

PLANNING, DESIGN AND ACCESS STATEMENT

Land at Upper Denbigh Road, St Asaph

Prepared on behalf of

The Applicant – Castle Green Homes

September 2021

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1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Castle Green Homes (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”) submitted to Denbighshire County Council for the development of Land at Upper Denbigh Road in St Asaph (hereafter referred to as the “Site”).
- 1.3. The description of development for which planning permission is sought comprises the following:

“Proposed residential development on Land at Upper Denbigh Road, St Asaph”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement as documented in *Table 1* below:

Table 1: Application Package

Technical Report	Author	Reference / Date
Location Plan	Castle Green Homes	UDP-STA-LP01
Proposed Site Plan	Castle Green Homes	UPD-STA-SP01 Rev. D
House Types	Castle Green Homes	Various
Sub-Station	SP Energy Networks	SP2022244 Rev. 5
Topographical Survey	SurveyEng Ltd	CGH.TS.06 Rev. A
Landscape Layout	Ascerta	P.1521.21.03
Transport Assessment	SCP	September 2021
Arboricultural Impact Assessment	Ascerta	September 2021
Flood Consequences Assessment and Drainage Strategy	Coopers Consulting Engineers	September 2021
Geophysical Investigations	Clwyd Powys Archaeological Trust	September 2021
Preliminary Ecological Appraisal and Great Crested Newt eDNA Survey Report	CES Ecology	September 2021

- 1.5. To inform this Application, the Applicant has engaged in informal discussions with Officers at Denbighshire County Council regarding the Site’s development potential, prior to its submission.

- 1.6. Furthermore, and in accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation for the proposed 'major' development (by virtue of its scale in excess of ten dwellings).
- 1.7. To guide this process, the Applicant has established a dedicated website on which to make details of the proposed development and the aforementioned Application documentation available to view <https://planning.castlegreenhomes.uk>. In accordance with the statutory guidelines, the Applicant has also issued formal correspondence to consultees and adjoining landowners, and advertised/displayed detailed of the Application by way of a site notice. Further details, including the feedback/comments received and how these have been addressed by the Applicant, will be documented in the Pre-Application Consultation Report to be submitted with the Application.

2 SITE CONTEXT

- 2.1. This Section of the Statement provides details of the Site, namely its location, description, and locational sustainability.

Site Location

- 2.2. The Site lies within the administrative area of Denbighshire County Council.
- 2.3. An aerial photo of the Site and its surroundings is provided at *Figure 1* below:

Figure 1: Aerial Photo of the Site as Existing



Source: Google Earth

- 2.4. The Site is located at the south-eastern corner edge of the City of St Asaph, which is identified as one of the Lower Growth Towns in Denbighshire County in the Council's Local Development Plan. St Asaph lies c. 1.7km south of Junction 27a of the A55 trunk road, the key route corridor in North Wales. It has a population of around 3,355 people.
- 2.5. In respect of its surroundings, the land to the east, west and south of the Site is largely agricultural in nature, separated from it by existing road infrastructure/farm access roads (including Upper Denbigh Road to the west). Furthermore, there is an established hedgerow boundary around the majority of the Site (save for part of the southern boundary).
- 2.6. The land to the north of the Site comprises existing buildings associated with the St Kentigern Hospice and Palliative Care Centre, and the Welsh Ambulance NHS Trust Headquarters, whilst beyond that lies the land previously occupied by the former HM Stanley Hospital. The latter now benefits from detailed planning and listed building consent for the development of the following:
- **Application Ref.'s 46/2015/0114/PF and 46/2015/0115/LB** - 46 no. dwellings, including alterations to a listed building, together with a 75 unit apartment assisted living facility and associated roads, sewers and open space
- 2.7. This adjoining, consented development is now under construction.
- 2.8. The two parcels of land which effectively form the Site are separated in part by Ty Tyn Farm and its associated buildings, located centrally within the Site (to be retained).

Site Description

- 2.9. The net Site area extends to 3.6 hectares (gross 4.89 hectares). It comprises greenfield land used for grazing purposes.
- 2.10. Vehicular access to the Site is currently available via the private farm access (serving Ty Tyn Farm and associated buildings) via the southern boundary to the Site. The existing Farm will be retained as part of the proposed development (the plot area of which extends to 0.13 hectares), albeit some outbuildings will be demolished. Future access into the Site will be provided via the creation of a new access from Upper Denbigh Road designed to adoptable standards. This section of Upper Denbigh Road lies within the already established 30mph zone with street lighting.
- 2.11. The profile of the land rises c. 5m from west to east (towards the centre of the Site) on a gradual basis (it is not a steep increase). The topography of the Site has been taken into account in the preparation of the Proposed Site Plan.
- 2.12. The Site lies wholly within Flood Zone A and thus is deemed to be at low risk of flooding.

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- 2.13. The Site is not located within a Conservation Area.
- 2.14. The nearest heritage asset to the Site is the former HM Stanley Hospital to the north, which is Grade II listed. As documented earlier in this Statement, that now benefits from planning and listed building consent for new build development and the conversion of the listed building. There will remain a physical and visual separation between the northern-most boundary of the Site and the listed building post-development (owing to development on the adjoining northern land), and it is not considered that the development of the Site would harm the setting and significance of the heritage asset.
- 2.15. The Site is not subject to any statutory or special designations relating to landscape value and nature conservation.
- 2.16. There is limited tree coverage across the western part of the Site. The Site boundaries currently comprise hedgerows and a small number of trees. There are no Tree Preservation Orders on the Site.
- 2.17. There is no existing footpath along the Site frontage on Upper Denbigh Road. However, the proposed new Site access will comprise 2m footways to connect to the existing footway network to the north (which is the direction that the majority of people will travel for local services). There is an existing Public Right of Way along the eastern boundary of the Site, and the Proposed Site Plan illustrates a potential connection to this from the Site.
- 2.18. To the south of the Site, outside of the Site boundary, is an existing pylon and overhead powerlines. An acceptable stand-off has been applied to this.

Locational Sustainability

- 2.19. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services. Further details are provided in Section 5 of the accompanying Transport Assessment

Access to Education

- 2.20. The nearest Primary School to the Site is St Asaph Infant School located a c. 0.8km walking distance north on Upper Denbigh Road. A footpath connection from the Site linking to the existing footpath on Upper Denbigh Road is proposed as part of this Application in order to provide for safe pedestrian movements to and from the Site to the School and the wider area.
- 2.21. The nearest Secondary School to the Site is Ysgol Uwchradd Glan Clwyd, again located on Upper Denbigh Road within a c. 0.6km walking distance of the Site.

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- 2.22. Overall, the Site benefits from excellent access to primary and secondary education, and which is accessible via sustainable modes of travel.

Access to Shops and Services

- 2.23. There are a number of shops and services available to the residents of St Asaph within the City. This includes a large convenience store, clothing shops, post office/cash facilities pharmacies and hair salons, restaurants/take-aways, public houses and places of worship amongst others (including St Asaph Cathedral).
- 2.24. These facilities are accessible on foot, cycle, and via public transport.
- 2.25. The nearest petrol filling station can be found off J27 of the A55.
- 2.26. Overall, the Site benefits from good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

- 2.27. The nearest bus stop to the Site is located immediately to the north on Upper Denbigh Road, approximately 190ft from the Site. This serves bus route 51 MAX and 51B providing access to locations including Denbigh and Rhyl. Further bus stops are located south on Upper Denbigh Road, within a short walk from the Site, served by the number 51 MAX, 51B, 52 and 54 services with 2 services per hour in either direction.
- 2.28. There is no railway station in St Asaph; the nearest railway station to the town is Rhyl, a c. 10.6km distance from the Site. This provides frequent services throughout the week to locations including Holyhead, Birmingham International, Shrewsbury, Manchester Airport and Llandudno.
- 2.29. Further details of public transport services can be found in Section 5 of the accompanying Transport Assessment.

Access to Healthcare

- 2.30. There are existing medical centres/GP practices and dental surgeries in St Asaph to provide healthcare services to local residents.

Access to Leisure / Recreation

- 2.31. Denbigh Leisure Centre lies c 0.6km north of the Site located on Upper Denbigh Road. This provides access to a fitness suite, sports hall, gymnasium, 3G pitch; squash courts and grass pitches.
- 2.32. The nearest existing equipped area of play to the Site can be found off Llys Dyffryn, within a short c. 400m walking distance (to the west of Upper Denbigh Road). Notwithstanding this, a Local Equipped Area of Play forms part of the proposed development.
- 2.33. Within the wider area, St Asaph is also home to a bowling club and cricket club.
- 2.34. Overall, the Site enjoys excellent access to leisure and recreation facilities within walking distance, and which together offer a significant health and well-being benefit to future residents of the proposed development.

Summary

- 2.35. Overall, the Site benefits from excellent sustainability as confirmed in Section 5 of the accompanying Transport Assessment. Its allocation for residential use in the adopted Denbighshire Local Development Plan, as documented later in Section 5 of this Statement, is a further demonstration of its suitability and sustainability for the proposed land-use and scale of development proposed as part of this Application.

3 PLANNING HISTORY

- 3.1. There is no planning history of relevance to the proposed development nor the Site which serves as a material planning consideration in the determination of this Application.
- 3.2. Details of the planning permission granted on the site of the former HM Stanley Hospital located to the north of the Site are provided in Section 2 of this Statement.

4 PROPOSED DEVELOPMENT

- 4.1. This Section of the Statement provides details of the proposed development for which detailed planning permission is now sought.

Use

- 4.2. This Application seeks detailed planning permission for the following:

“Proposed residential development on Land at Upper Denbigh Road, St Asaph”

Amount

- 4.3. The proposed development will comprise the development of 124 no. dwellings (Use Class C3), including 12 no. affordable homes (10%). There will be a sub-station located to the rear of Plot 14 and opposite Plot 15, details of which are shown on Drawing Ref. SP2022244 Rev. 5 submitted for approval. Some of the existing agricultural buildings associated with Ty Tyn Farm will be demolished.

Housing Mix, Density and Floorspace

- 4.4. The proposed development will comprise the following housing mix:
- 4 no. 1-bed walk-up apartments (ground and first floor) (Affordable Homes);
 - 6 no. 2-bed end and mid terraced properties;(Affordable Homes);
 - 2 no. 3-bed end terraced properties (Affordable Homes);

 - 29 no. 2-bed end and mid terraced properties (Open Market Homes);
 - 6 no. 3-bed end terraced properties (Open Market Homes);
 - 46 no. 3-bed detached properties (Open Market Homes);
 - 31 no. 4-bed detached properties (Open Market Homes).
- 4.5. The affordable housing shall be provided on the following plots, as shown on Drawing Ref. UPD-STA-SP01 Rev. D:
- Plots 54-56;
 - Plots 70-74; and
 - Plots 116-119,

- 4.6. The proposed net density across the Site will be 34.43 dwellings per hectare.
- 4.7. The cumulative net floorspace across the Site will equate to 3,407.61 square metres per hectare.

Scale and Massing

- 4.8. The proposed dwellings will all be a maximum of two-storeys in height, reflective of the prevailing local character on the consented land to the north, and existing development to the west of Upper Denbigh Road.
- 4.9. The proposed mix of dwellings (as set out in paragraph 4.4 above) allows for a layout such that it does not create issues of massing which would be out-of-keeping with the local character.

Layout

- 4.10. The Proposed Site plan is shown on *Figure 2* below.

Figure 2: Proposed Site Plan



- 4.11. The Proposed Site Plan has been designed as a natural and logical extension to the town at its south-eastern corner, adjacent to the redevelopment of the former HM Stanley Hospital site and existing hospice/ambulance headquarters. It has had regard to the guidance contained in the Development Brief for the Site and the five Design Objectives set out within it.
- 4.12. The Proposed Site Plan has taken account of the topographical changes across the land, such that all of the proposed dwellings will be no more than 2-storeys in height.
- 4.13. Plots 1-5 and 25-29 will positively address the Site frontage on to Upper Denbigh Road (served via a private drive off the new internal access road), whilst Plots 20-24 also positively address the proposed Site entrance (by fronting on to the internal access road).
- 4.14. The layout has been designed to provide for the efficient use of the land to deliver 124 new homes, with private gardens backing on to the Site's eastern, northern and southern boundaries. In order to protect the amenity and privacy of the residents of St Kentigern Hospice, the Proposed Site Plan has created a permanent landscaped buffer between the proposed development and the Hospice (extending to 0.13 hectares); this will not be available for public use.
- 4.15. There is some use of private driveways throughout the Site, with no more than 5 dwellings being served by any one private drive.
- 4.16. The affordable homes have been pepper-potted throughout the proposed development, and these properties will be indistinguishable in their appearance from the open market homes.
- 4.17. The house and plot sizes are reflective of the local character, incorporating a mix of terraced, semi-detached and detached properties alongside 4 no. apartments.
- 4.18. The layout has respected the Council's required separation distances and has sought to avoid any issues of overlooking/loss of privacy consistent with the Council's spacing standards. This includes the St Kentigern Hospice to the north of the Site as well as Ty Tyn Farm.
- 4.19. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This include overlooking of the proposed Local Equipped Area of Play from plots 29, 30, 123 and 124. Details of the street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.
- 4.20. The layout has sought to retain as many existing trees and hedgerows as possible, consistent with the Local Development Plan and Development Brief. However, in order to accommodate the proposed development, including the proposed Site access, a small number of trees and hedgerows (partial loss) will need to be removed. Further details are provided in Section 6 of this Statement.

The loss of these trees will be compensated for through replacement planting as shown on the submitted Landscape Plans.

Materials and House Types

4.21. *Figure 3* below provides examples of the proposed house types to be delivered across the Site, of which there are a total of 16 combinations; further details, including floorplans, are provided as part of the submitted drawing package.

Figure 3: Proposed House Types



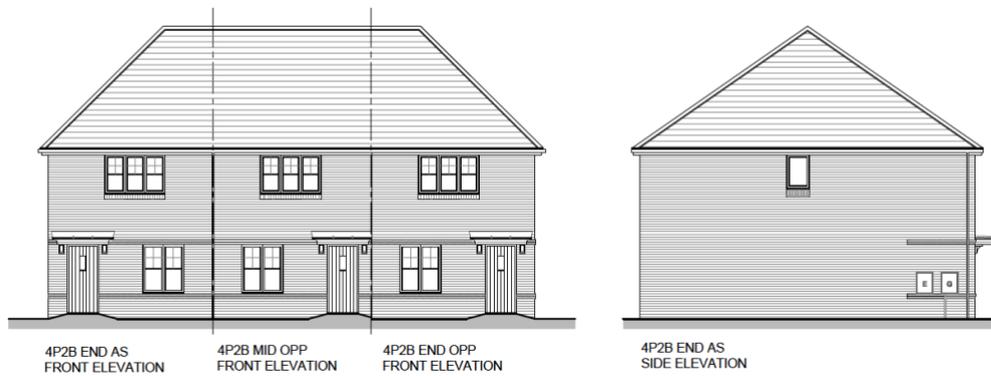
House Type: 2P1B – Walk-Up Ground Floor and First Floor Flats



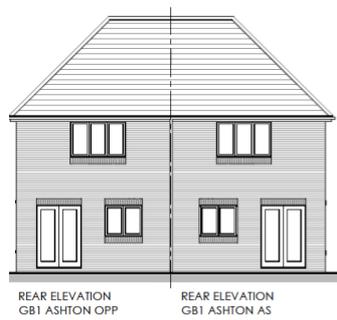
House Type: 5P3B and 4P2B



House Type: 4P2B, 4P2B and 5P3B



House Type: 4P2B x 3 Block – End/Mid Terrace



House Type: Ashton



House Type: 6P4B – Ashton / Oakley



House Type: *Highfield / Oakley*



House Type: *Oakley / Highfield*



House Type: *Marlow*



House Type: *Henley*



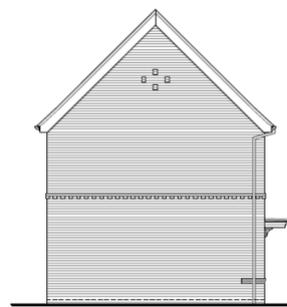
FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

House Type: *Henley Alternative*



FRONT ELEVATION



SIDE ELEVATION



REAR ELEVATION



SIDE ELEVATION

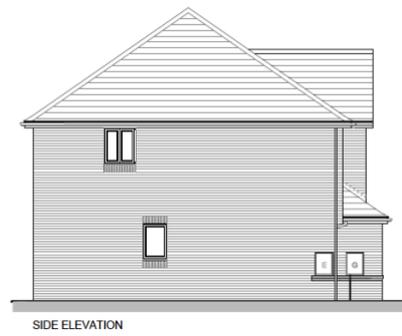
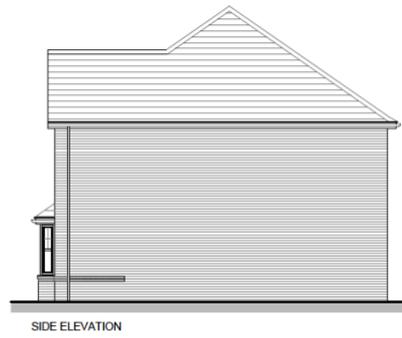
House Type: *Stratford*



House Type: *Beaumont*



House Type: *Heatherington*



House Type: *Wentworth*



House Type: *Alderton*



House Type: *Wiltshire*



House Type: *Sandringham*

- 4.22. The palette of materials proposed by the Applicant comprise facing brickwork with contrasting details and some render. Roof materials will likely include the use of slate-coloured concrete tiles. The palette of materials has been carefully considered with a view to ensuring a high-quality design which responds to the design objectives set out in the Development Brief for the Site prepared by Denbighshire County Council.
- 4.23. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

- 4.24. Landscape plans have been prepared and are submitted with the Application; these seek to provide new and compensatory tree and hedgerow planting across the Site. This will include native woodland and scrub planting, mixed native hedgerow, ornamental planting, as well as turfed private gardens.
- 4.25. As documented earlier in this Statement, a Local Equipped Area of Play will be provided within the western part of the Site. Other smaller pockets of amenity space will be provided throughout the Site, as shown on Drawing Ref. P.1521.21.03 submitted as part of the Application, and which in total will extend across 0.79 hectares of the Site.
- 4.26. The proposed boundary treatments include 1.8m high timber close boarded fences between properties, as well as a 1.8m high screen wall/fences between some of the plots as delineated on the submitted Proposed Site Plan.

Accessibility

- 4.27. Vehicular (and pedestrian/cycle) access into the Site will be created from Upper Denbigh Road. This will serve as the only point of access into the Site. The visibility splays at the proposed Site access will be 2.4m x 90m as shown on Drawing Ref. SCP/210584/F01 provided at Appendix E of the accompanying Transport Assessment.
- 4.28. The proposed access will include a 5.5m carriageway with a 2m internal footway on both sides of the road. The internal footways provided at the Site entrance will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement. This includes a connecting to the existing footway network on Upper Denbigh Road, providing a safe and traffic free link to local Schools and services, including public transport.

- 4.29. The road widths, including the features junction and private driveways, have been designed such that the proposed development is accessible via refuse vehicles and emergency vehicles. Swept path analysis has been undertaken to inform the proposed Site layout, details of which can be found in Section 4 of the accompanying Transport Assessment (and to ensure continued safe access for agricultural vehicles to Ty Tyn Farm).
- 4.30. The use of dropped kerbs and tactile paving will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all.
- 4.31. The proposed development will comprise a mix of side and front off-road parking consistent with the Council's standards set out in SPGN3. Some of the proposed housetypes will also benefit from integrated garage space.
- 4.32. There is the potential to create a footpath connection to the Public Right of Way along the eastern boundary of the Site, as shown on the Proposed Site Plan.
- 4.33. The proposed development and house types have taken account of the Council's guidance, and will ensure access for people of all abilities, as well as the safe movements of pedestrians and cyclists.

Waste and Recycling

- 4.34. Each of the proposed dwellings will have its own private bin storage area to aid waste collection and recycling.
- 4.35. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Assessment to ensure that the internal road system can accommodate the safe manoeuvring of refuse vehicles. This has demonstrated that a refuse vehicle can enter and leave the Site in a forward gear.

Drainage

- 4.36. The proposed development will incorporate the following drainage measures, as documented in the accompanying Flood Consequences Assessment and Drainage Strategy:
- **Surface Water** – the infiltration test undertaken as part of the site investigation report have determined that the underlying soils have potentially low infiltration characteristics across the Site. Therefore, surface water run-off from highways, roof and private drives will not discharge into the ground via infiltration techniques. Accordingly, all surface water will be collected into gravity piped networks, stored in a temporary SUDS basin and will discharge at a restricted rate into the highway drain in Upper Denbigh Road at restricted flow rates. The provision of trapped highway gullies, the SUDS detention basin and additional source

control components will provide adequate treatment for surface water flows prior to discharge to the watercourse; and

- **Foul Water** – as part of the pre-planning enquiry process, Welsh Water have advised that foul flows can be accommodated within the 300mm diameter gravity combined public sewer in Upper Denbigh Road to the north of the Site. Topography and proposed site levels design will allow for a gravity network to serve the entire proposed development without any need for a pumping station.

Environmental Sustainability

- 4.37. The proposed development has the potential to generate sustainability benefits. The sustainable location of the Site and the availability of alternative modes of transport, together with the pedestrian and cycle permeability offered within the Site, should encourage non-car travel. Likewise, the new tree and hedgerow landscaping to be delivered as part of the proposed development has the potential to make a positive contribution to the biodiversity value of the Site over time.
- 4.38. As a long-established North Wales housebuilder, the Applicant promotes energy efficiency within their homes; indeed, on average these are six times more efficient and generate over 60% fewer carbon emissions than older properties. As a commitment to energy efficiency, features include efficient heating systems, double glazing, insulated flooring, and a high standard of roof and wall insulation.

5 PLANNING POLICY CONTEXT

- 5.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 11 (“PPW11”) published in February 2021.
- 5.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

Local Development Plan

- 5.4. The development plan for the purposes of this Application comprises the following:
 - Denbighshire Local Development Plan covering the period 2006 to 2021 (adopted in 2013);
 - Denbighshire Local Development Plan Proposals Map.
- 5.5. On the Local Development Plan Proposals Map, the Site is designated as shown on Figure 4 below:
 - **Policy BSC1** – Part of Housing Allocation for 201 dwellings (Ref. Additional Land at HM Stanley)
 - **Policy RD1** – Settlement Boundary

Table 3: Relevant Local Development Plan Policies

Policy Reference	Policy Title
BSC1	Growth Strategy for Denbighshire
BSC3	Securing Infrastructure Contributions from Development
BSC4	Affordable Housing
BSC11	Recreation and Open Space
RD1	Sustainable Development and Good Standard Design
RD5	The Welsh Language and Social and Cultural Fabric of Communities
VOE1	Key Areas of Importance
VOE5	Conservation of Natural Resources
VOE6	Water Management
ASAS3	Parking Standards

Emerging Local Development Plan

- 5.7. Denbighshire County Council is currently in the process of preparing its new Local Development Plan. To date it has consulted on its Preferred Strategy as part of its Pre-Deposit stage consultation.
- 5.8. Consultation on the Deposit version of the emerging Local Development Plan has been delayed owing to the Covid-19 pandemic, and the Council will be updating its Delivery Agreement in due course.
- 5.9. Given that the emerging Local Development Plan remains in its infancy, it attracts limited weight in the determination of this Application.

Planning Policy Wales 11

- 5.10. PPW11 is a material consideration in planning decisions. PPW11 sets out the Welsh Government's approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental* and *cultural well-being* of Wales, and proposals should seek to promote sustainable development.
- 5.11. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.
- 5.12. Within PPW11, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.

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- 5.13. Placemaking features strongly within PPW11, identified as a holistic approach to the planning and design of development and spaces. This encourages high-quality development, with major developments creating new places.
- 5.14. Chapter 3 of PPW11 identifies the need to encourage and support the use of the Welsh language. Development proposals should consider the likely impact on the Welsh language and is a material planning consideration. It also seeks to protect the best and most versatile agricultural land unless there is an overriding need for its development.
- 5.15. Chapters 3 and 4 of PPW11 look at locational sustainability. New development should be accessible by walking and cycling, and well-served by public transport, as alternatives to the private car. New development should be located such that it minimises the need to travel and reduces dependency on the private car.
- 5.16. Chapter 4 of PPW11 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council's Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing delivery in each Authority area. Accurate information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review. Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.
- 5.17. Planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable. Paragraph 4.2.25 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.18. Chapter 6 requires development proposals to take account of the wildlife or landscape value of an area (including safeguarding protected species), and states that it is important to balance conservation objectives with the wider economic needs or local businesses and communities. Landscape value is identified as an intrinsic part of PPW11, and consideration should be given at the outset to any landscape value such that the wellbeing needs can be achieved. The provision of green infrastructure is encouraged, and the quality of the built environment should be enhanced by integrating green infrastructure into new development.
- 5.19. Chapter 6 also covers matters relating to flood-risk and drainage. PPW11 is clear that new development should reduce and not increase the risk of flooding; to this end, Local Planning

Authorities are encouraged to work closely with Natural Resources Wales, drainage bodies, sewerage undertakers and relevant authorities in the determination of planning applications. This process should ensure that surface water run-off is controlled as near to the source as possible through the use of sustainable urban drainage systems ("SUDS"), ensuring that development does not increase flooding elsewhere by the loss of flood storage/flood flow route, or increase the problem of surface water run-off. Paragraph 6.6.17 requires that development of one or more dwellings also require approval from the SuDS Approval Body ("SAB") before construction can commence. This is designed to ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

Technical Advice Notes (TAN)

5.20. Alongside PPW11, a number of Technical Advice Notes ("TAN") have been prepared by the Welsh Government. Those of relevance to the determination of this Application comprise the following:

- TAN2 – Planning and Affordable Housing
- TAN5 – Nature Conservation and Planning
- TAN11 - Noise
- TAN12 – Design
- TAN15 – Development and Flood Risk
- TAN16 – Recreation and Open Space
- TAN18 – Transport
- TAN20 – Planning and the Welsh Language
- TAN24 – The Historic Environment

Other Material Planning Considerations / Evidence Base Documents

5.21. Denbighshire County Council has published a number of other material planning considerations and evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

Housing Land Supply

5.22. The Council's latest Joint Housing Land Availability Study published in June 2019 accepts that it is unable to demonstrate a 5-year housing land supply. Having regard to the guidance contained in TAN1 (paragraph 8.2) at the time of its preparation, the housing land supply in Denbighshire County was adjudged to be 1.55 years and the requirements of Paragraph 4.2.15 of PPW11 were not met.

- 5.23. Since the publication of this Study, TAN1 has now been revoked by the Welsh Government and with it the requirement for Local Planning Authorities to prepare a Joint Housing Land Availability Study. Nevertheless, the Council's latest Annual Monitoring Report (AMR) published in 2020 clearly illustrates the significant housing delivery pressures across the County, and the fact that housing needs have continuously failed to be met since 2010/11 (and in each year since the Local Development Plan was adopted in 2013). In 2019/20, only 242 new homes were built against a minimum annual requirement for 500 dwellings year, without adjustment (which would increase the figure to 700+ dwellings per year taking account of previous under-delivery).
- 5.24. Within the AMR, the allocated land shown on Figure 4 of this Statement (Additional Land at HM Stanley) was forecast to deliver 201 homes after 2025+. Accordingly, the early delivery of 124 dwellings as part of this Application will positively boost the housing supply position in Denbighshire.

Local Housing Market Assessment (LHMA)

- 5.25. The Council's most recent LHMA Update was published in July 2019. St Asaph is identified as lying within the Bodelwyddan and Borders Local Housing Market Area (LHMA03).
- 5.26. Within this Area, the LHMA identifies a requirement for predominantly 1 and 2 bedroom social rented properties (Chart 9), with some lesser demand for 3-bedroom properties; and, 2 and 3 bedroom intermediate/rent to buy properties (Chart 10). Across the County there is identified to be an annual requirement for 155 affordable homes per annum (social and intermediate housing need).

Local Planning Guidance Notes

- 5.27. Denbighshire County Council has published the following Supplementary Planning Guidance Notes ("SPGN") which are considered relevant in the determination of this Application:
- SPGN – Access for All
 - SPGN – Affordable Housing
 - SPGN – Conservation and Enhancement of Biodiversity
 - SPGN – Parking Requirements in New Developments
 - SPGN – Planning Obligations
 - SPGN – Planning and the Welsh Language
 - SPGN – Recreational Open Space
 - SPGN – Residential Development
 - SPGN – Residential Design Guide
 - SPGN – Residential Space Standards
 - SPGN – Trees and Landscaping

➤ SPGN – Listed Buildings

5.28. Compliance of the proposed development with these SPGNs is considered in Section 6 of this Statement.

5.29. In addition to the above, there is a Site Development Brief "*Land at HM Stanley Hospital, St Asaph*" that was published by the Council in March 2016. The key points/requirements to note from the Development Brief are as follows;

- The Development Brief is a material planning consideration in the determination of any planning application on the Site;
- The Site is located in the settlement boundary of St. Asaph;
- The principle of housing development on the Site is established, subject to the acceptability of design details;
- Development of the Site should aim to raise the standards of design in terms of the built environment and in securing the best environment through landscape design;
- The development of the Site should include a buffer zone around the adjoining hospice site which is likely to impact on the total number of units it is possible to accommodate on the Site;
- Infrastructure requirements will be expected consistent with Policy BSC3 of the Local Development Plan, and which may include contributions towards local education;
- 10% affordable housing will be required, consistent with Policy BSC4 of the Local Development Plan;
- Open space provision should be provided on-site, at a rate of 72 square metres per dwelling (48 square metres for recreation/sport space, and 24 square metres for equipped play space and informal space). This should be well linked to public rights of way;
- A Community and Linguistic Impact Assessment will be required as part of this Application;
- The proposed development of the Site should respect and where possible enhance built heritage assets;
- The proposed development should protect and enhance the natural environment;
- Water conservation and measures to eliminate surface water run-off from the Site should be incorporated into the proposed development where practicable;
- Development proposals for the Site should ensure connection to the surrounding footpaths, footway and Public Rights of Way;
- Appropriate levels of car parking should be provided, consistent with Policy ASA3 of the Local Development Plan. A Transport Assessment is also required as part of this Application;

- A series of other detailed considerations are required as part of the proposed development, including:
 - Ecological surveys of the Site should be undertaken, including an Extended Phase 1 Survey which covers the existing activity on the Site (including trees);
 - The incorporation of walking and cycling routes should be a feature of any development proposal in order to provide good access throughout the Site and externally;
 - A desk-based archaeological assessment should be submitted as part of a planning application;
 - The design of the proposed development should integrate with the adjoining development of the former HM Stanley Hospital site and conversion;
 - Development should ensure overlooking of public spaces and avoid blank wall elevations facing onto public realm;
 - The use of SuDS should be considered alongside other design solutions;
 - There are five design objectives for the Site which the proposed development should meet.

5.30. Compliance of the proposed development with the material planning considerations is considered in Section 6 of this Statement.

6 TECHNICAL AND POLICY ASSESSMENT

- 6.1. This Section of the Statement assesses the proposed development against the relevant policies of the development plan, and other material considerations, as documented in Section 5.

Principle of Development

- 6.2. As documented in Section 5 of this Statement, the Site is allocated for residential use under Policy BSC1 of the Local Development Plan, forming part of the Additional Land at HM Stanley allocation (which in total is for 201 dwellings). It lies within the development boundary of St Asaph under Policy RD1.
- 6.3. The proposed development will it make a valuable and much-needed contribution to the market and affordable housing shortfall in Denbighshire against the requirement set out within the Local Development Plan (7,500 dwellings between 2006 and 2021); as set out in Section 5 of this Statement, there has been a considerable year on year under-supply of housing in Denbighshire since 2010/11 and this needs to be urgently addressed through positive decision-taking in relation to sustainable housing schemes. The revocation of TAN1 does not remove the requirement for Local Planning Authorities to meet their housing requirement; as a housing allocation, the Site can help to achieve this, with it being deliverable in its entirety within 36 months from a grant of detailed planning permission. This means that the Site will also come forward earlier than forecast by the Council as part of its AMR (which identified the Site as coming forward in 2025+).
- 6.4. The proposed development will provide for the efficient use of the land whilst delivering a mix of house types which respond to local housing needs, delivering predominantly a range of 1 to 3 bedroom homes. It will not lead to unsustainable and harmful development.
- 6.5. Accordingly, the principle of residential development on the Site is established and supported by Local Development Plan Policies BSC1 and RD1, and the Development Brief published by Denbighshire County Council.

Housing Mix, Affordable Housing and Density

- 6.6. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:
- 4 no. 1-bed walk-up apartments (ground and first floor) (Affordable Homes);
 - 6 no. 2-bed end and mid terraced properties;(Affordable Homes);
 - 2 no. 3-bed end terraced properties (Affordable Homes);

- 29 no. 2-bed end and mid terraced properties (Open Market Homes);
 - 6 no. 3-bed end terraced properties (Open Market Homes);
 - 46 no. 3-bed detached properties (Open Market Homes);
 - 31 no. 4-bed detached properties (Open Market Homes).
- 6.7. The proposed development will incorporate 12 affordable homes, equating to 10% of the total number of dwellings consistent with Policy BSC4 and the Development Brief. The affordable properties take the form of 1, 2 and 3 bedroom homes, responding to the housing needs identified in the LHMA. They will be pepper-potted throughout the Site and indistinguishable in appearance from the market homes. The provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW11.
- 6.8. The overall housing mix comprises 75% 1, 2 and 3 bedroom properties; this also aligns with the housing needs identified in the Council's LHMA. The mix of housing types and sizes responds to local needs.
- 6.9. The proposed net density across the Site will be 34.43 dwellings per hectare taking account of the Site's location, surroundings, configuration and wider policy requirements (including open space and landscaping/buffer). This also reflects the Site's allocation under Policy BSC1 of the Local Development Plan.
- 6.10. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1, BSC1 and BSC4, the Affordable Housing SPGN, the Development Brief, TAN2, and PPW11.

Layout and Design

- 6.11. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings (including the St Kentigern Hospice to the north), and technical and policy requirements including accessibility (road widths, visibility splays, pedestrian linkages), topography, impact on trees/hedgerows/ecology, impact on heritage assets, and privacy/amenity (for the residents of St Kentigern Hospice and Ty Tyn Farm). It has also been carefully shaped by the five design objectives set out paragraph 6.1 of the Development Brief.
- 6.12. This has informed the careful preparation of a Proposed Site Plan which will have limited impact on existing trees and hedgerows within and surrounding the Site. The layout maintains a permanent landscape buffer to St Kentigern Hospice to the north, whilst maintaining access to Ty Tyn Farm,

and facilitating a new access to the Public Right of Way along the eastern boundary (in addition to creating a safe new vehicular and pedestrian access on to Upper Denbigh Road). The creation of two-storey dwellings on the Site is considered appropriate having regard to the Site's surrounding context, the prevailing local character, and its physical characteristics. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards.

- 6.13. The house types, plot sizes and palette of materials have been designed to provide for the efficient use of land, whilst delivering high-quality accommodation and a high-quality living environment which raises the standard of design in the immediate locality but at the same time integrates with the consented residential development on the site of the former HM Stanley Hospital to the immediate north (through scale, design, massing and materiality). The layout also provides for the natural surveillance of properties and public spaces/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents. There are no blank wall elevations onto public realm.
- 6.14. The proposed net density across the Site will be 34.43 dwellings per hectare, and this is considered to be acceptable taking account of the guidance contained in Policy RD1 which seeks a density of 35 dwellings per hectare, and the wider policy requirements to be met across the Site. This includes the guidance in paragraph 4.6 of the Site Development Brief, and the requirement for a landscape buffer to be provided around the St Kentigern Hospice. The Development Brief acknowledges that this in itself will impact on the density and dwelling numbers.
- 6.15. Each property is designed to allow for access by people of all abilities consistent with the Council's Access for All guidance.
- 6.16. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1 and BSC4, the Access for All and Residential Development and Space Standards SPGNs, the Development Brief (including the five design objectives), TAN12, and PPW11.

Trees and Hedgerows

- 6.17. An Arboricultural Impact Assessment (AIA) has been undertaken across the Site and is submitted with the Application. This is consistent with the requirements of the Site Development Brief.
- 6.18. The proposed development has sought to retain existing tree and hedgerow planting, as well as providing compensatory/additional soft landscaping, consistent with the requirements of the Development Brief.

6.19. In doing so, it has been established that the following trees and hedgerows will need to be removed from the Site to accommodate the proposed development:

- H1 in part (Category C2);
- T6 (Category B2/C2);
- T10 (Category C2);
- T11 (Category B2);
- T18 (Category B1);
- H2 (Category C2);
- T21 (Category C2);
- H3 in part (Category C2); and
- G3 (Category B2/C2).

6.20. In addition to the above, the AIA has assessed the potential for the proposed development to impact on other retained trees and hedgerows. This includes a number of additional trees/groups of trees as listed in Table 1 of the AIA, owing to issues relating to the removal of hardstanding, the provision of new hard surfaces, the construction of new buildings, pruning requirements, and indirect physical impacts.

6.21. Tree protection measures are proposed to minimise/mitigate the impact of the proposed development on these species, namely tree protection fencing to be erected prior to the commencement of development. Such measures can be secured through a Arboricultural Method Statement which can be secured by way of planning condition.

6.22. Accordingly, and based on the recommendations of the Assessment, the proposed development is considered to be consistent with Local Development Plan Policies RD1 and VOE5, the Trees and Landscaping SPGN, the Development Brief, TAN5, and PPW11.

Landscaping and Public Open Space

6.23. As documented in Section 4 of this Statement, landscape plans have been prepared and are submitted with the Application; these set out the Applicant's intentions to provide new and compensatory tree and hedgerow planting across the Site. They also provide details of the proposed boundary treatments within and at the perimeter of the Site.

6.24. As set out above, existing trees and hedgerows are only proposed to be removed where they are required in order to secure vehicular and pedestrian connections, and to facilitate the proposed development as whole (including new hard surfaces and built form).

- 6.25. Moreover, and as documented in Section 4 of this Statement, the proposed development will comprise a Local Equipped Area of Play extending to c. 400 square metres, together with other amenity space which in total extends to 0.79 hectares. This will be accessible to all residents of the proposed development. Each of the properties will also benefit from its own private outdoor garden space. The total amount of public open space on the site is consistent with the requirements set out under Policy BSC11 of the Local Development Plan, exclusive of the landscape buffer which is not intended to be used as amenity space by the public. The public open space and Local Equipped Area of Play will be accessible via the proposed public footpath network within the Site, offering the potential for health and well-being benefits.
- 6.26. Details relating to the maintenance of the public open spaces can be secured by way of a planning obligation.
- 6.27. The landscape buffer between plots 39-49/Ty Tyn Farm and St Kentigern Hospice to the north will extend to 0.13 hectares, with a potential maintenance access to this area allowed for as shown on the Proposed Site Plan.
- 6.28. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1 and BSC11, the Recreational and Open Space SPGN, the Development Brief, TAN16, and PPW11.

Highways and Road Safety

- 6.29. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for through the creation of a new access from Upper Denbigh Road, designed to adoptable standards.
- 6.30. The proposed arrangements, including road and footpath widths, as described in Section 4 of this Statement are considered to be acceptable and will facilitate safe movements by vehicles (include refuge), pedestrians and cyclists of all abilities into and out of the Site, and through it, as well as providing safe connectivity to public spaces in the immediate surroundings.
- 6.31. In respect of car parking provision within the Site, the standards which have been applied by the Applicant are consistent with those set out by the Council in its Parking Requirements in New Developments SPGN.
- 6.32. The Transport Assessment submitted with the Application has assessed the potential impacts of the proposed development on the highway network and road safety, the scope of which has previously been agreed with the Council's Highways Department. This has assessed three junctions; a) the proposed site access along the A525 Upper Denbigh Road; b) the A525 High

Street/A525 Upper Denbigh Road/Mount Road/Chester Street priority-controlled roundabout; and c) A525 High Street/A525 The Roe/Lower Denbigh Road priority-controlled roundabout. The assessment has also taken account of existing committed residential development on adjoining land. The full conclusions of this exercise are set out in Section 8 of the accompanying Transport Assessment; however, in summary, it has been assessed that the proposed development will not have a material impact on the existing highway network and junction capacity/operations.

- 6.33. In terms of trip generation, it has been established within Section 7 of the accompanying Transport Assessment that the proposed development will generate the following:
- 14 vehicle arrivals, and 39 vehicle departures from the Site during the weekday AM peak hour; and
 - 36 vehicle arrivals and 17 vehicle departures from the Site during the weekday PM peak hour.
- 6.34. As above, this proposed increase in traffic is not anticipated to have a material impact on the operation or safety of the local highway network. As such, there are no highway or transport related reasons to withhold planning permission for the proposed development.
- 6.35. As a condition of any planning permission, the Applicant is willing to accept the requirement to submit a Construction and Environmental Management Plan, and which will include details of construction traffic, site compound, contractor parking, and construction hours amongst others.
- 6.36. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1 and ASAS3, the Access for All and Parking Requirements in New Developments SPGNs, the Development Brief, TAN18, and PPW11.

Landscape and Visual Impact

- 6.37. The Site is not subject to any protected landscape designations and does not sit within an Area of Outstanding Natural Beauty. The acceptability of housing development on the Site is reflected through its housing allocation in the Denbighshire Local Development Plan.
- 6.38. Notwithstanding the above, the development of a greenfield parcel of land for housing will inevitably change the characteristics of the Site and the views into and out of it. However, the Proposed Site Plan has sought to provide for a layout which offers a natural transition to the countryside beyond to the south and east (by rear gardens backing on to these boundaries) whilst at the same time providing for the efficient use of land and addressing wider planning policy considerations. To this end, the proposed development of this allocated housing site for 124 no. dwellings, of no more than 2-storey in height, is not considered to cause unacceptable landscape and visual harm.

6.39. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies BSC4 and VOE1, the Development Brief, TAN24 and PPW11.

Nature Conservation

6.40. A Preliminary Ecological Appraisal (PEA) has been undertaken across the Site. In doing so, this has identified the following:

- The Site is not designated with any statutory or non-statutory designations for nature conservation. It lies over 3km from the nearest SAC and SSSI and does not contain any woodland or habitat connections to the Site; it is considered unlikely that the proposed development would adversely affect the status of these important sites as they are not functionally linked;
- The closest non-statutory site to the Site is Coed Fron and Eryl Hall Wood LWS, located c. 0.6km to the west; it is designated for its Ancient Woodland. Given the physical separation and distance between the Site and the LWS, it is considered unlikely that the proposed development would adversely affect the status of the site;
- Hedgerows H1 and H2 could potentially qualify as important under the Wildlife and Landscape criteria of the Hedgerow Regulations 1997. These have been assessed as part of the AIA;
- No evidence of badger was recorded on or within 30m of the Site, although two badger latrines were identified. It is therefore likely that the Site is used for foraging, and some loss will occur as a result of the proposed development. However, given the availability of other suitable habitat in the wider area, the effect of the proposed development on the wider badger population is likely to be low. Reasonable Avoidance Measures should be applied for the protection of badgers;
- There are no records of Barn Owl activity on the Site. The on-site trees within the hedgerows do not offer suitable nesting opportunities for barn owl, although there will be the loss of some foraging habitat. No further survey work is required;
- No bat roosts were noted on the Site or within adjacent land parcels. However, some of the trees proposed to be removed were identified as possessing suitable features for roosting bats. Accordingly, it is recommended that aerial inspections of some trees be undertaken in line with the recommendations set out in the PEA. The existing agricultural buildings proposed to be demolished were identified as having negligible potential for roosting bats. The provision of bat boxes is recommended, alongside the retention of existing linear features where possible, and a sensitive lighting scheme;
- All wooded vegetation on the Site has the potential to support nesting birds, including hedgerows and trees. The retention of hedgerows and trees will help to reduce the potential impacts of the proposed development on breeding birds. The Applicant is willing to accept

a planning condition requiring bird nest boxes to be provided across the Site which will also achieve a net gain in biodiversity, as well as controls over the removal of vegetation from the Site outside of the core nesting bird season (generally March to August);

- The hedgerows and grassland habitats on the Site were considered to offer hedgehog with suitable foraging and shelter habitat. Development on the Site has the potential to impact upon hedgehogs. Accordingly, protective measures as outlined in the PEA should be applied during both the construction and post-construction phases;
- A single pond is present on the Site; a Habitat Suitability Index Assessment has therefore been duly undertaken. This identified the categorisation of the pond as 'good.' Consequently, an eDNA Survey of the pond has been undertaken as per the recommendations in the PEA. Whilst the findings of this Survey were negative, it is recommended that a further Survey be undertaken between April-June 2022 to verify these results;
- No invasive species have been identified on the Site; and
- It is unlikely that the Site is supporting invertebrates or other reptiles. Nevertheless, it is recommended that a reptile presence/likely absence survey be undertaken in respect of the proposed development to establish the status of reptiles on the Site.

6.41. Accordingly, and subject to following recommendations set out in the Survey, the proposed development is considered to be consistent with Local Development Plan Policies RD1 and VOE5, the Conservation and Enhancement of Biodiversity SPGN, the Development Brief, TAN5, and PPW11. Based on the PEA and the survey data available at the time of submission, it is not likely to have a negative and harmful impact on protected species, albeit noting the recommendations for further survey work.

Heritage

6.42. Given the existing and retained permanent physical and visual separation between the Site and the Grade II listed HM Stanley Hospital to the north of the Site, in the post-development scenario the proposed development would not cause any harm to the setting and significance of this designated heritage asset.

6.43. Accordingly, the proposed development is considered to be consistent with Local Development Plan Policies RD1 and VOE1, the Listed Buildings SPGN, the Development Brief, TAN23, and PPW11.

Archaeology

6.44. In order to establish the geophysical conditions of the Site, a Geophysical Investigation has been undertaken and is submitted as part of the Application. In summary, this has identified no significant archaeological features across the two areas that were surveyed; it is concluded within the

Investigation that the linear features present in the LiDAR data are more likely attributed to modern and historic agricultural activity across the Site.

- 6.45. Accordingly, it is considered that the proposed development will respond positively to and is consistent with Local Development Plan Policy RD1 and VOE1, the Development Brief, TAN23 and PPW11.

Flood-Risk and Drainage

- 6.46. As documented in Section 2 of this Statement, the Site lies in Flood Zone A. It is therefore deemed by Natural Resources Wales to be at a low risk of surface water, groundwater, fluvial and tidal flooding, as confirmed in the accompanying Flood Consequences Assessment and Drainage Strategy. The Site is also at low risk of flooding from artificial sources (reservoirs/canals/sewers).
- 6.47. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application (as set out in the accompanying Flood Consequences Report and Drainage Strategy). This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement.
- 6.48. Accordingly, and subject to the recommendations set out in the Assessment in relation to further porosity testing, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policy VOE6, the Development Brief, TAN15 and PPW11.

Planning Conditions

- 6.49. As outlined within this Statement, the Applicant is willing to accept a number of planning conditions related to the proposed development where these satisfy the six tests set out in the Welsh Government Circular published in October 2014 and WGC 016/2014. These include:
- Drainage (surface water and foul water);
 - Materials;
 - Affordable Housing;
 - Construction and Environmental Management Plan;
 - Phase 2 Site Investigations;
 - Tree protection measures (as per Arboricultural Method Statement);
 - Reasonable avoidance measures;
 - Bird Nesting and Bat Boxes; and
 - Lighting.

Planning Obligations

- 6.50. The Applicant is committed to engaging in discussions with Officers at Denbighshire County Council in relation to securing planning obligations where these satisfy the requirements of LDP Policy BSC3, SPGN – Planning Obligations, the Development Brief, and Regulation 122 of the Community Infrastructure Levy Regulations which require that:
- The obligations must be necessary to make the proposed development acceptable in planning terms;
 - The obligation must be directly related to the proposed development; and
 - The obligations must be fairly and reasonably related in scale and kind to the proposed development.
- 6.51. Any requests for financial contributions consistent with the aforementioned policy tests must be justified by up-to-date evidence.

7 CASE FOR DEVELOPMENT

7.1. Having regard to the Technical Assessment in Section 6 of this Statement, this Section goes on to consider the proposed development in the context of the overarching objectives of sustainable development as documented in paragraph 2.28 of PPW11.

Social Benefits

7.2. The proposed development will deliver the following **Social** benefits:

- The delivery of 124 new dwellings in Denbighshire where there is an accepted shortfall in housing land supply and an overriding need for new homes. The proposed development will involve the development of an allocated housing site within the defined settlement boundary of St Asaph, the principle of which is both established and supported;
- The delivery of 12 no. affordable homes, 10% of the proposed development, and which is a material planning consideration. These will comprise 1, 2 and 3 bedroom homes reflecting the findings of the LHMA and which will be accessible by local people; and
- The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the guidance contained in the Development Brief, the Council's SPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW11.

Economic Benefits

7.3. The proposed development will deliver the following **Economic** benefits:

- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;
- Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;
- Annual Council Tax contributions to Denbighshire County Council from the 124 no. proposed new dwellings; and

- Gross Value Added to the local economy generated by future residents of the proposed development.

Environmental Benefits

7.4. The proposed development will deliver the following **Environmental** benefits:

- Existing trees and hedgerows within and at the perimeter of the Site will be retained wherever possible. Landscaping, including new tree and hedgerow planting across the Site, provides the opportunity to achieve secure net gains in biodiversity whilst at the same time minimising the landscape and visual impacts of the proposed development;
- The proposed development is not likely to give cause to the loss of any features of significant ecological value, nor cause harm to any protected species, albeit further survey work is recommended;
- The proposed surface water drainage measures which will not increase or exacerbate flood-risk or surface water run-off elsewhere;
- The creation of safe and adoptable access arrangements from Upper Denbigh Road, and which will facilitate and encourage safe pedestrian and cycle movements;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling, provided for through new and safe linkages, consistent with the guidance criteria set out in Section 5 of the accompanying Transport Statement. Where the use of the private car is required, the proposed development will have a negligible impact on the highway network and road safety;
- The proposed development will not have any adverse impact on the historic environment, including the former Grade II listed HM Stanley Hospital;
- The proposed development will not have an adverse on the historic environment, nor create any adverse impacts in relation to noise, contamination and air quality/odour; and

- Construction of energy efficient homes using established techniques which the Applicant applies to all of its new-build properties.

Cultural Well-Being

7.5. The proposed development will deliver the following **Cultural** benefits:

- The Applicant recognises that the proposed development presents the opportunity for an overall positive community and linguistic impact. To this end, and if deemed necessary, they are agreeable to the provision of bilingual signage within the proposed development amongst other measures such that the proposed development has the potential for a positive community and linguistic impact;
- The proposed development will not cause harm to any existing heritage assets nor assets of cultural significance; and
- There is no evidence to suggest or support any view that the proposed development cannot be integrated within the settlement, and nor that it would impact on the safety and cohesion of the community. The Site is allocated under Policy BSC1 of the Local Development Plan, and its suitability for residential development is both established and supported.

8 CONCLUSIONS

- 8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land at Upper Denbigh Road, St Asaph.
- 8.2. The description of development for which detailed planning permission is sought is:
- “Proposed residential development on Land at Upper Denbigh Road, St Asaph”***
- 8.3. This Statement has demonstrated that the proposed development is consistent with relevant policies contained within the Local Development Plan as well as other material considerations. The Site is allocated for residential use and lies within the defined settlement boundary of St Asaph.
- 8.4. The principle of residential development on the Site is supported through its housing allocation under Policy BSC1 and location within the defined settlement boundary. The proposed development will represent a logical extension to the City at its south-eastern corner, delivering a balanced mix of much-needed, high-quality new market and affordable housing which provides for the efficient and sustainable use of the land.
- 8.5. In respect of the technical considerations assessed in Section 6 of this Statement, the proposed development will not give cause to any negative adverse impacts. It satisfies the key policy and technical requirements set out in the LDP and other material considerations including the Council's SPGN's and the Development Brief, and national planning policy contained in the Technical Advice Notes and PPW11.
- 8.6. As set out in Section 7 of this Statement, the proposed development will generate a number of economic, social, environmental and cultural well-being benefits consistent with the overarching objectives set out in PPW11.
- 8.7. In the overall planning balance, the proposed sustainable development is considered to be acceptable; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with Policy RD1 of the Local Development Plan, the Development Brief, and paragraph 1.18 of PPW11.

