landscape	

3.4.2 The proposed revised objectives have been developed in order to assess how the Replacement LDP will meet the criteria of the SEA Directive and contribute to sustainable development. The SA objectives have therefore been cross referenced to the SEA indicators as can be seen in Table 19 below.

Table 19: SEA indicators incorporated into SA Objectives.

SA Proposed Objective	SEA compliance
<b>Objective 1:</b> Everyone lives in homes that meet their needs.	
<b>Objective 2:</b> Communities are healthier.	
<b>Objective 3:</b> Denbighshire has high quality green and blue infrastructure and open space.	
<b>Objective 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.	
<b>Objective 5:</b> Denbighshire has an increasing number of Welsh speakers.	
<b>Objective 6:</b> There is a strong local economy and successful regeneration.	
<b>Objective 7:</b> Denbighshire's town and rural centres are not in decline.	
<b>Objective 8:</b> Denbighshire's finite resources are utilised responsibly.	
<b>Objective 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.	

<p><b>Objective 10:</b> Denbighshire’s landscape portrays its history, natural beauty and culture.</p>	
<p><b>Objective 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.</p>	
<p><b>Objective 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.</p>	

3.4.3 All of the SEA indicators have been incorporated into the SA objectives.

3.4.4 Indicators and targets for each of the SA objectives have then been developed with regard to the updated baseline.



## IV. Sustainability Appraisal Methodology

- 4.1 Guidance for developing the SA methodology is available from:-
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005;
  - A Practical Guide to the SEA Directive, ODPM, Scottish Executive, Welsh Assessment Government and Northern Ireland Department of the Environment, September 2005;
  - Welsh Government, Local Development Plan Manual (Edition 2, 2015);
  - Improving the Effectiveness and Efficiency of SEA/SA for Land Use Plans, Royal Town Planning Institute, 2018.
- 4.2 This available guidance has been utilised to develop the SA framework and the appraisal methodology.

### IV.1 Sustainability Appraisal Framework and Monitoring Framework

- 4.1.1 A consistent method is required for comparing and contrasting, analysing and describing, the impacts of the SA objectives against Replacement LDP options, policies, proposals and objectives. This method is achieved by utilising an objective-led SA framework.
- 4.1.2 Table 20 below sets out the SA Framework; the SA objectives and the decision making influences that will be considered in respect of the Replacement LDP (RLDP).

*Table 20: SA Framework*

SA Objectives	Decision Making Influences
<b>SA 1:</b> Everyone lives in homes that meet their needs.	Will the RLDP make sufficient provision for additional housing required by residents of Denbighshire?  Will the RLDP increase the provision of affordable housing?

	<p>Will the RLDP contribute to creating homes that are healthier?</p>
<p><b>SA 2:</b> Communities are healthier.</p>	<p>Will there be a positive or negative impact on human health?</p> <p>Will the RLDP allow people to utilise open space?</p> <p>Will the RLDP situate development where it is sustainable and there is access to services?</p> <p>Will the RLDP have a positive or negative impact on the existing air quality baseline?</p> <p>Will the RLDP contribute to social inclusion?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP encourage the expansion of high quality, sustainable settlements?</p>
<p><b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.</p>	<p>Will the RLDP allow people to make more sustainable transport choices?</p> <p>Will the RLDP protect and/or create green or blue infrastructure?</p> <p>Will the RLDP create, enhance, recover or mitigate the loss of open space?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP positively or negatively impact on coastal and inland water quality?</p>
<p><b>SA 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.</p>	<p>Will the RLDP allow people to make more sustainable transport choices?</p> <p>Will the RLDP increase or decrease the emissions of air pollutants from transport?</p> <p>Will the RLDP increase opportunities for walking and cycling?</p> <p>Will the RLDP protect and/or create green or blue infrastructure?</p>
<p><b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.</p>	<p>Will the RLDP encourage the growth of the Welsh language?</p>

<p><b>SA 6:</b> There is a strong local economy and successful regeneration.</p>	<p>Will the RLDP encourage needs to be met locally?</p> <p>Will the RLDP encourage the retention of young people?</p> <p>Will there be any adverse economic impacts on employment premises or land?</p> <p>Will the RLDP positively or negatively impact on job opportunities?</p> <p>Will the RLDP positively or negatively impact on the use of brownfield land?</p> <p>Will the RLDP positively or negatively impact on current redundant, vacant or derelict buildings?</p> <p>Will the RLDP increase or reduce the amount of redundant, vacant or derelict buildings?</p>
<p><b>SA 7:</b> Denbighshire's town and rural centres are not in decline.</p>	<p>Will the RLDP positively or negatively impact on job opportunities?</p> <p>Will there be any adverse economic impacts on employment premises or land?</p> <p>Will the RLDP positively or negatively impact on main and local centres?</p> <p>Will the RLDP positively or negatively impact on rural or village services?</p>
<p><b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.</p>	<p>Will the RLDP contribute to reducing resource consumption?</p> <p>Will the RLDP increase or decrease land contamination?</p> <p>Will the RLDP improve or degrade soil quality?</p> <p>Will the RLDP positively or negatively impact high quality agricultural land?</p> <p>Will the RLDP positively or negatively impact areas of peat?</p> <p>Will the RLDP positively or negatively impact on mineral reserves?</p>
<p><b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.</p>	<p>Are there any designated or non-statutory habitats or species that may be affected by the RLDP?</p> <p>Are there opportunities to create, enhance, recover or mitigate the loss of species or habitat?</p> <p>Are there opportunities to create, enhance or mitigate the loss of open space and green or blue infrastructure?</p>

	<p>Will there be a positive or negative impact on human health?</p> <p>Will the RLDP improve or degrade soil quality?</p> <p>Will the RLDP positively or negatively impact on air quality?</p> <p>Will the RLDP positively or negatively impact on water quality?</p>
<p><b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.</p>	<p>Are there any designated or non-statutory natural landscapes that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory historic landscapes that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory cultural landscape or environment that may be affected by the RLDP?</p>
<p><b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.</p>	<p>Are there any designated or non-statutory historic sites or buildings that may be affected by the RLDP?</p> <p>Are there any designated or non-statutory cultural sites, features or buildings that may be affected by the RLDP?</p>
<p><b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.</p>	<p>Will the RLDP have a positive or negative impact on CO<sub>2</sub> emissions?</p> <p>Will the RLDP encourage the use of renewable energy?</p> <p>Will the RLDP increase the number of properties at risk of flooding?</p> <p>Will the RLDP contribute to a reduction in flood risk?</p> <p>Will the RLDP contribute to social inclusion?</p> <p>Will the RLDP contribute to improved water management?</p> <p>Will the RLDP increase or minimise soil erosion?</p>

4.1.3 The SA Framework includes consideration of potential cumulative effects which are set out in Appendix B together with how the Replacement LDP can be monitored in terms of sustainability. Trends that the SA objectives seek to achieve have been built upon to develop draft monitoring targets and indicators as can be seen in Table 21 set out below. This has enabled the SA Framework to be reviewed to ensure that it is considering predictive effects and evaluating the effects which is explained in more detail in Section IV.II below.

Table 21: SA Draft Monitoring Framework

Objective	Target	Indicator	Source
<b>SA 1:</b> Everyone lives in homes that meet their needs.	Reduce the multiplier of property prices compared to income.	Average property price compared against the average earnings.	Land Registry; LHMA.
	Increase the number of flats, terraced and semi-detached properties built.	Range of new properties built annually.	LHMA
	Ensure there is an ongoing supply of affordable homes.	Number of :- Market dwellings per annum (pa); Intermediate dwellings pa; Social / affordable dwellings constructed pa.	LHMA
	Reduce mismatch between social housing demand and supply.	An increasing supply of social housing.	LHMA
<b>SA 2:</b> Communities are healthier.	Increase life expectancy base date: 2015-2017.	Life expectancy at birth for males and females.	WG / ONS as updated
	Reduction in mortality figures in the age groups 55 to 74. Base date 2017.	Mortality figures.	WG / ONS as updated
	Maintain & increase number of memberships, base date 01 April 2018.	Number of people using DCC leisure facilities.	DCC
	There is no loss in the net availability of open space per 1000 population from 2018 baseline.	Open space provision in Denbighshire.	DCC – open space assessment / contributions
	Increase the active travel network.	Active travel network provision.	DCC
<b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.	There is no loss in the net availability of open space per 1000 population from 2018 baseline.	Open space provision in Denbighshire.	DCC – open space assessment / contributions
	All new open space is of high quality as per the standards set out in 2017 SPG.	Creation of new open space.	DCC – planning applications / review open space assessment
	Increase the active travel network.	Active travel network provision i.e. in terms of length.	DCC

	Maintain good water quality of inland and coastal waters.	Good bathing water quality.	DCC
<b>SA 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.	No major development of 10 or more units is located so that there is no access a bus stop.	Number of major developments without access to a bus stop.	DCC
	Safe access by all users including cyclists, pedestrians to public services, retail and community facilities.	Number of developments that incorporate public service facilities such as providing parking for bikes, cycles and are accessible by public transport.	DCC
	Increase the active travel network.	Active travel network provision.	DCC
<b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.	Maintain and improve the proportion of Welsh speakers.	Number of Welsh speakers in the County.	Census WG
	Maintain and increase the number of pupils educated through the medium of Welsh.	Number of pupils educated through the medium of Welsh.	DCC
<b>SA 6:</b> There is a strong local economy and successful regeneration.	Increase GVA per head on an annual basis. Base year 2017.	GVA per head.	Regional Accounts, ONS.
	To increase the number of VAT registered enterprises on an annual basis. Base year 2017.	Number of VAT registered enterprises.	Business Demography, ONS
	To decrease the number of people claiming unemployment benefits. Base year 2016.	Number of unemployed people claiming benefits.	DWP
	No contamination of soil.	Area of contaminated land.	DCC
<b>SA 7:</b> Denbighshire's town and rural centres are not in decline.	Increase the annual footfall in Denbighshire town centres.	Footfall figures for Denbighshire town centres.	DCC
	Decrease the amount of vacant units in Denbighshire town centres.	Vacancy rates in Denbighshire town centres.	DCC
	No rural / village services or facilities are lost	Number of rural / village services or facilities lost	DCC

	through change of use.	through change of use contrary to policy.	
<b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.	No loss of Grade 1 or 2 agricultural land to development.	Number of permitted applications on high quality agricultural land.	DCC
	No contamination of soil.	Area of contaminated land.	DCC
	An increasing use of permeable surfaces in new developments that minimise soil erosion and improve water management.	% of permitted new developments that incorporate permeable surfaces as a SUDS technique.	DCC
	Remediate all contaminated land to a satisfactory standard when required by new development.	Amount of contaminated land remediated.	DCC
	To sustainably manage existing mineral reserves.	Mineral reserves.	DCC
	Protect peat resources. Base line 2018.	Amount of available peat.	DCC
<b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.	Maintain good water quality of inland and coastal waters.	Good biological, chemical and bathing water quality.	DCC
	No annual mean increase in NO <sub>2</sub> from 2016 base year.	Air quality mean concentrations for NO <sub>2</sub> in Denbigh, Ruthin and St Asaph	DCC
	Improve green and blue infrastructure that is suitable as habitats and active travel routes.	Number of habitats created and maintained in urban and rural areas.	DCC
	No applications are granted which have an irreversible adverse effect on designated habitats and/or species.	Number of granted planning applications which have an irreversible adverse effect on designated habitats and/or species.	DCC
	There is no loss in the net availability of open space per 1000 population from 2018 baseline.	Open space provision in Denbighshire.	DCC – open space assessment / contributions
	No contamination of soil.	Area of contaminated land.	DCC

<b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.	No net loss in statutory, regionally important or local designations.	Number of statutory, local, regionally important designations including RIGS.	DCC
	No loss or adverse effect from new development to designated sites.	Number and distribution of Scheduled Monuments, Conservation Areas, Historic landscapes and Registered Parks and Gardens.	DCC
	No development adversely impacting upon the natural or historic landscape setting.	Number of permitted developments adversely impacting upon the AONB or historical landscapes.	DCC, CADW, NRW
<b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.	No loss or damage from new development to designated sites and buildings.	Number and distribution of Listed Buildings and Scheduled Monuments.	DCC
	No development adversely impacting upon historic or cultural buildings or their settings.	Number of permitted developments adversely impacting upon cultural or historic buildings and their settings.	DCC
<b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.	Renewable energy is in local ownership / communities are receiving income from renewables.	Renewable energy community scheme payments	
	No decrease in renewable energy capacity.	% of energy capacity from renewable sources.	DCC
	No new development sited in floodplain areas contrary to the advice of NRW.	Number of new vulnerable developments granted planning permission in C1 and/or C2 floodplain area contrary to advice from NRW.	DCC
	To ensure new development does not increase the risk of flooding.	% of new developments with Sustainable Drainage Systems incorporated, or similar solution where suitable.	DCC
	An increasing use of permeable surfaces in new developments that	% of permitted new developments that incorporate permeable	DCC



	minimise soil erosion and improve water management.	surfaces as a SUDS technique.	
	Increasing trend of low carbon / renewable energy technology being incorporated into new developments.	Number of new developments which as part of the planning application design in low carbon or renewable energy technology into the scheme / units such as a centralised heating scheme.	DCC

#### IV.11 Criteria for assessing the impact of effects

4.2.1 The methodology that has been adopted for this assessment is strategic and qualitative which is generally accepted as good practice by the SA guidance.

4.2.2 The assessment of the Replacement LDP, in accordance with Stage B of the SA / SEA process, was broken down into ‘prediction’ of effects, ‘evaluation’ of effects and ‘mitigation’ of effects which were then formulated into an assessment matrix.

##### **Prediction of effects**

4.2.3 The prediction of effects involved the identification of the potential changes to the sustainability baseline conditions, which were considered to arise from the specific policy being implemented by the Replacement LDP. The predicted effects were then considered in terms of their nature and magnitude using the following parameters:

- Geographical Scale;
- Probability of the effect occurring;
- Timing of effect – short (0 to 5 years), medium (6 to 10 years), long term (11 to 20 years);
- Duration of effect – temporary or permanent;
- Nature of effect – positive, negative or neutral;
- Secondary, cumulative and/or synergistic effects (Appendix B).

4.2.4 The prediction of effects was undertaken for each growth and spatial option as well as in respect of key policies. The prediction of effects has been incorporated into the SA Framework above and is expressed by way of the SA assessment matrix set out below.

#### **Evaluation of effects**

4.2.5 The evaluation involved forming a judgement on whether or not the predicted effects would be environmentally significant. As with the prediction of the effects, the criteria of assessing the significance of a specific effect used in this assessment, as outlined in Annex II of the SEA Directive, has been based on the following parameters to determine the significance:

- Scale;
- Permanence;
- Nature and sensitivity;
- Cumulative effects (Appendix B).

4.2.6 Cumulative and/or secondary effects have also been considered when assessing the draft Preferred Strategy options as required by Annex I of the SEA Directive.

#### **Mitigating effects**

4.2.7 Mitigation measures have been identified during the evaluation process to reduce the scale/importance of significant negative effects and also maximise beneficial effects.

#### **SA Assessment Matrix**

4.2.8 In the current practice of sustainability appraisals, the strategic qualitative prediction and evaluation of effects is based on a qualitative seven point scale in easily understood terms. In general, this assessment has adopted the scale set in Table 22 to assess the significance of effects of the Replacement LDP strategic options and policies.

Table 22: SA Assessment Matrix

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

#### IV.III Monitoring

4.3.1 SA monitoring involves measuring indicators. The indicators create a causal link between the Plan, its objective or ambition and how it is implemented in practice, throughout its lifetime. They enable the likely effect (positive or negative, significant or not) to be monitored. It thus helps to ensure that any adverse effects, which arise during implementation, whether or not they were foreseen, can be identified and that appropriate remedial or mitigating action can be taken.

4.3.2 The draft monitoring framework has been provided above at Table 21, as it was developed in conjunction with the SA framework to ensure that both complemented each other and reduced unforeseen affects. The draft monitoring framework will be reviewed as the Replacement LDP progresses and will be finalised at SA / SEA stage D when the final SA report is prepared.

## V. Assessment of the Replacement LDP Vision

- 5.1 The Replacement LDP Vision has been assessed against the SA Objectives to ensure that it does not conflict with sustainability principles, see Table 23 below.
- 5.2 The role of the LDP Vision is to define the principle objectives of the Replacement LDP and provide a framework for the Draft Preferred Strategy and future detailed policies. The Vision distils the main priorities and drivers for Denbighshire and draws on priorities set by national policy and relevant local strategies.
- 5.3 The draft Replacement LDP Vision has been subject to stakeholder engagement:

*Denbighshire, through sustainable development, will have a vibrant urban coast, with thriving market towns and rural areas. The housing and employment needs of the County will be met and the high quality environment will be enhanced and protected. Life of a high quality will be maintained for all communities; with full recognition that we have a strong Welsh language and culture that should be supported and enhanced throughout the County.*

- 5.4 The Vision overall positively assists in delivering the SA Objectives, although the responsible use of finite resources (SA 8), is not explicitly referred to. This will however be reflected when drafting the RLDP Objectives and Policies.

Table 23: Replacement Local Development Plan Vision compared with SA Objectives

SA Objectives		RLDP Vision
<b>SA 1:</b> Everyone lives in homes that meet their needs.	+	<i>The housing and employment needs of the County will be met.</i>
<b>SA 2:</b> Communities are healthier.	+	<i>Life of a high quality will be maintained for all communities</i>
<b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.	+	<i>Life of a high quality will be maintained for all communities. The high quality environment will be enhanced and protected.</i>

<b>SA 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.	+	<i>Life of a high quality will be maintained for all communities. The housing and employment needs of the County will be met.</i>
<b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.	+	<i>We have a strong Welsh language</i>
<b>SA 6:</b> There is a strong local economy and successful regeneration.	+	<i>Will have a vibrant urban coast, with thriving market towns and rural areas. The housing and employment needs of the County will be met.</i>
<b>SA 7:</b> Denbighshire's town and rural centres are not in decline.	+	<i>Will have a vibrant urban coast, with thriving market towns and rural areas.</i>
<b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.	?	Unknown and will depend on RLDP objectives and policies.
<b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.	+	<i>The high quality environment will be enhanced and protected.</i>
<b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.	+	<i>The high quality environment will be enhanced and protected. We have a strong Welsh language and culture.</i>
<b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.	+	<i>The high quality environment will be enhanced and protected. We have a strong Welsh language and culture.</i>
<b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.	+	<i>Life of a high quality will be maintained for all communities. The high quality environment will be enhanced and protected.</i>

## VI. Assessment of the Replacement LDP Objectives

- 6.1 Strategic Objectives have been developed which translate the vision into a framework which sets out how the Replacement LDP Vision will be delivered and what the Plan is trying to achieve. The Replacement LDP (RLDP) Objectives have been assessed against the SA framework and displayed utilising the SA assessment matrix. The findings can be seen in Table 24 and 25 below.
- 6.2 One of the most challenging assessments is that of potential impacts on use of the Welsh language. It is difficult to influence directly through land use planning as there is no control over the occupation of market housing.
- 6.3 Overall the RLDP Objectives help in achieving sustainability although they will be dependent on implementation and policy as to how they are delivered. The assessment against the SA framework is provided under the heading commentary in Table 24 below.

*Table 24: Replacement Local Development Plan Objectives compared to SA Objectives.*

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

		<ul style="list-style-type: none"> <li>• This supports the locality, assists in creating a sense of place, appropriate housing and job opportunities for local people (SA 1, 3, 4, 6, 7 and 12).</li> <li>• There is no link to finite resources (SA 8) or the environment (SA 9).</li> </ul>
RLDP 3	Protecting, enhancing and sustainably developing Denbighshire's natural resources including green and blue infrastructure, renewable energy and mineral resources.	<ul style="list-style-type: none"> <li>• Significantly supports having high quality green and blue infrastructure (SA 3), providing opportunities for active travel (SA 4), retaining peat, minerals, soil (SA 8), creating a diverse environment (SA 9) and reducing the impact of CO<sub>2</sub> emissions and climate change (SA 12).</li> <li>• Helps in achieving healthier homes (SA 1), healthier and resilient communities with opportunities for walking and cycling (SA 2). It helps in creating job opportunities in the energy sector (SA 6) and improving rural access to services (SA 7).</li> <li>• It will be dependent on implementation as to how it impacts the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> <li>• There is no link to Welsh speakers (SA 5).</li> </ul>
RLDP 4	Protecting and enhancing Denbighshire's natural, built and historic environment.	<ul style="list-style-type: none"> <li>• Significantly supports a diverse environment (SA 9), the landscape (SA 10) the culturally important and historic built environment (SA 11).</li> <li>• It helps in achieving healthier communities (SA 2), high quality green and blue infrastructure (SA 3), reduced land contamination and responsible use of finite resources (SA 8).</li> <li>• It will be dependent on implementation as to how it impacts on delivering homes (SA 1), local community services (SA 4), the local economy (SA 6), town and rural centres and the resilience to climate change.</li> <li>• There is no link to Welsh speakers (SA 5).</li> </ul>
RLDP 5	Supporting the provision, operation and development of infrastructure and services.	<ul style="list-style-type: none"> <li>• Significantly helps in delivering well serviced communities (SA 4), a strong local economy (SA 6), town and rural centres (SA 7)</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2).</li> <li>• Implementation will determine whether it delivers high quality green and blue infrastructure (SA 3), services that contribute to increasing the number of Welsh speakers (SA 5) or reduces the risks of climate change (SA 12). Implementation will control how finite resources are utilised (SA 8), whether there is a positive or negative impact on the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> <li>• <i>Suggest inserting the word 'sustainable' before development so that the implementation is undertaken in a positive manner.</i></li> </ul>
RLDP 6	Supporting a healthy economy including proposals for strategic growth, key economic sectors	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Helps in achieving homes that meet everyone's needs (SA 1), healthier communities (SA 2), serviced communities (SA 4)</li> </ul>



	and the rural economy.	<ul style="list-style-type: none"> <li>• Implementation will determine whether it delivers high quality green and blue infrastructure (SA 3) the impact on finite resources (SA 8), the environment (SA 9) and landscape (SA 10), the culturally important and historic built environment (SA 11) and climate change (SA 12).</li> <li>• It could help retain Welsh speakers by providing quality jobs locally to where they grew up (SA 5).</li> </ul>
RLDP 7	Enabling the regeneration and renewal of Denbighshire's built environment and public realm to contribute to vital, viable and attractive town centres with employment premises that meet the requirements of modern businesses.	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and successful regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Renewing the built environment and having designated employment premises helps deliver homes by ensuring that residential premises are not converted into employment premises (SA 1). Helps create opportunities for social inclusion and healthier communities (SA 2) where Welsh speakers will be retained and want to work (SA 5).</li> <li>• Implementation will determine the impact on high quality green and blue infrastructure (SA 3), transport services (SA 4) and finite resources (SA 8), the environment (SA 9), the landscape (SA 10), historic and cultural features (SA 11) and resilience to climate change (SA 12).</li> </ul>
RLDP 8	Supporting development that promotes well-being, community cohesion and resilience including measures to address the effects of flood risk and climate change.	<ul style="list-style-type: none"> <li>• Significantly supports human health, social inclusion, healthier communities (SA 2) and communities that are resilient to climate change (SA 12).</li> <li>• Helps deliver houses for everyone (SA 1), green and blue infrastructure and open space (SA 3), well served communities (SA 4) and cohesive communities that contribute to increasing the number of Welsh speakers (SA 5) by being places where Welsh speakers want to live and improving town and rural centres (SA 7) as well as retaining culturally important and historic features (SA 11).</li> <li>• Implementation will determine the impact on the local economy and regeneration (SA 6), finite resources (SA 8), the environment (SA 9) and landscape (SA 10).</li> </ul>

6.4 The assessment of the RLDP objectives in terms of the SA assessment matrix can be seen in Table 25 below.

Table 25: SA Assessment Matrix of Replacement Local Development Plan Objectives

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

## VII. Assessment of the Replacement LDP Growth Options

7.1 There are five projected growth options that have been considered for the Replacement LDP which are:-

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

7.2 In order to sustainably assess the Replacement LDP growth options it is advisable to consider the figures of the adopted LDP and the current trends as a baseline. It is important to note:-

- Denbighshire has an aging population.
- There is a high dependency ratio of 722 dependents for every 1,000 working age people; expressed as 0.722.
- The adopted LDP provided for 7500 new dwellings over the plan period (15 years), 500 new dwellings per annum and 59.50 hectares of employment land. It provided for a 10% affordable housing contribution, 50 affordable homes per annum.

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

7.3 In order to facilitate the SA assessment of the growth options, Table 26 below sets out the options and information from the Growth Level Options Report 2019. It also includes some additional baseline information explained above to provide a clearer indication of the impacts of each option.

Table 26: Growth Options Information Table incorporating Growth Level Options Report 2019

Impact indicator Projections	Totals 2018	Potential change/impact 2018-2033				
		Option 1	Option 2	Option 3	Option 4	Option 5
<b>Population</b>	95,500	3,700	4,650	7,500	5,500	13,100
<i>Population % increase on 2018</i>		+3.9%	+4.9%	+7.9%	+5.8%	+13.7%
<b>Households</b>	41,700	2,050	2,500	3,750	3,000	6,150
<i>Households % increase on 2018</i>		+4.9%	+6.0%	+9.0%	+7.2%	+14.7%
<b>Total dwelling requirement</b>	-	2,450	3,000	4,550	3,600	7,500
<b>Annual dwelling requirement</b>	-	160	200	300	240	500
<i>LHMA 15 year annual dwelling trend comparison</i>	220	-60	-20	+80	+20	+280
<b>Current trend (CT)- Comparison with 5 year annual average trend</b>	162	-2	+38	+138	+78	+338
<b>Affordable housing provision potential (AHPP) per year (10% of total requirement)</b>	-	15-20	20-25	30-35	20-25	45-50
<i>Comparison with 5 year annual average trend (34.5% of CT) and highest AHPP</i>	56	-36	-31	-21	-31	-6
<b>20% annual affordable housing provision (AHP)</b>	-	32	40	60	48	100
<i>20% AHP comparison with 5 year annual average trend</i>	56	-24	-16	+4	-8	+44
<b>Working age population*</b>	55,200	1,050	1,550	3,300	1,800	7,650
<i>Working age population % increase on 2018</i>		+1.9%	+3.7%	+7.9%	+4.3%	+18.3%
<b>Labour force (working age pop. who are econ. active)</b>	41,750	650	1,000	2,300	1,200	5,600
<i>Labour force % increase on 2018</i>		+1.6%	+2.4%	+5.5%	+2.9%	+13.4%
<b>Jobs growth</b>	45,000	750	1,200	2,750	1,300	6,800
<b>Income in local economy</b>	-	Increase	Increase	Increase	Increase	Increase
<b>Business impact</b>	-	Positive	Positive	Positive	Positive	Positive
<b>Employment land requirement for jobs growth (ha)**</b>	-	5.2 ha	8.3 ha	19.2 ha	9.0 ha	47.6 ha
<i>Comparison with ELEGA 2019 and employment land projection</i>	47.6 ha	-42.4 ha	-39.3 ha	-28.4 ha	-38.6 ha	0. Matched

<b>Dependency ratio (DR) ***</b>	-	0.763	0.765	0.759	0.772	0.726
<i>2017 Dependency ratio (0.722) compared with projected DR</i>	0.722	+0.041	+0.043	+0.037	+0.050	+0.004
<p>* Changes in state pension age are taken into account when calculating the working age population. At the end of the 2018-33 projection periods that age is 67 for men and women, so working age is all residents aged 16-66. In 2018 the working age population are in the age range 16-64 as state retirement age is 65 for men and women.</p> <p>** Additional employment land may be needed for replacement or expansion of existing sites.</p> <p>*** Dependency ratio - number of people within the population who are not of working age for each 1,000 people of working age.</p>						

7.4 Considering the SA objectives commentary on the sustainability of the growth options is provided in Table 27 below.

Table 27: Replacement LDP Growth Options compared to SA Objectives.

<b>Growth Option</b>	<b>Commentary</b>
1 – population led, 15 year trend (WG)	<ul style="list-style-type: none"> <li>•Significantly hinders delivery of homes for everyone (SA 1) as it is below the current 5 year trend, the 15 year trend and would not deliver sufficient affordable housing in line with the current trend when a 10% or 20% provision is utilised.</li> <li>•Significantly hinders a strong local economy (SA 6) as it fails to address the imbalance of the aging population and create sufficient job opportunities to retain younger people.</li> <li>•Hinders healthier communities (SA 2) as it fails to create healthier, suitable homes that are affordable for residents and does not encourage the expansion of high quality sustainable settlements.</li> <li>•Hinders town and rural centres (SA 7) as it doesn't limit decline as job opportunities are limited and there is insufficient employment land to encourage investment.</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the historic and cultural features (SA 11) and resilience to climate change (SA 12).</li> <li>•There is no clear trend as to how development impacts on the Welsh language (SA 5).</li> <li>•Helps in maintaining the current infrastructure that is in place as the increase in population, dwellings and employment land is not significant, it will contribute to delivering good infrastructure, air quality (SA 4), renewable energy and minimising climate change (SA 12) as long as implementation is in sustainable locations as in the current, adopted LDP.</li> </ul>
2 – population led, 10 year trend (WG)	<ul style="list-style-type: none"> <li>•Hinders the delivery of homes for everyone (SA 1) as it does not deliver on the 15 year LHMA annual dwelling trend and is below the current trend for affordable housing when a 10% or 20% provision is utilised. Hinders healthier communities (SA 2) as it fails to create healthier, suitable homes that are affordable for residents and does not encourage the expansion of high quality sustainable settlements.</li> </ul>

	<ul style="list-style-type: none"> <li>•Helps in maintaining the current infrastructure that is in place as the increase in population, dwellings and employment land is not significant, it will contribute to delivering good infrastructure, air quality (SA 4), renewable energy and minimising climate change (SA 12) as long as implementation is in sustainable locations as in the current, adopted LDP.</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), and the historic and cultural features (SA 11).</li> <li>•There is no clear trend as to how development impacts on the Welsh language (SA 5).</li> <li>•Helps and hinders in delivering a strong local economy (SA 6) and ensuring town and rural centres are not in decline (SA 7) as it moderately increases the working age population and makes some provision for employment land although they are unlikely to be able to fill the gap of 16 to 29 year olds and encourage significant regeneration.</li> </ul>
<p>3 – population led, 15 year trend (propensity method)</p>	<ul style="list-style-type: none"> <li>•Significantly helps in delivering homes that meet everyone’s needs (SA 1) in that it delivers 80 more homes than the 15 year annual trend and aligns with the current affordable homes trend when a 20% provision is utilised. This will have a positive impact on human health, allowing for suitable homes that are affordable and encouraging the expansion of high quality settlements and contribute to social inclusion (SA 2).</li> <li>•Helps in delivering a strong local economy (SA 6) as it increases the labour force, working age population and allows for some employment land which will also assist in ensuring town and rural centres are regenerated (SA 7).</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3) finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the historic and cultural features (SA 11) and resilience to climate change (SA 12).</li> <li>•Positively and negatively impacts on the servicing of communities as dwelling development should encourage the growth of infrastructure and services although the increase in population could negatively impact on climate change such as encouraging car use that could increase air pollution (SA 4 &amp; SA 12).</li> <li>•There is no clear trend as to how development impacts on the Welsh language (SA 5).</li> </ul>
<p>4 – Employment, labour demand led trend.</p>	<ul style="list-style-type: none"> <li>•Hinders the delivery of homes for everyone (SA 1) as it does not deliver on the 15 year LHMA annual dwelling trend and is just below the current affordable housing trend when a 20% provision is utilised. Hinders healthier communities (SA 2) as it fails to create healthier, suitable homes that are affordable for residents and does not encourage the expansion of high quality sustainable settlements.</li> <li>•Helps and hinders in delivering a strong local economy (SA 6) and ensuring town and rural centres are not in decline (SA 7) as it moderately increases the working age population and makes some provision for employment land although they are unlikely to be able to fill the gap of 16 to 29 year olds and encourage significant regeneration.</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3), finite resources (SA 8), the environment (SA 9), the</li> </ul>

	<p>landscape (SA 10), the historic and cultural features (SA 11) and resilience to climate change (SA 12).</p> <ul style="list-style-type: none"> <li>•There is no clear trend as to how development impacts on the Welsh language (SA 5).</li> <li>•Helps in maintaining the current infrastructure that is in place as the increase in population, dwellings and employment land is not significant, it will contribute to delivering good infrastructure, air quality (SA 4), renewable energy and minimising climate change (SA 12) as long as implementation is in sustainable locations as in the current, adopted LDP.</li> </ul>
<p>5 – Employment, land take up trend.</p>	<ul style="list-style-type: none"> <li>•Significantly helps in delivering homes that meet everyone’s needs (SA 1) in that it only just under delivers on the current affordable homes trend when a 10% provision is applied, exceeds it when a 20% provision is applied and delivers 338 more homes than the 15 year annual trend. This will have a positive and negative impact on human health, allowing for suitable homes that are affordable and encouraging the expansion of high quality settlements although it will negatively impact air quality and access to services with the increase in population and car numbers and it could contribute to social inclusion or isolation (SA 2).</li> <li>•Significantly helps in delivering a strong local economy (SA 6) as it significantly increases the labour force, working age population and allows for sufficient employment land in line with the ELEGA. It also only marginally increases the dependency ratio of 2018 and starts to change the trend of net out-migration of 16 to 29 year olds. It also helps in ensuring town and rural centres are regenerated (SA 7).</li> <li>•Implementation will determine the impact on high quality green and blue infrastructure (SA 3), finite resources (SA 8), and the historic and cultural features (SA 11).</li> <li>•There is no clear trend as to how development impacts on the Welsh language (SA 5).</li> <li>•The population increase and the number of houses anticipated are such that they will put increasing pressure on development of high quality agricultural land, flood zone areas, natural beauty spots and habitats. This will hinder the creation of a diverse environment (SA 9), the landscape (SA 10) as well as ensuing communities are resilient to climate change (SA 12). This will also have a negative impact on air quality with an increased number of car users and pressure on the transport infrastructure. It will significantly hinder delivering well served communities (SA 4).</li> </ul>

7.5 The assessment of the RLDP growth options in terms of the SA assessment matrix can be seen in Table 28 below.



Table 28: SA Assessment Matrix of the Replacement LDP Growth Options

Growth Option	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
1	--	-	#	+	+/-	--	-	#	#	#	#	+
2	-	-	#	+	+/-	+/-	+/-	#	#	#	#	+
3	++	+	#	+/-	+/-	+	+	#	#	#	#	+/-
4	-	-	#	+	+/-	+/-	+/-	#	#	#	#	+
5	++	+/-	#	--	+/-	++	+	#	-	-	#	-

7.6 Overall growth **option 3** would have the most positive effect although it could have negative impact on communities' resilience to climate change and blue and green infrastructure. The most sustainable option in terms of housing provision would be one somewhere between **option 3** and **option 2 or 4**. There is a need, however, for a substantial amount of affordable housing and employment land. The increase in population however should be more limited so that transport infrastructure and services are not overstretched. Ideally the provision of employment land would be matched as stated in **option 5** and the ELEGA to limit net out-migration of 16 to 29 year olds and the dependency ratio.

7.7 A combined growth option is ideally required to ensure sustainability.

## VIII. Assessment of the Replacement LDP Spatial Options

- 8.1 An assessment of the settlements in the adopted LDP has been undertaken in order to establish an appropriate settlement hierarchy which could inform strategic spatial options for the Replacement LDP. The settlement hierarchy can be found in this report at Appendix C.
- 8.2 There are four potential spatial options that have been considered for the Replacement LDP which are:-
- **Option 1: Serviced settlements only**
- 8.2.1 This would spread growth across the County's main or local centres and serviced villages. Villages without services or facilities would be allowed some limited growth but would not have land-use allocations. The levels of growth in each settlement would reflect its position in the settlement hierarchy (Appendix C), with some flexibility to reflect local circumstances.
- All serviced settlements would have incremental growth which may not be realistic due to physical constraints or availability of land.
  - The levels of growth may not be high enough to deliver additional infrastructure benefits.
  - It would assist in securing the future of facilities and services within settlements.
- **Option 2: Strategic site and serviced settlements**
- 8.2.2 This option focuses growth in a single major mixed-use site in Bodelwyddan (for which outline permission was granted in 2016), with lower levels of growth in the main or local centres and serviced villages. Villages without services or facilities would be allowed some limited growth. The levels of growth in each settlement would reflect its position in the settlement hierarchy (Appendix C), with some flexibility to reflect local circumstances.
- Bodelwyddan is in the north of the County where the majority of the population resides, where the key transport links exist and where infrastructure can facilitate growth.

- Growth is directed to a single, major, mixed-use site that can facilitate sustainable development.
- Lower levels of growth elsewhere in the County would have flexibility to recognise constraints and aspirations.
- It may restrict the opportunities for higher growth elsewhere in the County.
- Delivery of a single major site is likely to extend beyond the plan period.
- Significant infrastructure is required to enable development of the strategic site.

➤ **Option 3: Strategic site and all settlements.**

8.2.3 This option focuses growth in a single major mixed-use site in Bodelwyddan (for which outline permission was granted in 2016), with lower levels of growth in the main or local centres, villages and unserviced villages. It allows growth in the smaller, rural settlements in accordance with the settlement's position in the hierarchy (Appendix C).

- Bodelwyddan is in the north of the County where the majority of the population resides, where the key transport links exist and where infrastructure can facilitate growth.
- Growth is directed to a single, major, mixed-use site that has the potential to facilitate sustainable development.
- Lower levels of growth elsewhere in the County would have flexibility to recognise constraints and aspirations.
- Allows unsustainable patterns of development.
- Increases reliance on car travel for services and everyday needs.
- It may restrict the opportunities for higher growth elsewhere in the County.
- Delivery of a single major site is likely to extend beyond the plan period.
- Significant infrastructure is required to enable development of the strategic site.

➤ **Option 4: All settlements**

8.2.4 This option was put forward by attendees as part of the consultation with city, town and community councillors. This option is based on Option 1 plus development in those settlements without facilities or services. This would spread growth across all of the County's settlements. The levels of growth in each settlement would reflect its position in the settlement hierarchy (Appendix C), with some flexibility to reflect local circumstances.

- All settlements would have incremental growth which may not be realistic due to physical constraints or availability of land.
- The levels of growth may not be high enough to deliver additional infrastructure benefits.
- Allows unsustainable patterns of development.
- Increases reliance on car travel for services and everyday needs.

8.3 In order to sustainably assess the Replacement LDP spatial options it is advisable to consider the position of the adopted LDP and the current trends as a baseline. It is important to note:-

The adopted LDP:-

- Focused development into a small number of large sites in the north of the County;
- Utilised a settlement hierarchy to allow small scale new development in other settlements;
- Considered that it was beneficial to have large mixed use developments;
- Noted 64% of proposed new development in County was located in the north which had the greatest level of housing need and strongest housing market;
- Noted main public transport nodes were located in the north of the County -along the A55 corridor;
- Noted constraints on development were more significant in the south of the County due to topography;

- Considered that there was a need to protect and enhance natural and built heritage.

8.4 The baseline evidence set out above recognises that:-

- There are significant levels of deprivation in parts of Rhyl;
- Rural areas have more limited access to services;
- Rural areas generally, particularly in the South of the County, have a higher Welsh language sensitivity;
- The transport network is more extensive in the north of the County;
- Pressure on the environment and landscape from the limited ability to expand some settlements;
- Extensive areas in Rhyl and Prestatyn are at risk from flooding.
- 29% of Bodelwyddan's population had some Welsh skills in 2011. This is higher than the Denbighshire average. It is lower than other towns such as Corwen which has 62%, Denbigh which has 54% and Ruthin which has 57% of their populations having one or more skills in Welsh. A Welsh language impact assessment was undertaken on Bodelwyddan as a key strategic site in the adopted LDP and for example found that:-
  - Welsh language education is pivotal to ensure Welsh becomes part of a new community as it grows.
  - There is an opportunity for the development to make a positive contribution to the Welsh language.
  - Mitigation measures should be implemented including:-
    - Using a Welsh brand name and Welsh street names;
    - Promoting Welsh education among children and adults;
    - Partnership working with Mentrau Iaith to establish new social events through the medium of Welsh in Bodelwyddan and the surrounding communities.

8.5 The assessment of the spatial options is set out in Table 29 below:-

Table 29: SA Assessment Matrix and commentary on Replacement LDP Spatial Options

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Spatial Option 1: Serviced Settlements</b>	Short 0 – 5 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Medium 6 – 10 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Long 11 – 20 years	+	+	+	+	+ / -	+ / -	+ / -	#	+ / -	+	#	+ / -
<b>Commentary</b>	Distributing incremental growth to serviced settlements in accordance with the settlement hierarchy would generally be sustainable and have positive effects. As there is no strategic site or large mixed use site over the long term there will also be negative effects as it is unlikely to significantly stimulate the economy and encourage businesses to locate in the County. There is uncertainty how development impacts the Welsh language. This is likely to be both positive and negative. Many rural settlements would be classed as unserviced and these may also be areas where Welsh language levels are highest. If younger Welsh speaking people have to move to access housing this is likely to have a negative impact. It is also likely to encourage growth where the majority of the population is situated, in the north of the County such as in Rhyl or Prestatyn, which in the long term is likely to result in increased pressure to develop in flood risk areas which will have a negative impact on the reliance of communities to climate change. The implementation will determine the impact on finite resources and the historic and cultural built environment.												
	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Spatial Option 2: Strategic site &amp; serviced settlements</b>	Short 0 – 5 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Medium 6 – 10 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Long 11 – 20 years	+	+	+	+	+ / -	++	+	#	+	+	#	+
<b>Commentary</b>	Allocating growth in a strategic site and then distributing growth to serviced settlements is sustainable overall. It significantly helps the local economy in the long terms as it will encourage the use of employment land in the County. There is uncertainty how development impacts the Welsh language. Many rural settlements would be classed as unserviced and these may also be areas where Welsh language levels are highest. If younger Welsh speaking people have to move to access housing this is likely to have a negative impact. Welsh language is likely to be both positively and negatively impacted and implementation will determine the impact on finite resource and the cultural built environment.												

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Spatial Option 3: Strategic site &amp; all settlements</b>	Short 0 – 5 years	+	+ / -	+ / -	+ / -	+ / -	+ / -	+ / -	#	+ / -	+ / -	+ / -	+ / -
	Medium 6 – 10 years	+	+ / -	+ / -	+ / -	+ / -	+	+ / -	#	+ / -	+ / -	+ / -	+ / -
	Long 11 – 20 years	+	+ / -	+ / -	-	+ / -	+	+	-	-	+ / -	+ / -	-
<b>Commentary</b>	<p>Distributing growth to a strategic site and then distributing growth to all settlements will overall have a positive and negative impact although in the longer term, with the exception of the economic impact, it will become more negative and less sustainable. Growth in un-serviced settlements will encourage reliance on cars for everyday needs increasing air and noise pollution, increasing the demands on the transport infrastructure in settlements other than the strategic site. There will be increased pressure from development at sites of high quality land and non-statutory designed landscapes. The impact on the environment and infrastructure will become unsustainable in the long term. Some of the negative effects will be balanced by positive effects as a result of the designation of a mixed use site which will encourage developers to create employment opportunities and improve infrastructure. Balances can also be addressed by being flexible in facilitating growth where it is sustainable and preventing it where there is a risk to the landscape as well as ensuring that there is high quality open space and blue and green infrastructure.</p>												

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Spatial Option 4:</b>	Short 0 – 5 years	+	+ / -	-	-	+ / -	+	+	#	+ / -	+ / -	+ / -	+ / -
	Medium 6 – 10 years	+	+ / -	-	-	+ / -	+ / -	+ / -	-	-	+ / -	+ / -	-
<b>All Settlements</b>	Long 11 – 20 years	+	-	--	--	+ / -	+ / -	+ / -	--	--	-	-	--
<b>Commentary</b>	<p>Growth in all settlements will have a negative impact overall. There will be no focus on strategic sites to attract developers for employment opportunities and although in the short term this may encourage main or local centres to develop in the long term. It will also have negative effects when there are insufficient large sites particularly given that there are significant flood risks in the north of the County where the better transport infrastructure exists. There are unlikely to be significant benefits in infrastructure from development and allowing development in unserved villages increases the reliance on the car for everyday needs. It does not encourage the expansion of high quality, sustainable settlements and this impact will become increasingly negative over the long term. The use of finite resources will in the short term depend on implementation. Development pressure will result in a negative impact where high quality agricultural land and flood risk areas is put at risk of being developed which is enhanced without an allocated large mixed use site and growth being distributed to all settlements. Development pressure will similarly impact the landscape and historic built environment. The more significant impacts are on the environment and resilience to climate change with negative impacts on air quality and soil erosion.</p>												

8.6 The most sustainable spatial option is **option 2** which delivers growth at a strategic site as well as distributing growth to serviced settlements.



## IX. Assessment of the Key Policies of the Replacement LDP

- 9.1 Key Policies are intended to deliver the Replacement LDP Vision and Objectives. They are high level policies and more detail will be delivered later when the Replacement LDP is at Deposit stage.
- 9.2 Overall the Key Policies are sustainable and help in achieving sustainability in the Replacement LDP. The assessment against the SA Framework is provided under the heading commentary in Table 30 below.

Table 30 Replacement LDP Key Strategic Policies compared to SA Objectives.

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

		<ul style="list-style-type: none"> <li>• There is no link to finite resources (SA 8) or the environment (SA 9).</li> </ul>
SP 3	<p><b>Housing</b></p> <p>Provision will be made for 3,775 new homes across the plan period, to enable the requirement of 3,275 homes to be met.</p> <p>In order to meet local needs and demand, a range of housing types and tenures will be provided.</p>	<ul style="list-style-type: none"> <li>• It significantly helps in delivering homes that meet everyone's needs (SA 1) and healthier communities (SA 2).</li> <li>• Sufficient availability of housing should ensure a variety of tenure that will enable younger people to remain in Denbighshire and will discourage the conversion of employment land into residential land (SA 6).</li> <li>• It will be dependent on implementation as to how it impacts on green and blue infrastructure, open space (SA 3), public transport services and active travel opportunities (SA 4), town and rural centres (SA 7), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11) as well as ensuring resilience to climate change (SA 12).</li> <li>• This supports the locality and assists in creating a sense of place and appropriate housing for local people which creates opportunities to enhance the Welsh language (SA 5).</li> </ul>
SP 4	<p><b>Affordable Housing</b></p> <p>Provision will be made for a minimum of 750 affordable homes across the plan period.</p> <p>Affordable housing should be provided as on-site units and integrated into the proposed development, unless local needs require otherwise. The type and tenure of affordable housing to be provided will be informed by local need.</p>	<ul style="list-style-type: none"> <li>• It significantly helps in delivering homes that meet everyone's needs (SA 1) and healthier communities (SA 2).</li> <li>• Sufficient availability of affordable housing should enable younger people to remain in Denbighshire and will discourage the conversion of employment land into residential land (SA 6).</li> <li>• It will be dependent on implementation as to how it impacts on green and blue infrastructure, open space (SA 3), public transport services and active travel opportunities (SA 4), town and rural centres (SA 7), finite resources (SA 8), the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11) as well as ensuring resilience to climate change (SA 12).</li> <li>• This supports the locality and assists in creating a sense of place and appropriate housing for local people which creates opportunities to enhance the Welsh language (SA 5). There is a local connections requirement for affordable houses which supports retaining local people and therefore a higher proportion of Welsh speakers is likely.</li> </ul>
SP 5	<p><b>Employment Land</b></p> <p>Land will be provided for the development of employment premises on a mix of strategic</p>	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Helps in achieving homes that meet everyone's needs (SA 1), healthier communities (SA 2) and serviced communities (SA 4).</li> </ul>

	<p>and local sites to meet the County's employment needs.</p> <p>The provision of a range of employment sites will enable a range of businesses to start-up, invest, expand and grow.</p>	<ul style="list-style-type: none"> <li>• Implementation will impact on whether it delivers high quality green and blue infrastructure (SA 3) the impact on finite resources (SA 8), the environment (SA 9) and landscape (SA 10), the culturally important and historic built environment (SA 11) and climate change (SA 12).</li> <li>• This supports the locality and assists in creating job opportunities for local people and therefore a higher proportion of Welsh speakers is likely (SA 5).</li> </ul>						
SP 6	<p><b>Retail</b></p> <p>Proposals for new retail development will be supported in accordance with the retail hierarchy and where they are of a scale and nature appropriate to the settlement centre, along with the need for a sequential 'town centre first' approach. Principal and town centres will be the preferred location for new retail, leisure, office, social and other town centre uses. This approach will seek to maintain and enhance the viability and vibrancy of the County's principal, town and local centres.</p> <p>The retail hierarchy is:</p> <table border="1"> <tr> <td>Principal centres</td> <td> <ul style="list-style-type: none"> <li>• Rhyl</li> <li>• Prestatyn</li> </ul> </td> </tr> <tr> <td>Town centres</td> <td> <ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> <li>• Ruthin</li> </ul> </td> </tr> <tr> <td>Local centres</td> <td> <ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> <li>• St Asaph</li> </ul> </td> </tr> </table>	Principal centres	<ul style="list-style-type: none"> <li>• Rhyl</li> <li>• Prestatyn</li> </ul>	Town centres	<ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> <li>• Ruthin</li> </ul>	Local centres	<ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> <li>• St Asaph</li> </ul>	<ul style="list-style-type: none"> <li>• Significantly assists in achieving a strong local economy and successful regeneration (SA 6) in towns and rural centres (SA 7).</li> <li>• Retail premises in town centre creates designated premises helps deliver homes by ensuring that residential premises are not converted into retail premises (SA 1). Helps create opportunities for social inclusion and healthier communities (SA 2) where Welsh speakers will be retained and want to work (SA 5).</li> <li>• Implementation will determine the impact on high quality green and blue infrastructure (SA 3), transport services (SA 4) and finite resources (SA 8), the environment (SA 9), the landscape (SA 10), historic and cultural features (SA 11) and resilience to climate change (SA 12).</li> </ul>
Principal centres	<ul style="list-style-type: none"> <li>• Rhyl</li> <li>• Prestatyn</li> </ul>							
Town centres	<ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> <li>• Ruthin</li> </ul>							
Local centres	<ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> <li>• St Asaph</li> </ul>							
SP 7	<p><b>Bodelwyddan Strategic Site</b></p> <p>Land at Bodelwyddan is identified as a Strategic Site, in order to meet the development needs of the north of the County and deliver the plan's Preferred Strategy.</p> <p>Development will be phased over the plan period, and beyond, and will comprise housing (including</p>	<ul style="list-style-type: none"> <li>• It significantly helps the local economy, encouraging the use of employment land in the County and needs to be met locally (SA 6).</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2), green infrastructure (SA 3) and serviced communities (SA 4). In allocating a strategic site for development it helps to protect town and rural centres (SA 7), the environment (SA 9) and the landscape (SA 10) from unsustainable development and by using phasing the impact on the environment should be positive.</li> </ul>						

	affordable housing), employment and health, education, community, transport and green infrastructure required to support the development.	<ul style="list-style-type: none"> <li>• A Welsh language impact assessment has been undertaken and will be reviewed at Deposit stage (SA 5).</li> <li>• Implementation will determine the impact on finite resources (SA 8) and the cultural built environment (SA 11).</li> </ul>
SP 8	<p><b>Infrastructure</b></p> <p>Development will be directed to locations where the necessary infrastructure will be available.</p> <p>New developments will be expected to contribute to the provision of infrastructure, where necessary to mitigate the impacts of new development, comprising:</p> <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Recreation, open space and green infrastructure</li> <li>• Education</li> <li>• Sustainable transport and active travel</li> <li>• Regeneration</li> <li>• Welsh language</li> <li>• Telecommunications and Broadband</li> <li>• Any other Council priorities identified at the time of the application.</li> </ul>	<ul style="list-style-type: none"> <li>• Significantly helps in delivering well serviced communities (SA 4), a strong local economy (SA 6), town and rural centres (SA 7).</li> <li>• Helps in achieving homes for everyone (SA 1), healthier communities (SA 2), green and blue infrastructure (SA 3), increasing the number of Welsh speakers (SA 5) and communities that are resilient to climate change (SA 12).</li> <li>• Implementation will control how finite resources are utilised (SA 8), whether there is a positive or negative impact on the environment (SA 9), the landscape (SA 10), the culturally important and historic built environment (SA 11).</li> </ul>
SP 9	<p><b>Visitor Economy</b></p> <p>Proposals which strengthen and diversify the visitor economy will be supported, where they are suitably located and conserve the county's natural and built environment.</p>	<ul style="list-style-type: none"> <li>• It significantly helps the local economy (SA 6) and town and rural centres (SA 7) encouraging the use of employment land in the county and needs to be met locally (SA 6).</li> <li>• Strengthening the visitor economy and conserving the natural and built environment should contribute to creating healthier communities (SA 2), a diverse environment (SA 9), help maintain the landscape (SA 10) as well as the cultural and historic built environment (SA 11).</li> <li>• Implementation will impact on green and blue infrastructure (SA 3), how well communities are served (SA 4) control how finite resources are utilised (SA 8) and resilience to climate change (SA 12).</li> <li>• Tourist attractions could help to increase the understanding of the Welsh language and culture (SA 5 &amp; SA 11).</li> <li>• There is no direct link to creating homes that meet everyone's needs (SA 1).</li> </ul>

SP 10	<p><b>Transport &amp; Accessibility</b></p> <p>Proposals for new facilities, and improvements to existing facilities, which improve accessibility to employment and services, particularly by sustainable means, will be supported.</p> <p>Developments will be expected to make provision for Active Travel and green infrastructure as part of their design, and link into wider networks.</p>	<ul style="list-style-type: none"> <li>• Significantly helps in delivering high quality green and blue infrastructure (SA 3), well serviced communities (SA 4), a strong local economy (SA 6), town and rural centres (SA 7) and reducing the risks of climate change (SA 12).</li> <li>• Helps in achieving healthier communities (SA 2).</li> <li>• Implementation will impact on whether it controls how finite resources are utilised (SA 8). Implementation will determine whether there is a positive or negative impact on the environment (SA 9), the landscape (SA 10) as well as the culturally important and historic built environment (SA 11).</li> <li>• There is no direct link to creating homes that meet everyone's needs (SA 1) or the Welsh language (SA 5).</li> </ul>
SP 11	<p><b>Minerals</b></p> <p>Mineral resources will be safeguarded and Denbighshire will seek to contribute to regional and local demand in providing a continuous supply of minerals to meet the needs of industry and society as a whole.</p> <p>Wherever possible, aggregate requirements should come from secondary and recycled sources, before consideration is given to primary aggregates.</p>	<ul style="list-style-type: none"> <li>• Significantly helps in ensuring finite resources are utilised responsibly (SA 8).</li> <li>• It will help the local economy (SA 6), town and rural centres (SA 7) and facilitate a diverse environment (SA 9) as well as promoting communities that are resilient to climate change (SA 12).</li> <li>• It will depend upon implementation as to how it will impact the landscape (SA 10) and built environment (SA 11).</li> <li>• There is no direct link to creating homes that meet everyone's needs (SA 1), healthier communities (SA 2), green and blue infrastructure (SA 3), well served communities (SA 4) or the Welsh language (SA 5).</li> </ul>
SP 12	<p><b>Waste Management</b></p> <p>Proposals must support the prevention of waste in the first instance and, where this is not possible, minimise the impact on the environment through re-use and recycling of waste.</p> <p>Proposals for waste management facilities must demonstrate how they support the movement of waste up the waste hierarchy, are supported by evidence of need and do not result in unacceptable impacts on amenity.</p>	<ul style="list-style-type: none"> <li>• Significantly assists in ensuring resources are utilised responsibly (SA 8).</li> <li>• Helps in delivering healthier communities (SA 2) and maintaining rural and town centre services (SA 7). It helps in maintaining a diverse environment (SA 9), the landscape (SA 10) and ensuring resilience to climate change (SA 12).</li> <li>• This may have a positive and negative impact on delivering homes that meet everyone's needs (SA 1) and the local economy (SA 6).</li> <li>• It will depend upon implementation as to how it will impact green and blue infrastructure (SA 3), transport services (SA 4) and the built environment (SA 11).</li> <li>• There is no direct link to increasing Welsh speakers (SA 5).</li> </ul>
SP 13	<p><b>Natural &amp; Built Environment</b></p> <p>Denbighshire's natural and built environment will be protected from development that adversely affects their protected</p>	<ul style="list-style-type: none"> <li>• Significantly helps in delivering a diverse environment (SA 9), protecting the landscape (SA 10) and historic built environment (SA 11).</li> <li>• Helps in delivering healthier communities (SA 2), high quality green and blue infrastructure (SA 3),</li> </ul>

<p>characteristics, features, or their setting.</p> <p>All planning proposals must contribute towards the preservation and, where possible, the enhancement of the natural and built environment.</p>	<p>regeneration (SA 6) in rural and town centres (SA 7), the responsible use of finite resources (SA 8) and resilient communities (SA 12).</p> <ul style="list-style-type: none"> <li>• This may have a positive and negative impact on delivering homes that meet everyone's needs (SA 1)</li> <li>• Implementation will determine how it impacts transport services (SA 4) and the number of Welsh speakers (SA 5)</li> </ul>
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9.3 The assessment of the Key Policies in terms of the SA assessment matrix can be seen in Table 31 below.

Table 31: SA Assessment Matrix of Replacement LDP Key Strategic Policies.

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

## X. No Plan Scenario

- 10.1 The scenario of there being no plan is assessed according to the SEA Directive requirements to determine the impacts on sustainability.
- 10.2 Denbighshire's adopted Local Development Plan (LDP) runs out at the end of December 2021. If there is no replacement LDP in place, then planning will be subject to national policy only. Currently the contents of the National Development Framework are not known and therefore no assumptions have been made as to how it will impact Denbighshire if there was no LDP. The implications are predicted and evaluated in Table 32 below.

Table 32: Consideration of SA Objectives when there is no LDP

SA Objective		National Policy only from December 2021
SA 1: Everyone lives in homes that meet their needs.	-	National policy encourages residential development which helps in achieving the SA objective. National policy however, does not assess the needs of residents in Denbighshire and Denbighshire in respect of housing, is not in line with the Wales average. Market house building will continue a trend of developing larger detached homes, which are unaffordable for many residents in Denbighshire. There would be no affordable housing policy. Overall, therefore, national policy would hinder the SA objective.
SA 2: Communities are healthier.	+ / -	National policy supports sustainable development and the wellbeing of the population, which positively assists in delivering healthier communities. It does not provide for local requirements and would not address the pockets of deprivation in the County. Without land being allocated for development, any development is likely to be on a small scale. Small scale development is likely to be insufficient to benefit or deliver substantive improvements to the community including in respect of delivering healthier alternatives such as green infrastructure and open space or facilities and services.

<p><b>SA 3:</b> Denbighshire has high quality green and blue infrastructure and open space.</p>	-	<p>National policy recommends the creation and maintenance of green and blue infrastructure, although there would be no mechanism to obtain contributions towards the creation or maintenance cost. Opportunities for enforcing high quality design would be limited with reliance on national policy and Building Regulations. Overall, it is likely to have a negative impact.</p>
<p><b>SA 4:</b> Local communities are well served by public transport and provided with multiple opportunities to engage in active travel.</p>	-	<p>National policy supports sustainable development, although it will not rule out development in unsustainable locations assessed on a case by case basis. Inappropriately sited development could contribute to air pollution, from additional road traffic and flooding.</p>
<p><b>SA 5:</b> Denbighshire has an increasing number of Welsh speakers.</p>	-	<p>National policy seeks to protect the Welsh language. It would be more difficult to achieve financial contributions, such as for education and encouraging Welsh learning schemes.</p>
<p><b>SA 6:</b> There is a strong local economy and successful regeneration.</p>	- -	<p>National policy encourages the growth of Wales' economy, although it does not have mechanisms to reverse the outwards migration of younger people from Denbighshire or improve the pockets of deprivation in the County. It would be difficult for Denbighshire to direct businesses to the most sustainable locations in the County.</p>
<p><b>SA 7:</b> Denbighshire's town and rural centres are not in decline.</p>	- -	<p>National policy encourages growth in sustainable locations with a 'town centre first' principle, however it does not prevent retail developments, which could impact on town and rural centres. There would be fewer economic incentives for regeneration.</p>



<p><b>SA 8:</b> Denbighshire's finite resources are utilised responsibly.</p>	<p>+ / -</p>	<p>National policy as well as agencies such as NRW provide guidance on limiting climate change, flooding, the use of SUDs, safeguarding of minerals, air quality and encourage renewable energy technologies.</p>
<p><b>SA 9:</b> The environment is diverse, attractive and facilitates the wellbeing of all living organisms.</p>	<p>-</p>	<p>National policy seeks to achieve the growth in Wales' economy including the ambitious renewable energy targets, which could be prioritised over statutory or non-statutory habitat, species and landscape designations. Increased tourist accommodation could have detrimental impacts on landscape, housing, biodiversity, infrastructure and air quality. Uncontrolled development in the historic landscape, open countryside and on high quality agricultural land. There would be limited action that could be taken at a local level regarding the recovery of species.</p>
<p><b>SA 10:</b> Denbighshire's landscape portrays its history, natural beauty and culture.</p>	<p>+ / -</p>	<p>International and national policy protects statutory designated landscapes which helps in achieving the SA objective. National policy however, does not comprehensively protect local designated or non-designated landscapes. National policy would therefore also hinder the SA objective.</p>
<p><b>SA 11:</b> Denbighshire has high quality historic buildings, archaeological sites and culturally important features.</p>	<p>+ / -</p>	<p>International and national policy protects listed buildings and designated built heritage, which helps in achieving the SA objective. National policy however does not comprehensively protect locally important historic or cultural features. National policy would therefore also hinder the SA objective.</p>

<p><b>SA 12:</b> Local communities are resilient to the effects of climate change, including an increased risk of flooding.</p>	<p>+ / -</p>	<p>National policy, as well as agencies such as NRW, provide guidance on limiting climate change, flooding, as well as the use of SUDs and encourage renewable energy technologies. Development is required to be situated in sustainable locations. Without land being allocated for development it is likely to be on a small scale that would not create the benefits to infrastructure and obtaining financial compensation would be difficult.</p>
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10.3 Ensuring that the needs of Denbighshire are addressed and that the impacts noted in Table 32 above are mitigated can be undertaken by adopting a Replacement LDP.

## **XI. Preferred Strategy Assessment**

11.1 The Draft Preferred Strategy for the Replacement LDP aims to direct the overall level and location of development within Denbighshire between 2018 and 2033. It consists of the Vision (Section VI), Objectives (Section VII) and Key Policies (Section X) as discussed earlier in this report. The Strategic Options are a combination of options set out earlier in this report.

11.2 The **preferred growth option** is:-

- A total dwelling requirement of 3,775 over the plan period, which equates to 251 dwellings per annum. This is to ensure delivery of 218 dwellings per annum being 3,275 dwellings between 2018 and 2033.
- The provision of 750 affordable homes over the plan period, which equates to 50 affordable homes per annum.
- An allocation of 68.6 hectares of employment land, to accommodate a forecasted land requirement of 47.6 hectares plus a flexibility buffer; to provide a choice in sites, catering for both the needs of local business and to allow for larger developments.

11.3 The **preferred spatial option** is:-

- Focus development in Bodelwyddan Strategic Site and serviced settlements: the top three tiers in the settlement hierarchy (main centres, local centres and villages) with more limited growth in other unserviced settlements (infill and small sites within development boundaries), primarily focussed on meeting local needs.

11.4 The assessment of the preferred strategic options is set out in Table 33 below:-

Table 33: SA Assessment Matrix and commentary on Replacement LDP Draft Preferred Strategy.

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Preferred Growth Strategy</b>	Short 0 – 5 years	+	+	#	+	+ / -	+	+	#	#	#	#	+
	Medium 6 – 10 years	+	+	#	+	+ / -	+	+	#	#	#	#	+
	Long 11 – 20 years	++	+	#	+	+ / -	++	+	#	#	#	#	+
<b>Commentary</b>	<p>The total requirement of 251 annual dwellings are 31 more dwellings than the JLHMA 15 year trend (220). The delivery target of 218 dwellings per annum is 2 less than the JLHMA 15 year trend. 50 affordable homes per annum is in line with the current delivery trend of 56 affordable homes per annum. This strongly supports delivering homes that meet everyone’s needs and encourages expansion of high quality settlements (SA 1). This level of housing does not negatively impact on high quality agricultural land, flood zone areas or natural beauty spots and habitats. It should also allow consideration to be given to climate change (SA 12). The impact on the population growth is unknown and it is assumed that community expansion will be moderate and phased given the proposed preferred spatial strategy and key strategic policies. The impact on communities (SA 2) and the transport network are mitigated by the provision of a strategic mixed use site. Allocated land helps in maintaining and delivering infrastructure (SA 4). Implementation will determine the impact on high quality green and blue infrastructure (SA 3) finite resources (SA 8), the environment (SA 9), the landscape (SA 10), as well as historic and cultural features (SA 11). When considering the spatial strategy however, the impact on the environment and landscape should be positive, at least in the short term, given that there will be sufficient appropriately allocated residential and employment land.</p> <p>47.6 hectares of employment land is in line with the recommendations of the ELEGA and strongly supports the local economy, job creation and regeneration (SA 6). It also helps in ensuring town and rural centres are regenerated (SA 7)</p> <p>There is no clear trend as to how development impacts on the Welsh language. This growth option supports the locality, assists in creating a sense of place, appropriate housing and job opportunities for local people where a higher proportion of Welsh speakers are likely to be retained (SA 5).</p>												

	Timescale	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
<b>Preferred Spatial Strategy</b>	Short 0 – 5 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Medium 6 – 10 years	+	+	+	+	+ / -	+	+	#	+	+	#	+
	Long 11 – 20 years	+	+	#	#	+ / -	++	+	#	#	#	#	+
<b>Commentary</b>	<p>Allocating growth in a strategic site and then distributing growth to serviced settlements is sustainable overall. It significantly helps the local economy (SA 6) in the long term, as it will encourage the use of employment land in the County and encourage needs to be met locally. Welsh language (SA 5) is likely to be both positively and negatively impacted and will need to be monitored, particularly in terms of allowing infill and/or small developments in un-serviced settlements. Supporting serviced settlements and allowing some flexibility for local need is likely to retain Welsh speakers. This is mitigated in terms of any strategic site which will require a Welsh Language Impact Assessment as has been undertaken for Bodelyyddan and which will be reviewed at Deposit stage. Similarly too much growth in unserviced settlements could have negative consequences over the long term. Implementation, including mitigation measures, will determine the impact on finite resource (SA 8) and the cultural built environment (SA 11). Over the longer term it will also be down to implementation as to how much flexibility is permitted and whether there is a positive or negative impact on the environment (SA 9), landscape (SA 10), blue and green infrastructure and air and noise pollution (SA 3 and 4).</p> <ul style="list-style-type: none"> <li>• <i>Allowing development growth in unserviced settlements to meet the local need in itself is unsustainable. The nature of the growth will need to be limited and the cumulative effect of permitting such development will need to be assessed. In the longer term how the implementation will occur should be defined to provide clarity. These impacts can be mitigated by tightly drawing boundaries to indicate where the infill and small sites will occur. Mitigation can also be achieved by developing robust policies that strengthen, clarify and support the key strategic policies, as well as directing development to sustainable locations and defining small sites as no more than 10 units.</i></li> </ul>												

11.5 The assessment of the Replacement LDP Draft Preferred Strategy together with the Vision, Objectives and Key Policies indicates that they are sustainable overall. A summary of the SA can be seen in terms of the SA assessment matrix in Table 34 below.

Table 34: SA Assessment Matrix on Replacement LDP.

Strategic Policy	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12
Vision	+	+	+	+	+	+	+	?	+	+	+	+
Objectives	+	+	+	+	+	+	+	#	#	#	#	+
Growth Option	++	+	#	+	+ / -	++	+	#	#	#	#	+
Spatial Option	+	+	#	#	+ / -	++	+	#	#	#	#	+
SP 1	+	++	+	+	++	+	+	+	+	+	+	++
SP 2	+ / -	+ / -	+ / -	+ / -	++	+ / -	+ / -	No link	No link	+	+	+ / -
SP 3	++	++	#	#	+ / -	+	#	#	#	#	#	#
SP 4	++	++	#	#	+ / -	+	#	#	#	#	#	#
SP 5	+	+	#	+	+ / -	++	++	#	#	#	#	#
SP 6	+	+	#	#	+	++	++	#	#	#	#	#
SP 7	+	+	+	+	+ / -	++	+	#	+	+	#	+
SP 8	+	+	+	++	+	++	++	#	#	#	#	+
SP 9	No link	+	#	#	+ / -	++	++	#	+	+	+	#
SP 10	No link	+	++	++	No link	++	++	#	#	#	#	++
SP 11	No link	No link	No link	No link	No link	+	+	++	+	#	#	+
SP 12	+ / -	+	#	#	No link	+ / -	+	++	+	+	#	+
SP 13	+ / -	+	+	#	#	+	+	+	++	++	++	+

11.6 Although there are no negative indicators, there are effects that are both positive and negative or will be determined on implementation. Mitigation action is possible. Significant impacts are therefore noted in Table 35 below, together with the steps required to mitigate those potential impacts.

Table 35: Mitigation of Potential Significant Impacts of Draft Preferred Strategy.

Significant Impacts	Effect Mitigation / Action
Air pollution	<ul style="list-style-type: none"> <li>• Any significant transport project in Denbighshire should include an assessment of its impact on air quality.</li> <li>• Ensure site allocations are sustainably located with access to public transport and opportunities for active travel.</li> </ul>
Water capacity	<ul style="list-style-type: none"> <li>• Dŵr Cymru / Hafren Dyfrdwy to provide input on developments in respect of water and waste infrastructure and capacity.</li> <li>• Water use minimisation and conservation to be encouraged as part of site designs.</li> </ul>
Welsh Language	<ul style="list-style-type: none"> <li>• Ensure site allocations are assessed in terms of Welsh language impact and that any mitigation measures are specific to the proposal.</li> <li>• Consider introducing, if appropriate, a scheme that contributes to measures that promote the Welsh language.</li> </ul>
Finite resources, the natural, agricultural, historic as well as cultural environment and landscape.	<ul style="list-style-type: none"> <li>• Ensure site allocations are sustainably located with consideration of cumulative effects, as well as landscape and environmental features.</li> <li>• Develop robust policies.</li> <li>• Incorporate guidance from the Habitats Appraisal.</li> </ul>

## **XII. Habitats Regulations Appraisals**

- 12.1 The Council is in the early stages of producing a Replacement Local Development Plan (RLDP) which will guide future development in Denbighshire. The RLDP will be used in determining planning applications and appeals. Prior to adoption of the draft RLDP by the local planning authority, it must be assessed on its conformity with the 'The Conservation of Habitats and Species Regulations 2017' (Habitats Regulations). The aim of the Habitats Regulations is to avoid any significant adverse effects, caused by individual Plan elements, on internationally designated sites of nature conservation. At this stage in the Plan-preparation process, i.e. Pre-Deposit, the focus is on the countywide level and distribution of future growth. Specific growth levels for each town / village and site-specific land allocations will be considered and assessed at the following, Deposit, stage.
- 12.2 All elements of the Pre-Deposit document have been screened with regard to the likelihood of significant adverse effects on concerned European sites and their qualifying features. Based on the information available, their occurrence could not be excluded. An appropriate assessment is required for further evaluation, including the implementation of any mitigation measures. An appropriate assessment has not been carried out at this stage, because there is insufficient information on local policy implementation and the location of individual sites.
- 12.3 The Habitats Regulations Appraisal of a plan is an iterative process, which allows the proposer to refine individual elements, as the draft plan progresses through the individual preparation stages. The screening exercise of the Pre-Deposit highlighted individual elements that might be subject to amendments, including the consideration of avoidance or mitigation measures, to prevent the necessity of carrying out an appropriate assessment at Deposit stage.



### **XIII. Conclusions and Next Steps**

- 13.1 The Draft Preferred Strategy will support production of the Deposit LDP and the deliverability of sustainable development in Denbighshire.
- 13.2 The Draft Preferred Strategy is the most sustainable in terms of meeting the housing provision, affordable housing and employment land need.
- 13.3 Distributing growth to serviced settlements together with at least one larger, strategic site is the most sustainable option.
- 13.4 Allowing flexibility of growth, in terms of infill and small sites outside of serviced settlements, will have to be considered carefully. This SA report requires that there be consideration as to how to assess and mitigate effects, particularly cumulative effects, arising from permitting development in unserviced settlements.
- 13.5 Impacts on finite resources and the natural, historic, cultural, as well as the built environment and landscape will depend on how the key policies and strategic options are implemented.
- 13.6 Mitigation measures have been recommended where there are potentially significant impacts which includes air pollution and water capacity.
- 13.7 This report will be updated and revised as the Replacement LDP progresses. Further detailed policies will be drafted and individual site allocations made. These will be assessed and considered for mitigation measures at the Deposit stage, in the updated SA report. At the same time the monitoring framework will be revised and updated. This will reflect stages D1 and D2 (i) of the SA / SEA as can be seen in Table 1 in Section II of this report.
- 13.8 This Initial SA Report will form part of the Draft Preferred Strategy, which will be open to public consultation for a minimum period of eight weeks.

## Appendix A: SA / SEA Stage A1: Plans, Policies, Programmes

### International

United Nations Economic Commission for Europe	Aarhus Convention	1998
United Nations Department of Economic and Social Affairs	Agenda 21, Rio Declaration on Environment and Development and The Convention on Biological Diversity	1992
The Bern Convention	Bern Convention on the conservation of European wildlife and natural habitats	1982
World Health Organisation	Children's Environment and Health Action Plan for Europe (CEHAPE)	2004
EU Commission	Common Agricultural Policy	1958/2013
The Council of the European Communities	EU Directive 1999/31/EC (the Landfill of Waste Directive)	1999
The Council of the European Communities	EU Directive 2000/60/EC (the Water Framework Directive)	2000
The Council of the European Communities	EU Directive 2002/49/EC (Directive on Environmental Noise)	2002
The Council of the European Communities	EU Directive 2003/35/EC (Directive providing for Public Participation)	2003
The Council of the European Communities	EU Directive 2004/35/CE (the Environmental Liability Directive)	2004
The Council of the European Communities	EU Directive 2007/60/EC (the Floods Directive)	2007
The Council of the European Communities	EU Directive 2008/50/EC (Ambient Air Quality and Cleaner Air for Europe)	2008
The Council of the European Communities	EU Directive 2008/98/EC (the Waste Framework Directive)	2008
The Council of the European Communities	EU Directive 2014/52/EU (the Environmental Impact Assessment Directive)	2014
The Council of the European Communities	EU Directive 76/160/EEC (Bathing Water Quality Directive) (2006 revised)	2006
The Council of the European Communities	EU Directive 91/271/EEC (the Urban Waste Water Directive)	1991
The Council of the European Communities	EU Directive 91/676/EEC (the Nitrates Directive)	1991

The Council of the European Communities	EU Directive 92/43/CEE (The Habitats Directive)	1992
EU Commission	EU Rural Development Policy 2014-2020	2014
EU Commission	Europe 2020 Strategy- Broad Economic Policy Guidelines-European Employment Strategy	2015
The European Parliament and the Council of the European Union	European Landscape Convention Council of Europe	2000
The European Parliament and the Council of the European Union	European Soils Charter	2003
The European Parliament and the Council of the European Union	European Spatial Development Perspective (ESDP)	1999
The European Parliament and the Council of the European Union	Our Future, Our Choice (EU Sixth Environment Action Programme)	2010
The Council of the European Communities	Renewable Energy Directive (2009/28/EC)	2009
The Council of the European Communities	The Birds Directive (2009/147/EC)	2009
United Nations Climate Change Conference	The Cancun Climate Change Conference	2010
EU Commission	The EU Biodiversity Strategy to 2020	2011
United Nations World Summit on Sustainable Development	The Johannesburg Declaration of Sustainable Development	2002
EU Commission	The Second European Climate Change Programme (ECCP II)	2005
EU Commission	Thematic Strategy on Air Quality	2005
United Nations Climate Change Conference	United Nations Framework Convention on Climate Change (UNFCCC):The Paris Agreement	2016
United Nations World Summit on Sustainable Development	United Nations Sustainable Development Summit New York: Transforming Our World: The 2030 Agenda for Sustainable Development	2015

## National

UK Government	Ancient Monuments & Archaeological Areas Act	1979
UK Government	Carbon Plan: Delivering our low carbon future	2011
UK Government	Child Poverty Strategy	2011
CADW	Circular 07/09 Protection of World Heritage Sites	2009
UK Government	Climate Change Act	2008
DEFRA	Code of practice for the sustainable use of soils on construction sites	2011
DEFRA	Conserving Biodiversity – The UK Approach	2007
UK Government	Countryside and Rights of Way Act	2000
UK Government	Dealing with contaminated land in England and Wales	2009
Department of Energy and Climate Change, UK Government	Electricity Market Reform White Paper (2011) Department of Energy and Climate Change.	2011
UK Government	Energy Act	2016
UK Government	Energy White Paper: Meeting the Energy Challenge	2007
UK Government	Environmental Permitting (England and Wales) Regulations 2010 SI 675	2010
UK Government	Flood Risk Regulations	2009
UK Government	Marine & Coastal Access Act	2009
DEFRA	Marine Strategy part three: UK Programme of Measures	2015
DEFRA	National Policy Statement for Waste Water	2012
UK Government	Planning (Listed Buildings and Conservation Areas) Act	1990
DEFRA	Securing the Future: The Government's Sustainable Development Strategy	2005
HM Treasury	Stern Review: the economics of climate change	2006
DEFRA	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	2000
UK Government	The Conservation of Habitats and Species Regulations (England and Wales)	2010
UK Government	The Equality Act	2010
DEFRA	The Groundwater (England and Wales) Regulations 2009	2009
UK Government	The Hedgerows Regulations	1997
UK Government	The natural choice: securing the value of nature	2011
UK Government	The Natural Environment and Rural Communities Act	2006
UK Biodiversity Partnership and the UK Government	The UK Post-2010 Biodiversity Framework	2012

NRW; RTPi; WLGA; LGA	The Water Framework Directive and Planning – Initial Advice to Planning Authorities in England and Wales	2006
DEFRA	Waste Strategy	2007
UK Government	Water and Flood Management Act	2010
Natural Resources Wales	Water for People and the Environment: Water Resource Strategy for England and Wales	2009
UK Government	Water Resources Act	1991
Natural Resources Wales	Water Resources for the Future: Strategy for England and Wales	2001
Natural Resources Wales	Water Resources in England & Wales - Current State & Future Pressures	2008
UK Government	Water Resources Planning: Managing Supply and Demand	2017
UK Government	Wildlife and Countryside Act 1981 (as amended)	1981

Welsh Government	A living language - a language for living' 2012 - 2017	
Welsh Assembly Government	A Low Carbon Revolution - The Welsh Assembly Government Energy Policy Statement (2010)	2010
Welsh Government	Active Travel (Wales) Act	2013
Welsh Government	Active Travel Action Plan for Wales	2016
	Adaption Delivery Plan (2010)	
Welsh Government	Arbed - Strategic energy performance investment programme	2009
	Children and Families (Wales) Measure 2010	2010
Welsh Government	Circular 30/2007 'Planning for Gypsy and Traveller Caravan Sites'	2007
Welsh Government	Climbing Higher. The Welsh Assembly Government Strategy for Sport & Physical Activity Welsh Government 2005/ Climbing Higher Next Steps, Welsh Assembly Government 2006	2005
	Communities First 2012	2012
CADW	Conservation Principles of sustainable management of the historic environment in Wales (Cadw, 2011)	2011
Welsh Assembly Government	Designed for Life (2005)	2005
Welsh Government	Economic renewal: a new direction	2010
Welsh Government	Energy Efficiency in Wales: A strategy for the next 10 years 2016-2026	2016

Welsh Government	Energy Wales: A Low Carbon Transition	2012
Welsh Government	Environment (Wales) Act 2016	2016
Welsh Government	Environment Strategy for Wales	2006
Welsh Government	Flooding in Wales; A National Assessment of Flood Risk, EAW (2009)	2009
Welsh Government	Fuel Poverty Strategy	2010
Welsh Government	Fulfilled Lives, Supportive Communities	2007
Natural Resources Wales	Glas Tir Sustainable Land Management Scheme	2012
Natural Resources Wales	Groundwater Protection: Principles and Practice	
Welsh Government	Historic Environment (Wales) Act 2016	2016
Welsh Government	Housing (Wales) Act	2014
Welsh Government	Local Air Quality Management (LAQM) in Wales: Policy Guidance	2017
Welsh Government	Local Government Act Part 1- Community Strategies	2000
Welsh Government	Making the most of Wales' Coast - the Welsh Integrated Coastal Zone Management Strategy	2007
Welsh Government	Micro-Generation Action Plan for Wales	2007
Welsh Government	Minerals Technical Advice Note (Wales) 1: Aggregates	2004
Welsh Government	Minerals Technical Advice Note 2: Coal	2009
Welsh Government	National Energy Efficiency and Savings Plan	2011
Welsh Government	National Housing Strategy – 'Improving Lives and Communities – Homes in Wales'	2013
Welsh Government	National Strategy for Flood and Coastal Risk Management: Wales	2011
Welsh Government	National Transport Plan (2010)	2010
Welsh Government	Nature Recovery Action Plan for Wales	2015
Welsh Government	One Wales: A progressive agenda for the government of Wales	2007
Welsh Government	One Wales: Connecting the Nation. The Wales Transport Strategy	2008

Welsh Government	One Wales: One Planet, a new Sustainable Development Scheme for Wales	2009
Welsh Government	Partnership for Growth: Strategy for Tourism 2013-2020	2013
Welsh Government	Planning (Wales) Act	2015
Welsh Government	Planning for Climate Change- Guidance for Local Authorities	2012
Welsh Government	Planning for Renewables and Low Carbon Energy - A Toolkit for Planners	2010
Welsh Government	Planning Policy Wales (Edition 10, December 2018)	2018
Welsh Government	Planning Policy Wales (Edition 9, Nov 2016)	2016
CADW and NRW	Register of Landscapes of Outstanding Historic Interest in Wales	1998
Welsh Government / Natural Resources Wales / CADW	Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales	
Welsh Government	Renewable Energy Route Map for Wales	2009
Welsh Government	Rural Development Plan 2014-2020: Next Steps	2012
Welsh Government	Safe Routes in Communities	2008
Welsh Government	Strategy for Older People in Wales (2013 -2023)	2013
Welsh Government	Sustainable Development Action Plan (Wales) 2004-2007	2004
Welsh Government	Technical Advice Note 1: Joint Housing Land Availability Studies	2015
Welsh Government	Technical Advice Note 10: Tree Preservation Orders	1997
Welsh Government	Technical Advice Note 11: Noise	1997
Welsh Government	Technical Advice Note 12: Design	2014
Welsh Government	Technical Advice Note 13: Tourism	1997
Welsh Government	Technical Advice Note 14: Coastal Planning	1998
Welsh Government	Technical Advice Note 15: Development and Flood Risk	2004
Welsh Government	Technical Advice Note 16: Sport, Recreation and Open Space	2009

Welsh Government	Technical Advice Note 18: Transport	2007
Welsh Government	Technical Advice Note 19: Telecommunications	2002
Welsh Government	Technical Advice Note 2: Planning and Affordable Housing	2006
Welsh Government	Technical Advice Note 20: Planning and the Welsh Language	2017
Welsh Government	Technical Advice Note 21: Waste	2014
Welsh Government	Technical Advice Note 23: Economic Development	2014
Welsh Government	Technical Advice Note 24: The Historic Environment	2017
Welsh Government	Technical Advice Note 4: Retailing and Town Centres	1996
Welsh Government	Technical Advice Note 5: Nature Conservation and Planning	2009
Welsh Government	Technical Advice Note 6: Planning for Sustainable Rural Communities	2010
Welsh Government	Technical Advice Note 7: Outdoor Advertisement Control	1996
Welsh Government	Technical Advice Note 8: Renewable Energy	2005
Welsh Government	The Climate Change Strategy for Wales	2010
Welsh Government	The National Strategy for Flood and Coastal Erosion Risk Management (Wales)	2011
Welsh Government	The Waste (England and Wales) Regulations	2011
Welsh Government	Towards Zero Waste – Waste Strategy for Wales	2010
Welsh Government	Vibrant and Viable Places: New Regeneration Framework	2013
Welsh Government and Wales Biodiversity Partnership	Wales Biodiversity Framework	
Welsh Government	Wales Spatial Plan	2008
Welsh Government	Wales: A Better Country	2003
Welsh Government	Water Strategy for Wales	2015
Welsh Government	Well-being of Future Generations (Wales) Act 2015	2015



Welsh Government	Welsh Coastal Tourism Strategy	2008
Welsh Government	Welsh Housing Quality Standard revised guidance	
Welsh Government	Welsh Language (Wales) Measure 2011 and The Welsh Language Standards Regulations (No.1)	2015
Welsh Government	Woodlands for Wales	2009

## Regional

North Wales Economic Ambition Board	A Growth Vision for the Economy of North Wales	2016
Natural resources Wales	Conwy and Clwyd Catchment Flood Management Plan	2010
Natural Resources Wales	Dee River Basin Management Plan 2015-2021	2015
North East Wales Local Biodiversity Action Plan Partnership	North East Wales Local Biodiversity Action Plan	2003
North Wales Regional Waste Group	North Wales Regional Waste Plan 1st Review	2009
North West and North Wales Coastal Group	North West England and North Wales Shoreline Management Plan SMP2	2010
North Wales Economic Ambition Board	Regional Employment Land Strategy for North Wales - Strategy Document	2014
Natural Resources Wales	River Dee Catchment Flood Management Plan	2010
TAITH (now disbanded)	The North Wales Joint Local Transport Plan (Taith 2015)	2015
Natural Resources Wales	The Tidal Clwyd Flood Risk Management Strategy	2011

## Local

Denbighshire County Council	Bodelwyddan Key Strategic Site: Sustainable Resource and Waste Management Strategy	2010
Denbighshire County Council	Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) Management Plan	2014

Conwy County Borough Council and Denbighshire County Council.	Conwy and Denbighshire Landscape Sensitivity and Capacity Assessment for Wind Energy Development.	2013
Conwy and Denbighshire Public Services Board.	Conwy and Denbighshire Public Services Board Well-being Plan (2018 – 2023)	2018
Denbighshire County Council	Corporate Plan 2017 – 2022: Working together for the future of Denbighshire	2017
Denbighshire County Council	Denbighshire County Council Local Development Plan (adopted)	2013
Denbighshire County Council	Denbighshire Destination Management Plan 2013 – 2017	2014
Denbighshire County Council	Denbighshire Joint Housing Land Availability Studies	Annual (2018 latest)
Denbighshire County Council	Denbighshire Local Development Plan - Open Space Assessment and Audit	2018
Denbighshire County Council	Denbighshire Local Flood Risk Management Strategy 2013-2017	2014
Denbighshire County Council (Corporate Research and Information Unity, Conwy County Borough Council)	Denbighshire Retail Study 2018 – Retail Capacity	2018
Denbighshire County Council	Denbighshire Town Centre Health Check 2018	2018
Denbighshire County Council / JBA Consulting	Denbighshire's (Strategic) Flood Consequence Assessment – Level 1	2018
Denbighshire County Council	Denbighshire's Housing Strategy 2016 - 2021	2015
Denbighshire County Council	Denbighshire's Welsh Language Strategy (2017 – 2022)	2017
Denbighshire County Council	Economic & Community Ambition Strategy 2013 – 2023	2013
Denbighshire County Council/ Denbighshire Countryside Services	Local Biodiversity Action Plan	2003
Denbighshire County Council	Local Housing Market Assessment – Need, Demand and Affordability in Denbighshire 2015-2017	2015
Denbighshire County Council	Rights of Way Improvement Plan (ROWIP) Denbighshire 2013-2017	2013
Denbighshire County Council	School Transport Policy: Home to School Eligibility Policy	2014

## Appendix B: SA / SEA Stage A4: Potential Cumulative Effects

Potential Cumulative Effect	Causes	Impact
Fragmentation or loss of green and blue infrastructure or open space.	Use of land for new infrastructure, housing, employment or other development.	Negative: health and wellbeing of humans; loss of habitat and species.
Degradation of water quality.	Use of land for new infrastructure housing, employment or other development that results in additional water runoff and/or contamination of water sources.	Negative: health and wellbeing of humans; loss of habitat and species.
Increased flood risk.	Use of land for new infrastructure housing, employment or other development that results in additional water runoff.	Negative: health and wellbeing of humans; loss of habitat and species. Increased risks to the built environment and heritage.
Increase in ambient noise levels.	Increase in the number of road users as a result of development.	Negative: health and wellbeing of humans; loss of habitat and species.
Increase in air pollution.	Increase in the number of road users as a result of development.	Negative: health and wellbeing of humans; loss of habitat and species.
Climate change	Increase in CO <sub>2</sub> emissions and air pollution as a result of transport, housing and employment development together with an increase in road users.	Negative: health and wellbeing of humans; loss of habitat and species.
Deterioration of the natural environment through habitat loss and fragmentation.	Use of land for new infrastructure, housing, employment or other development.	Negative: human health, loss of habitat, species, AONB, SSSI, SPA, SAC and locally important sites facilitating biodiversity.
Deterioration of historically and culturally important features and buildings.	Use of land for new infrastructure, housing, employment or other development where the design is inappropriate or unsympathetic and/or creates disturbance such as through increased traffic flows.	Negative: listed buildings, heritage landscapes and conservation areas.
Creating a strong local economy and attracting investment.	Providing employment land for development, encouraging outdoor tourism and regeneration.	Positive: residents, human health and well-being, built environment.
Improved accessibility to services.	Increased public transport provision and active travel networks. Locating development in sustainable locations with access to services.	Positive: residents.
Reducing the number of road users, traffic and congestion.	Increased public transport provision and active travel networks. Locating development in sustainable locations.	Positive: residents, human health, diverse environment and landscape.
Improving health and well-being.	Increased active travel networks, high quality blue and green infrastructure and open space. Ensuring resilience to climate change and providing opportunities for social inclusion in communities. Improving air quality. Preserving the natural environment and landscape.	Positive: residents, human health.

## Appendix C: Settlement Hierarchy

Category	Definition	Settlements
Main centre	Settlements with a strategic role in delivery of a variety of services and facilities.	<ul style="list-style-type: none"> <li>• Denbigh</li> <li>• Llangollen</li> <li>• Prestatyn</li> <li>• Rhyl</li> <li>• Ruthin</li> <li>• St Asaph</li> </ul>
Local centre	Settlements providing a more limited range of medical, education, medical, financial and retail services than the main centre. Settlements with a local role in delivery of services and facilities for surrounding settlements and the open countryside.	<ul style="list-style-type: none"> <li>• Bodelwyddan</li> <li>• Corwen</li> <li>• Dyserth</li> <li>• Meliden</li> <li>• Rhuddlan</li> </ul>
Village	Smaller settlements with limited services providing services and facilities to sustain local needs.	<ul style="list-style-type: none"> <li>• Bodfari</li> <li>• Carrog</li> <li>• Cynwyd</li> <li>• Eryrys</li> <li>• Gellifor</li> <li>• Llandegla</li> <li>• Llandrillo</li> <li>• Pwllglas</li> <li>• Trefnant</li> <li>• Llanarmon yn Ial</li> <li>• Llanbedr Dyffryn Clwyd</li> <li>• Llanfair Dyffryn Clwyd</li> <li>• Pentre Llanrhaeadr</li> <li>• Bryneglwys</li> <li>• Clawddnewydd</li> <li>• Gwyddelwern</li> <li>• Glyndyfrdwy</li> <li>• Graianrhyd</li> <li>• Henllan</li> <li>• Llandyrnog</li> <li>• Llanferres</li> <li>• Tremeirchion</li> </ul>
Unserviced village	Small settlements with few or no services and facilities.	<ul style="list-style-type: none"> <li>• Aberwheeler</li> <li>• Betws Gwerfil Goch</li> <li>• Clocaenog</li> <li>• Pant Pastynog</li> <li>• Y Green</li> <li>• Cwm</li> <li>• Maeshafn</li> <li>• Rhewl</li> <li>• Cyffylliog</li> <li>• Graigfechan</li> <li>• Nantglyn</li> <li>• Rhualt</li> </ul>
Open countryside	All other unclassified settlements.	