

PLANNING, DESIGN AND ACCESS STATEMENT

Former Welsh Ambulance Service Centre, Upper Denbigh Road,
St Asaph

Prepared on behalf of

The Applicant – Castle Green Homes

February 2023

 **Address:**

5 Portal Business Park, Eaton Lane,
Tarpoley, Cheshire, CW6 9DL

 **Telephone:**

07506 279 147

 **Email:**

enquiries@grimsterplanning.co.uk

CONTENTS

Section Number	Section Title	Page Number
1	INTRODUCTION	1
2	SITE CONTEXT	3
3	PLANNING HISTORY	8
4	PROPOSED DEVELOPMENT	9
5	PLANNING POLICY CONTEXT	20
6	TECHNICAL AND POLICY ASSESSMENT	27
7	CASE FOR DEVELOPMENT	41
8	CONCLUSIONS	44
APPENDICES		
1	APPROVED LAYOUT FOR APPLICATION REF 46/2015/0114/PF (LAND TO NORTH OF THE SITE)	
2	APPROVED LAYOUT FOR APPLICATION REF 46/2022/0841 (LAND TO SOUTH OF THE SITE)	

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 redevelopment of the Former Welsh Ambulance Service Centre off 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:

“Erection of 28 no. dwellings, landscaping and associated works (Phase 3)”

- 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-LP02
Proposed Site Plan	Castle Green Homes	UPD-STA-SP01 Rev. O
House Types	Castle Green Homes	Various
Topographical Survey	SurveyEng Ltd	CGH.TS.06 Rev. A
Landscape Layout and Planting Plans	Ascerta	P.1766.23.03A P.1766.23.04A
Transport Statement	SCP	January 2023
Arboricultural Impact Assessment	Ascerta	October 2022
Flood Consequences Assessment and Drainage Strategy Drawing Ref. 7866/SK111	Coopers Consulting Engineers	November 2022
Preliminary Ecological Appraisal	Cheshire Ecological Services	January 2023
Bat and Bird Box Scheme	Cheshire Ecological Services	January 2023

- 1.5. To inform this Application, the Applicant has engaged in informal discussions with Officers at Denbighshire County Council regarding the timing of the Application and its relationship with the consented land to the south of the Site under development by the Applicant.

- 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, together with the Site Location Plan (site boundary):

Figure 1: Aerial Photo of the Site as Existing and Site Location Plan



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 is largely agricultural in nature beyond the established hedgerow. The land to the north of the Site comprises that previously occupied by the former HM Stanley Hospital. The St Kentigern Hospice and Palliative Care Centre lies to the immediate west. The land to the south is agriculture in nature, and is allocated for housing in the adopted Denbighshire LDP.

- 2.6. The land to the north and south of the Site, as referenced above, now benefits from the following extant planning permissions:
- **Application Ref.'s 46/2015/0114/PF and 46/2015/0115/LB** – on the land to the immediate north, planning permission and listed building consent has been granted for the development of 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. This development is under construction by Pure Residential; and
 - **Application Ref. 46/2021/1161 and 46/2022/0841** – on the land to the immediate south, planning permission has been granted for the development of 113 no. dwellings and associated works. This scheme is under construction by the Applicant, Castle Green Homes.
- 2.7. The proposed development would serve as an extension to the scheme approved under Application Ref.'s 46/2021/1161 and 46/2022/0841. It should be noted that these extant planning permissions will be subject to a separate Section 73 application to amend the approved road alignment and housing mix, as a result.
- 2.8. The land to the immediate west of the Site, occupied by St Kentigern Hospice and Palliative Care Centre, will continue remain in that active use.

Site Description

- 2.9. The net Site area extends to 0.66 hectares (gross 0.72 hectares). It comprises single storey office and storage buildings formerly occupied and used as the headquarters of the Welsh Ambulance Service. The land and buildings are now vacant and have been since 2019, as documented further in Section 6 of this Statement.
- 2.10. Vehicular and pedestrian access to the Site is currently available off Upper Denbigh Road using the access to the former HM Stanley Hospital, and via an internal road network. This section of Upper Denbigh Road lies within the already established 30mph zone with street lighting.
- 2.11. The Site is relatively flat in nature and there are no topographical constraints to its redevelopment.
- 2.12. The Site lies wholly within Flood Zone A and thus is deemed to be at low risk of flooding.
- 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-west of the Site, 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. Taking account of the approved layout for Application Ref. 46/2015/0114/PF at **Appendix 1** of this Statement, 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 on the Site, saves for a few trees along the eastern edge. There are no known Tree Preservation Orders covering the Site.

Locational Sustainability

- 2.17. 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 4 of the accompanying Transport Statement:

Access to Education

- 2.18. The nearest Primary School to the Site is St Asaph Infant School located a c. 0.8km walking distance north on Upper Denbigh Road. As part of the proposed development, the Site would connect to the approved footpaths on the consented land to the immediate south under Application Ref.'s 46/2021/1161 and 46/2022/0841, which in turn link to the existing footpath on Upper Denbigh Road in order to provide for safe pedestrian movements to and from the Site to the School and the wider area.
- 2.19. 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.
- 2.20. 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

- 2.21. 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).
- 2.22. These facilities are accessible on foot, cycle, and via public transport.

-
- 2.23. The nearest petrol filling station can be found off J27 of the A55.
- 2.24. Overall, the Site benefits from good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

- 2.25. The nearest bus stop to the Site is located immediately to the west on Upper Denbigh Road, approximately 300m from the Site boundary. 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.
- 2.26. 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.
- 2.27. Further details of public transport services can be found in Section 4 of the accompanying Transport Statement.

Access to Healthcare

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

Access to Leisure / Recreation

- 2.29. 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.
- 2.30. The nearest existing equipped area of play to the Site can be found off Llys Dyffryn, within a short c. 600m walking distance (to the west of Upper Denbigh Road). Notwithstanding this, a Local Equipped Area of Play is to be delivered as part of the consented residential development under construction by the Applicant on the land to the immediate south of the Site and which will be accessible by any future residents of the Site.
- 2.31. Within the wider area, St Asaph is also home to a bowling club and cricket club.

2.32. 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

2.33. Overall, the Site benefits from excellent sustainability as confirmed in Section 4 of the accompanying Transport Statement. It's suitability as a location for residential development has previously been accepted through the extant residential planning permissions granted on the land to the immediate north and south of the Site as documented earlier in this Statement.

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 extant residential planning permissions granted on the land to the immediate north and south of the Site are documented 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:

“Erection of 28 no. dwellings, landscaping and associated works (Phase 3)”

- 4.3. All of the existing buildings and structures on the Site would be demolished and cleared.

Amount

- 4.4. The proposed development will comprise the development of 28 no. dwellings (Use Class C3), including 3 no. affordable homes (10%).
- 4.5. It should be noted that the Applicant is progressing plans to submit a separate Section 73 Application on the adjacent consented land (Application Ref. 's 46/2021/1161 and 46/2022/0841) to amend the approved plans. This would reduce the number of dwellings to 112 on the adjacent land (with Plot 98 of the consented scheme instead now forming part of this Application instead). As such, there would only be a net increase of 27 no. dwellings (despite 28 no. dwellings being applied for). Hence, 140 no. dwellings in total would cumulatively be delivered across the two sites.

Housing Mix, Density and Floorspace

- 4.6. The proposed development will comprise the following housing mix:

Affordable Housing

- 2 no. 2-bed end and mid terraced properties;(Affordable Homes); and
- 1 no. 3-bed end terraced property (Affordable Home).

Open Market Housing

- 8 no. 2-bed end and mid terraced properties (Open Market Homes);
- 14 no. 3-bed detached properties (Open Market Homes);
- 3 no. 4-bed detached properties (Open Market Homes).

4.7. The affordable housing shall be provided on the following plots, as shown on Drawing Ref. UPD-STA-SP01 Rev. O:

- Plots 118-120 (taking account of the wider Site comprising the land to the south).

4.8. The proposed net density across the Site will be 42.19 dwellings per hectare for the 28 no. dwellings in isolation. However, when combined with the consented land to the south already subject to planning permission ref. 's 46/2021/1161 and 46/2022/0841, this reduces to 34.35 dwellings per hectare; the latter figure is considered to be the more appropriate figure to take into consideration given that the proposed development would represent a continuation of the already approved scheme utilising the same access arrangements from Upper Denbigh Road.

4.9. The cumulative floorspace arising from the proposed development subject to this Application would equate to 26,535 square feet.

Scale and Massing

4.10. 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 south, and existing development to the west of Upper Denbigh Road.

4.11. The proposed mix of dwellings (as set out in paragraph 4.6 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

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

Figure 2: Proposed Site Plan



- 4.13. 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, consented housing development to the south, and St Kentigern Hospice.
- 4.14. The Proposed Site Plan has taken account of the Site's physical surroundings, such that all of the proposed dwellings will be no more than 2-storeys in height.
- 4.15. The layout has been designed such that all plots will positively address the Site frontage where possible, taking account of the Site configuration and plot efficiency.

- 4.16. The layout has been designed to provide for the efficient use of the land to deliver an extra 27 new homes (net), with private gardens backing on to the Site's western and northern boundaries. This will protect the residential amenity of the approved housing on the land to the north of the Site, and the residents of St Kentigern Hospice and Palliative Care Centre to the immediate west of the Site. Furthermore, the Proposed Site Plan has created a permanent landscaped buffer along the western boundary between the proposed development and the Hospice (extending to 0.11 hectares); this will not be available for public use.
- 4.17. There is some use of private driveways throughout the Site, with no more than 5 dwellings being served by any one private drive.
- 4.18. The affordable homes are located to the north-west corner of the Site, and these properties will be indistinguishable in their appearance from the open market homes.
- 4.19. The house and plot sizes are reflective of the local character and the adjoining land already subject to planning permission for housing, incorporating a mix of semi-detached and detached properties alongside a row of mid and end terrace properties for the affordable units.
- 4.20. 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 and Palliative Care Centre to the west of the Site, and approved residential development to the north, east and south of the Site taking account of the approved layouts contained in Appendices 1 and 2 of this Statement.
- 4.21. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments.
- 4.22. The layout has sought to retain as many existing trees and hedgerows as possible, consistent with the Local Development Plan. However, in order to accommodate the proposed development, including the proposed Site access, a very small number of trees and hedgerows 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 Layout and Planting Plans.

Materials and House Types

- 4.23. *Figure 3* below provides examples of the proposed house types to be delivered across the Site; further details, including floorplans, are provided as part of the submitted drawing package.

Figure 3: Proposed House Types



House Type: 4P2B, 4P2B and 5P3B



House Type: Ashton Elevations



House Type: *Highfield / Oakley Elevations*



House Type: *Highfield Semi Elevations*



House Type: *Stratford Elevations*



House Type: *Cheltenham Elevations*



House Type: *Wentworth Elevations*



House Type: *Alderton Elevations*

- 4.24. 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 and which is consistent with the already approved residential development to the south of the Site which is under construction by the Applicant.
- 4.25. 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

- 4.26. Landscape layout and planting 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.
- 4.27. The Site will not contain any public open space; instead, residents will be able to access the Local Equipped Area of Play and amenity space to be provided within the western part of the consented residential development to the south of the Site being delivered by the Applicant, accessible on foot via the proposed and consented footpath network.
- 4.28. 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 and Landscape Layout. New tree planting will be provided along the western boundary of the Site to serve as a buffer to St Kentigern Hospice and Palliative Care Centre, as shown on the submitted Landscape Layout, to protect residential amenity and privacy.

Accessibility

- 4.29. Vehicular (and pedestrian/cycle) access into the Site will be secured from Upper Denbigh Road, utilising the access arrangements approved under Application Ref.'s 46/2021/1161 and 46/2022/0841 on the land to the immediate south. This will serve as the only point of access into the Site, as a continuation of the approved access and internal road layout. The visibility splays at the proposed Site access will be 2.4m x 90m, and this access has already been implemented on the ground.
- 4.30. The access includes a 5.5m carriageway with a 2m internal footway on both sides of the road. The internal footways to be provided will facilitate 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 connecting to the existing footway

network on Upper Denbigh Road via the consented residential scheme to the south of the Site which is under the control of the Applicant, providing a safe and traffic free link to local Schools and services, including public transport.

- 4.31. 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 Appendix B of the accompanying Transport Statement.
- 4.32. 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.
- 4.33. The proposed development will comprise front off-road parking consistent with the Council's standards set out in SPGN – *Parking Requirements in New Developments*. Some of the proposed house types will also benefit from integrated garage space (namely the Stratford, Cheltenham, Alderton and Wentworth house types). The proposed house types provide an average of 2-3 spaces per unit in accordance with the Council's standards.
- 4.34. 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

- 4.35. Each of the proposed dwellings will have its own private bin storage area to aid waste collection and recycling.
- 4.36. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Statement 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

- 4.37. The proposed development will incorporate the following drainage measures, as documented in the accompanying Flood Consequences Assessment and Drainage Strategy, and Drawing Ref. 7866/SK111:
 - **Surface Water** – the surface water strategy presented in Appendix 1 of the Drainage Strategy provides attenuation within a SUDS basin at the end of the network with a hydro brake flow control device to restrict the flows. The incorporation of additional source control

SUDS components such as water butts, permeable paving and bio retention will be considered at a detailed design stage.

- **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

- 4.38. 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.
- 4.39. 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** – Growth Strategy for Denbighshire
 - **Policy BSC12** – Community Facilities
 - **Policy PSE2** – Land for Employment Uses
 - **Policy RD1** – Settlement Boundary

Figure 4: Local Development Plan Proposals Map Extract



Local Development Plan

- 5.6. In addition to those policies cited above, the following Local Development Plan policies are considered to be pertinent in the determination of this Application, and are considered further in Section 6 of this Statement:

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
PSE3	Protection of Employment Land and Buildings
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.
- 5.10. Guidance from Welsh Government published in a letter dated 24th September 2020 confirms that in the absence of an up-to-date LDP, plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.
- 5.11. This is the case in Denbighshire. Accordingly, the adopted LDP remains the development plan for the purposes of determining this planning application. The replacement LDP and its emerging evidence base carries limited weight.

Planning Policy Wales 11

- 5.12. 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.
- 5.13. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.
- 5.14. Within PPW11, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.

-
- 5.15. 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.
- 5.16. 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.
- 5.17. 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.
- 5.18. 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.
- 5.19. 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.
- 5.20. 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.
- 5.21. 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)

5.22. 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

5.23. 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

5.24. The Council’s last Joint Housing Land Availability Study (JHLAS) was published in 2019. This demonstrated a housing land supply position of 1.55 years. Following the revocation of TAN1 in March 2020, no further JHLAS have been published.

5.25. The housing requirement in Denbighshire County for the Plan period 2006-2021 equates to 7,500 dwellings, at an annual rate of 500 dwellings. This is set out under LDP Policy BSC1.

- 5.26. Based on the latest figures contained in paragraph 5.3 of the Council's 2022 LDP Annual Monitoring Report, housing delivery (completions) in Denbighshire between 2006 and 2021 equated to 3,104 dwellings, an average annual delivery rate of 207 dwellings per annum. This is a significant shortfall against the LDP requirement of 7,500 dwellings, and it also cites the failure of the Bodelwyddan Key Strategic Site to come forward.
- 5.27. The housing trajectory of actual and anticipated completions for the period 2018 – 2026 contained in Chart 1 of the Annual Monitoring Report also shows a considerable anticipated shortfall in housing delivery from 2023 onwards. Accordingly, there is clear evidenced need for new housing to come forward across the County.

Local Housing Market Assessment (LHMA)

- 5.28. The Council's most recent LHMA Update was published in July 2019.
- 5.29. Within it, St Asaph is identified as lying within the Bodelwyddan and Borders Local Housing Market Area (LHMA03). 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).
- 5.30. The LHMA provides some specific guidance at Table 24 in respect of the open market housing mix which it is *recommended* should be provided as part of new residential development schemes. These are set out below:
- **1 or 2 bedroom dwellings** – 30% of new developments
 - **3 bedroom dwellings** – 35% of new developments
 - **4 or more bedroom dwellings** – 35% of new developments
- 5.31. It is confirmed within the LHMA that this mix is based on an identified need for smaller properties in Denbighshire, hence the recommendation for 65% of homes to comprise 1-3 bedrooms.

Local Planning Guidance Notes

- 5.32. 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

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 subject to the following designations on the adopted LDP Policies Map:

- **Policy BSC1** – Growth Strategy for Denbighshire
- **Policy BSC12** – Community Facilities
- **Policy PSE2** – Land for Employment Uses
- **Policy RD1** – Settlement Boundary

- 6.3. We consider compliance with these various policies below where relevant:

Land for Employment Uses (Policy PSE2)

- 6.4. The Site was formerly in use as the headquarters of the Welsh Ambulance Service with associated storage. Accordingly, it would have operated primarily as offices/call centre for emergency services, rather than having served a commercial use. The building was thus adapted in order to serve the emergency services.
- 6.5. The Welsh Ambulance Service re-located to new premises on St Asaph Business Park in early 2019, providing for over 100 members of staff. The new facility serves as a base for operational ambulances crews as well as a training facility. This has replaced the land and buildings now subject to this Application which have since been decommissioned.
- 6.6. Accordingly, the land and building did not serve a B1 use in the strictest sense, and indeed the use of the land and building could be considered to constitute a Sui Generis use class. To this end, Policy PSE2 is not considered to be strictly applicable in the consideration of this Application, particularly as its redevelopment for housing will not result in the loss of any employment given the re-location of the former use to new, modern and fit-for-purpose premises within St Asaph to safeguard those very jobs.
- 6.7. Prior to the acquisition of the land by the Applicant (which is now owned freehold) the Site had been marketed by Legat Owen Chartered Surveyors from October 2021, with a deadline set for offer of 17th December 2021, at the instruction of the Welsh Ambulance Trust. A sales brochure was produced and distributed to Legat Owen's comprehensive buyer database together with the land

and building being listed on the Legat Owen website, EG Property Link, Zoopla and CoStar websites.

- 6.8. Three offers were received, all from residential developers. No offers were received for the property in its existing use, nor for any commercial or community use or development.
- 6.9. As outlined earlier in this Statement, the land and buildings are no longer in active use. Upon a physical assessment of the buildings, they are evidently no longer fit for purpose to meet modern-day employment needs. Significant capital investment would be needed to bring them up to modern-day standards. Furthermore, the change in working habits and the increased working from home flexibility following the Covid-19 pandemic has reduced the demand for such premises. The large-scale St Asaph Business Park lies within c. 3.6km of the Site via the A525 and Glascoed Road, and which already provides access to a range of employment opportunities for local people in modern, fit for purpose premises. To this end, the redevelopment of the Site for residential use would not prejudice the ability for St Asaph to meet its local employment need. It would also introduce a land-use which is wholly compatible and sympathetic with existing and consented land-uses on the surrounding land to the north, south, east and west. A non-residential use of the land could now be viewed as non-conforming with its surroundings (existing and consented).
- 6.10. Based on the latest figures contained on page 39 of the Council's 2022 LDP Annual Monitoring Report, there has been a loss of 8.51 hectares of employment land to other uses since 2013. Notwithstanding the earlier comments regarding the use class that the land and buildings have historically served, the change of use of 0.72 hectares of land to accommodate the proposed development would not have a harmful impact on non-residential land supply in the County nor people's ability to access employment. Indeed, of the original 113.17 hectares of all employment-related land available in 2013 (which now stands at 105.07 hectares), its redevelopment would constitute a change of use of just 0.68% of this supply.
- 6.11. As such, there is not considered to be any conflict with Policies PSE2 and PSE3 of the LDP.

[Housing Need in Denbighshire \(Policy BSC1 and RD1\)](#)

- 6.12. As shown on the adopted LDP Policies Map, the Site lies within the defined development boundary of St Asaph. Its redevelopment for housing would therefore constitute *windfall* development within the urban area.

Housing Land Supply and Historic Delivery

- 6.13. As documented in Section 5 of this Statement, the Council's last Joint Housing Land Availability Study (JHLAS) was published in 2019. This demonstrated a housing land supply position of 1.55 years. Following the revocation of TAN1 in March 2020, no further JHLAS have been published.
- 6.14. The housing requirement in Denbighshire County for the (now time-expired) Plan period 2006-2021 equates to 7,500 dwellings, at an annual rate of 500 dwellings. This is set out under LDP Policy BSC1.
- 6.15. Based on the latest figures contained in paragraph 5.3 of the Council's 2022 LDP Annual Monitoring Report, housing delivery (completions) in Denbighshire between 2006 and 2021 equated to 3,104 dwellings. This is a significant shortfall against the LDP requirement of 7,500 dwellings during the Plan period, which is now time-expired. Further details are provided in paragraph 5.25 and 5.26 of this Statement.
- 6.16. As set out in Section 5 of this Statement, the emerging Local Development Plan remains in its infancy and thus attracts limited weight in the determination of this Application. The reflects guidance from Welsh Government published in a letter dated 24th September 2020 which confirms that in the absence of an up-to-date LDP, plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.
- 6.17. This is the case in Denbighshire. Accordingly, the adopted LDP remains the development plan for the purposes of determining this Application and the consideration of housing needs. The replacement LDP and its emerging evidence base carries limited weight.

Future Housing Trajectory in Denbighshire - 2021 Onwards

- 6.18. The Pre-Deposit Preferred Strategy of the Council's Replacement LDP has identified a reduced annual requirement of 218 dwellings per annum; this represents a significant reduction versus the current adopted annual requirement of 500 (notwithstanding the upwards adjustment to take account of historic shortfall). However, given that the replacement LDP has not yet reached the Deposit Plan stage, let alone Examination in Public, it is not considered that it can carry any weight at this time.
- 6.19. Chart 1 contained in the 2022 LDP Annual Monitoring Report illustrates DCC's failure to meet the adopted LDP housing requirement in 2018, 2019, 2020 and 2021 (as has been the case historically). This trend is forecast to continue from 2022 to 2026, as shown below (Adopted LDP AAR is the adopted LDP Requirement):



6.20. Chart 1 also shows that DCC would be unable to meet the, as yet untested, replacement LDP requirement in any future years, **inclusive of** existing allocations (as documented in paragraph 6.5 of the same document) and a windfall allowance of 50 dwellings per annum (25 from large sites, 25 from small sites). Until such time that a Replacement LDP is adopted, there will continue to be a housing shortfall across the Borough, both market and affordable.

Windfall Allowance in Adopted LDP

6.21. In assessing the adopted LDP, the Local Plan Inspector’s considered the issue of windfall development in helping to meet the housing needs of the County

6.22. The following extracts have been taken from the Inspectors Report into the adopted LDP, published in April 2013:

Table 2

Source of Supply	Units
Bodelwyddan KSS	1,000
Other allocations	579
Villages	407
Urban potential sites	960
Small sites and conversions	505
Sites with planning permission	1,749
Completions	1,410
The 21 proposed allocations	1074
The 4 preferred sites	250
Total	7,934
Housing provision under Policy BSC1	7,500
Surplus	434

- 4.36 This would provide a contingency of around 5.5% which is less than the 10% usually considered to be necessary to provide the required level of flexibility. However, more or less may be appropriate depending on the circumstances. At the time EXAM0075 was written around 30% of supply was estimated to come from windfalls. As indicated above, the introduction of the additional allocations reduces that to 20%, thereby reducing reliance on this uncertain source of supply. The Council has shown that the allocations can be delivered and there is, therefore, greater confidence, in our view, that the LDP can deliver the number of houses required to meet the needs of the county. Consequently, we are satisfied that the adopted LDP would be flexible. However, the Council should be vigilant and be prepared to react quickly if monitoring shows that the housing target may not be met.

- 6.23. As can be seen above, an allowance of 20% of the County's future housing supply was to come from windfall sites. This was in addition to the housing allocations, not instead of. Overall, the housing supply position was to have a contingency of 434 units (over the requirement for 7,500 homes), equating to 5.5%. This itself was already below the 10% usually considered to be necessary, placing more pressure on the housing land supply in the County and the need for windfall sites to come forward for development.
- 6.24. The proposed development now subject to this Application would deliver windfall development in line with the expectations of the LDP Inspector.

Density of Development

- 6.25. The proposed net density across the Site will be 42.19 dwellings per hectare for the 28 no. dwellings in isolation. However, when combined with the consented land to the south already subject to planning permission ref. 's 46/2021/1161 and 46/2022/0841, this reduces to 34.35 dwellings per hectare. The density takes account of the Site's location, surroundings, configuration and wider

policy requirements (including open space and landscaping/buffer). This will therefore be broadly consistent with Part (ii) of Policy RD1 which seems a minimum density of 35 dwellings per hectare.

Summary

6.26. Taking account of the above, the proposed redevelopment of the Site for residential use is considered to be in compliance with Policies BSC1, PSE2, PSE3 and RD1 of the adopted LDP. The proposed development is assessed against the other components of Policy RD1 later in this Section.

Housing Mix, Affordable Housing and Density

6.27. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:

Affordable Housing

- 2 no. 2-bed end and mid terraced properties;(Affordable Homes); and
- 1 no. 3-bed end terraced property (Affordable Home).

Open Market Housing

- 8 no. 2-bed end and mid terraced properties (Open Market Homes);
- 14 no. 3-bed detached properties (Open Market Homes);
- 3 no. 4-bed detached properties (Open Market Homes).

6.28. As outlined above, the proposed development will incorporate 3 no. affordable homes (plots 118-120), equating to 10% of the total number of dwellings consistent with Local Development Plan Policy BSC4. These take the form of 2 and 3 bedroom properties, responding to housing needs identified in the Local Housing Market Assessment published by the Council in July 2019 (LHMA).

6.29. The design of the affordable homes will be 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.

6.30. As documented in Section 5 of this Statement, the LHMA provides some specific guidance at Table 24 in respect of the open market housing mix which it is *recommended* should be provided as part of new residential development schemes. These are set out below:

- **1 or 2 bedroom dwellings** – 30% of new developments

- **3 bedroom dwellings** – 35% of new developments

- **4 or more bedroom dwellings** – 35% of new developments

6.31. In terms of the percentage split of the proposed house sizes and tenures that will come forward on the Site (based on bedroom numbers), this shall comprise the following:

- 35.7% **2-bedroom properties**, in the form of end and mid terraced houses;

- 53.6% **3-bedroom properties** in the form of an end terraced and detached properties; and

- 10.7% **4-bedroom properties** in the form of detached properties.

6.32. The proposed open market housing mix on the Site will comprise that set out below. It should be noted that the percentages are a total of the overall number of open market houses that would be delivered on the Site, which currently stands at 28 no. dwellings (a net increase of 27 for the reasons set out in Section 4 of this Statement:

- **2 bedroom dwellings** – 32% of the proposed development, an exceedance of 2% against the LHMA guidance

- **3 bedroom dwellings** – 56% of the proposed development, an exceedance of 21% against the LHMA guidance; and

- **4 or more bedroom dwellings** – 12% of the proposed development, a shortfall of 23% against the LHMA guidance.

6.33. The proposed housing mix includes a larger percentage of 3-bedroom properties than recommended in the LHMA. However, this is considered to be reflective of market demand post the Covid-19 pandemic, with more people now seeking an extra bedroom in a 3-bedroom property to afford greater flexibility for home-working. The Covid-19 pandemic has had a significant impact on people's daily lives, perhaps most notably their working patterns and location. This is not something which was naturally factored into the LHMA when published, pre-pandemic, and thus is now something of a limitation of that particular evidence base.

6.34. The pandemic has triggered a significant shift in people's housing/accommodation needs, with the requirement for extra space from which to work at home now a new and important consideration. This includes additional space for a home office/study, which typically takes the form of an extra-bedroom. Accordingly, those people previously seeking a 2-bedroom property may now seek a three-

bedroom property, and so forth, subject to it being available and within their affordability range. It is therefore crucial that the housing market responds to these needs, both now and in the future. It is not considered to be 'good, positive planning' to simply focus on meeting historic needs, which no longer reflect the significant social changes which have now taken place in since the LHMA was produced. Such an approach would be counter-intuitive. The Applicant is therefore firmly of the view that the demand for more living space must be reflected in the housing mix which is presented as part of the proposed development.

- 6.35. Accordingly, the proposed housing mix and density of development set out earlier in this Statement is considered to respond positively to and is consistent with Local Development Plan Policies RD1, BSC1 and BSC4, the Affordable Housing SPGN, and PPW11.

Layout and Design

- 6.36. 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 west and former HM Stanley Hospital 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, Ty Tyn Farm and the consented residential dwellings to the north, east and south to be constructed in the future).
- 6.37. This has informed the careful preparation of a Proposed Site Plan which will have very limited impact on existing trees and hedgerows. The layout maintains a permanent landscape buffer to St Kentigern Hospice to the west to ensure privacy and to protect residential amenity. 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, including to future neighbouring residential dwellings based on the approved layouts contained in **Appendices 1 and 2** of this Statement.
- 6.38. 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 and east, and that to the south under construction by the Applicant (through scale, design, massing and materiality). The layout also provides for the natural surveillance of properties and public routes/pedestrian and cycle linkages within the Site from properties with a view to designing out crime and to ensure the well-being of residents.

- 6.39. As set out earlier in this Statement, the proposed net density across the Site will be 42.19 dwellings per hectare for the 28 no. dwellings in isolation. However, when combined with the consented land to the south already subject to planning permission ref. 's 46/2021/1161 and 46/2022/0841, this reduces to 34.35 dwellings per hectare. This is considered to be acceptable taking account of the guidance contained in Policy RD1 which seeks a minimum density of 35 dwellings per hectare.
- 6.40. Each property is designed to allow for access by people of all abilities consistent with the Council's Access for All guidance.
- 6.41. 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, TAN12, and PPW11.

Trees and Hedgerows

- 6.42. An Arboricultural Impact Assessment (AIA) has been undertaken across the Site and is submitted with the Application.
- 6.43. The proposed development has sought to retain existing tree and hedgerow planting, as well as providing compensatory/additional soft landscaping.
- 6.44. 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:
- T1 (Category U) – this tree is in poor condition and should be removed in any event due to its condition; and
 - G1 (Category C2).
- 6.45. 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 an Arboricultural Method Statement which can be secured by way of planning condition, if required, given that only one other group of trees (G2) will remain.
- 6.46. 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, TAN5, and PPW11.

Landscaping and Public Open Space

- 6.47. As documented in Section 4 of this Statement, landscape layout and planting 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.
- 6.48. As set out above, existing trees and hedgerows are only proposed to be removed where a) they are in poor condition, and b) 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).
- 6.49. As documented in Section 4 of this Statement, the Site will not contain any public open space; instead, residents will be able to access the Local Equipped Area of Play and amenity space to be provided within the western part of the consented residential development to the south of the Site, accessible on foot via the proposed and consented footpath network. This will provide the potential for health and well-being benefits.
- 6.50. The landscape buffer between plots 120-127 and St Kentigern Hospice to the west will extend to 0.17 hectares, with a potential maintenance access to this area to be agreed if required.
- 6.51. 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, TAN16, and PPW11.

Highways and Road Safety

- 6.52. As documented in Section 4 of this Statement, vehicular (and pedestrian/cycle) access to the Site will be provided for via the consented residential development to the immediate south of the Site under construction by the Applicant, off Upper Denbigh Road, designed to adoptable standards.
- 6.53. 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.
- 6.54. 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.

- 6.55. The Transport Statement submitted with the Application has assessed the potential impacts of the proposed development on the highway network and road safety. In terms of trip generation, it has been established within Section 5 of the accompanying Transport Assessment that the proposed development will generate 12 vehicle movements during the AM and PM peak hours. This equates to one additional vehicle movement every 5 minutes on the local highway network.
- 6.56. 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.
- 6.57. 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.
- 6.58. 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, TAN18, and PPW11.

Landscape and Visual Impact

- 6.59. The Site is not subject to any protected landscape designations and does not sit within an Area of Outstanding Natural Beauty. It is a brownfield parcel of land located within the defined settlement boundary of St Asaph comprising existing built form, and is surrounded on all sides by existing and consented development. Accordingly, its proposed redevelopment is not considered to cause unacceptable landscape and visual harm.
- 6.60. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies BSC4 and VOE1, TAN24 and PPW11.

Nature Conservation

- 6.61. 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;
- Buildings A and C on the Site, as shown in Appendix B of the PEA, were identified as having the potential to support bats. Presence/absence survey of the buildings will be required in the next active bat season, May to September, inclusive, in the form of 3 dusk emergence/dawn re-entry surveys;
- No evidence of bat activity was found in Buildings B, D and E, as shown in Appendix B of the PEA. However, presence/absence survey of the buildings will be required in the next active bat season, May to September, inclusive, in the form of at least 1 dusk emergence/dawn re-entry survey;
- 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 habitats on the Site do not offer suitable nesting opportunities for barn owl. No further survey work is required;
- 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);
- A single pond is present on the land to the south of the Site, which was assessed prior to the granting of planning permission on the adjacent land. This pond was found to be negative for Great Crested Newt DNA. The habitats within the Site now subject to this Application were identified as being suboptimal for Great Crested Newts given the lack of natural habitats. Whilst the presence of Great Crested Newts is therefore unlikely, as good practice the Reasonable Avoidance Measures implemented on the adjacent land should be followed;
- No invasive species have been identified on the Site; and
- It is unlikely that the Site is supporting invertebrates or other reptiles and no further survey work is required.

6.62. As part of this Application, the Applicant has submitted a Bat and Bird Box Scheme for approval as shown on Drawing Ref. CES/750/160/01-23/KM.

6.63. 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, 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 bat survey work.

Heritage

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

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

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

Flood-Risk and Drainage

6.67. 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).

6.68. 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 and Drawing Ref. 7866/SK111). This has identified the proposed surface water and foul water drainage solutions as set out in Section 4 of this Statement.

6.69. Accordingly, and subject to further detailed design secured by way of condition, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policy VOE6, TAN15 and PPW11.

Planning Conditions

6.70. 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;
- Tree protection measures (as per Arboricultural Method Statement);
- Landscape Planting;
- Reasonable avoidance measures;
- Bird Nesting and Bat Boxes; and
- Lighting.

Planning Obligations

6.71. 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, 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.

6.72. 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 28 no. new dwellings (a net increase of 27 for the reasons set out earlier in this Statement) 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 a brownfied site within the defined settlement boundary of St Asaph, as a windfall housing scheme. The loss of the existing land and buildings to a residential use will not have a harmful impact on non-residential land supply in the County;
- The delivery of 3 no. affordable homes, 10% of the proposed development, and which is a material planning consideration. These will comprise 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) is much more compatible with its neighbouring residential land-uses (existing and consented) and c) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area consistent with 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 28 no. (net 27) 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:

- 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. This includes the provision of a landscape buffer along the western boundary of the Site to protect the residential amenity and privacy of the residents of St Kentigern Hospice;
- 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 bat 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 via a continuation of the consented residential development to the immediate south of the Site under construction by the Applicant, 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 4 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 proposed redevelopment of the Site would represent a windfall development opportunity in the defined settlement boundary of St Asaph on a brownfield parcel of land.

8 CONCLUSIONS

8.1. This Statement has been prepared in support of a detailed planning application for the proposed development of the Former Ambulance Service Centre off Upper Denbigh Road, St Asaph.

8.2. The description of development for which detailed planning permission is sought is:

“Erection of 28 no. dwellings, landscaping and associated works (Phase 3)”

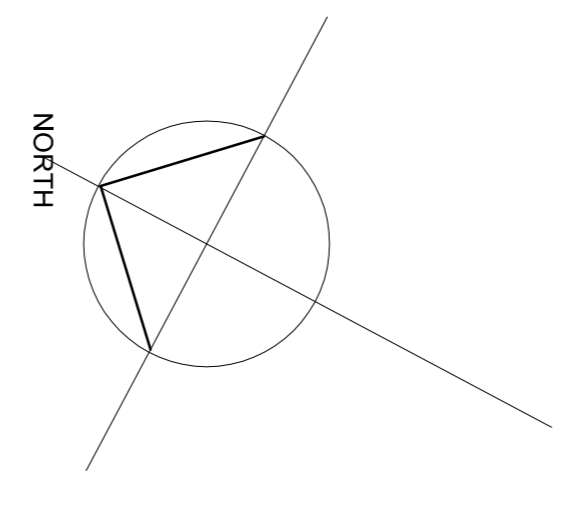
8.3. This Statement has demonstrated that the proposed development is consistent with relevant policies contained within the Local Development Plan as well as other material considerations. The Site comprises a brownfield parcel of land located within the defined settlement boundary of St Asaph.

8.4. The principle of residential development on the Site is considered to be justified for the reasons set out in Sections 6 and 7 of this Statement. The benefits associated with the development of the Site are considered to outweigh any harm arising from the loss of land and buildings formerly used for employment purposes, but which have been vacant since 2019 and are no longer fit-for-purpose to meet modern-day employment needs and expectations. The proposed development will deliver 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 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, and paragraph 1.18 of PPW11.



- REV NN 31 OCT 2016 LANDSCAPING UPDATED
- REV MM 28 OCT 2016 LANDSCAPING UPDATED
- REV LL 28 OCT 2016 LANDSCAPING UPDATED
- REV JJ 06 OCT 2015 ALE PLAN & PARKING UPDATED
- REV HH 22 SEPT 2015 ALE PLAN & PARKING UPDATED
- REV GG 21 SEPT 2015 ALE PLAN UPDATED
- REV FF 27 AUG 2015 ROAD LAYOUT UPDATED
- REV EE 13 AUG 2015 ROAD LAYOUT UPDATED
- REV DD 13 AUG 2015 ROAD LAYOUT UPDATED
- REV CC 28 MAY 2015 ROAD LAYOUT UPDATED
- REV BA 15 MAY 2015 ROAD LAYOUT & PARKING UPDATED
- REV Y 29 APR 2015 ROAD LAYOUT & PARKING UPDATED
- REV X 11 FEB 2015 WORKHOUSE & INFIRMARY UPDATED
- REV W 11 FEB 2015 WORKHOUSE & INFIRMARY UPDATED
- REV V 02 FEB 2015 LAYOUT UPDATED FOR FOS
- REV U 30 JAN 2015 LAYOUT UPDATED
- REV T 30 JAN 2015 LAYOUT UPDATED
- REV S 30 JAN 2015 LAYOUT UPDATED
- REV R 28 JAN 2015 LAYOUT UPDATED
- REV Q 28 JAN 2015 LAYOUT UPDATED
- REV N 25 JAN 2015 LAYOUT UPDATED
- REV M 21 JAN 2015 LAYOUT UPDATED
- REV K 16 JAN 2015 LAYOUT UPDATED
- REV J 14 JAN 2015 LAYOUT UPDATED
- REV I 12 JAN 2015 LAYOUT UPDATED
- REV H 07 JAN 2015 LAYOUT UPDATED
- REV G 30 DEC 2014 LAYOUT UPDATED
- REV F 18 DEC 2014 LAYOUT UPDATED
- REV A 11 DEC 2014 LAYOUT UPDATED

willacy horsewood partnership

client
PURE RESIDENTIAL AND COMMERCIAL LTD

job
PROPOSED RESTORATION OF H M STANLEY HOSPITAL BUILDINGS
AND NEW BUILD DEVELOPMENT

title
PROPOSED SITE PLAN

scale
1 : 500

date
NOV'14

job no.
WH1227

drawing no.
ST01

rev
NN

willacy horsewood partnership
mollington grange, parkgate road, cheser, CH1 6NP
www.willacyhorsewood.co.uk
Tel: 01244 853891 Fax: 01244 853892 E-Mail: info@willacyhorsewood.co.uk



SYMBOL	DESCRIPTION	NO.	UNIT	NO.	TOTAL
1	1 Bed 1 Storey Detached	571	SQFT	2	117
2	2 Bed 1 Storey Detached	84	SQFT	1	84
3	3 Bed 1 Storey Detached	40	SQFT	1	40
4	4 Bed 1 Storey Detached	10	SQFT	1	10
5	5 Bed 1 Storey Detached	10	SQFT	1	10
6	6 Bed 1 Storey Detached	10	SQFT	1	10
7	7 Bed 1 Storey Detached	10	SQFT	1	10
8	8 Bed 1 Storey Detached	10	SQFT	1	10
9	9 Bed 1 Storey Detached	10	SQFT	1	10
10	10 Bed 1 Storey Detached	10	SQFT	1	10
11	11 Bed 1 Storey Detached	10	SQFT	1	10
12	12 Bed 1 Storey Detached	10	SQFT	1	10
13	13 Bed 1 Storey Detached	10	SQFT	1	10
14	14 Bed 1 Storey Detached	10	SQFT	1	10
15	15 Bed 1 Storey Detached	10	SQFT	1	10
16	16 Bed 1 Storey Detached	10	SQFT	1	10
17	17 Bed 1 Storey Detached	10	SQFT	1	10
18	18 Bed 1 Storey Detached	10	SQFT	1	10
19	19 Bed 1 Storey Detached	10	SQFT	1	10
20	20 Bed 1 Storey Detached	10	SQFT	1	10
21	21 Bed 1 Storey Detached	10	SQFT	1	10
22	22 Bed 1 Storey Detached	10	SQFT	1	10
23	23 Bed 1 Storey Detached	10	SQFT	1	10
24	24 Bed 1 Storey Detached	10	SQFT	1	10
25	25 Bed 1 Storey Detached	10	SQFT	1	10
26	26 Bed 1 Storey Detached	10	SQFT	1	10
27	27 Bed 1 Storey Detached	10	SQFT	1	10
28	28 Bed 1 Storey Detached	10	SQFT	1	10
29	29 Bed 1 Storey Detached	10	SQFT	1	10
30	30 Bed 1 Storey Detached	10	SQFT	1	10
31	31 Bed 1 Storey Detached	10	SQFT	1	10
32	32 Bed 1 Storey Detached	10	SQFT	1	10
33	33 Bed 1 Storey Detached	10	SQFT	1	10
34	34 Bed 1 Storey Detached	10	SQFT	1	10
35	35 Bed 1 Storey Detached	10	SQFT	1	10
36	36 Bed 1 Storey Detached	10	SQFT	1	10
37	37 Bed 1 Storey Detached	10	SQFT	1	10
38	38 Bed 1 Storey Detached	10	SQFT	1	10
39	39 Bed 1 Storey Detached	10	SQFT	1	10
40	40 Bed 1 Storey Detached	10	SQFT	1	10
41	41 Bed 1 Storey Detached	10	SQFT	1	10
42	42 Bed 1 Storey Detached	10	SQFT	1	10
43	43 Bed 1 Storey Detached	10	SQFT	1	10
44	44 Bed 1 Storey Detached	10	SQFT	1	10
45	45 Bed 1 Storey Detached	10	SQFT	1	10
46	46 Bed 1 Storey Detached	10	SQFT	1	10
47	47 Bed 1 Storey Detached	10	SQFT	1	10
48	48 Bed 1 Storey Detached	10	SQFT	1	10
49	49 Bed 1 Storey Detached	10	SQFT	1	10
50	50 Bed 1 Storey Detached	10	SQFT	1	10
51	51 Bed 1 Storey Detached	10	SQFT	1	10
52	52 Bed 1 Storey Detached	10	SQFT	1	10
53	53 Bed 1 Storey Detached	10	SQFT	1	10
54	54 Bed 1 Storey Detached	10	SQFT	1	10
55	55 Bed 1 Storey Detached	10	SQFT	1	10
56	56 Bed 1 Storey Detached	10	SQFT	1	10
57	57 Bed 1 Storey Detached	10	SQFT	1	10
58	58 Bed 1 Storey Detached	10	SQFT	1	10
59	59 Bed 1 Storey Detached	10	SQFT	1	10
60	60 Bed 1 Storey Detached	10	SQFT	1	10
61	61 Bed 1 Storey Detached	10	SQFT	1	10
62	62 Bed 1 Storey Detached	10	SQFT	1	10
63	63 Bed 1 Storey Detached	10	SQFT	1	10
64	64 Bed 1 Storey Detached	10	SQFT	1	10
65	65 Bed 1 Storey Detached	10	SQFT	1	10
66	66 Bed 1 Storey Detached	10	SQFT	1	10
67	67 Bed 1 Storey Detached	10	SQFT	1	10
68	68 Bed 1 Storey Detached	10	SQFT	1	10
69	69 Bed 1 Storey Detached	10	SQFT	1	10
70	70 Bed 1 Storey Detached	10	SQFT	1	10
71	71 Bed 1 Storey Detached	10	SQFT	1	10
72	72 Bed 1 Storey Detached	10	SQFT	1	10
TOTAL		1880	SQFT	110	

Key:

- Site Boundary
- 1.8m high boundary fence
- 1.8m high screen wall / fence
- Private Drive
- Visibility Splays - 2.4x43m to Site Entrances
- Indicative Landscaping: Refer to landscaping design for exact details
- Number of parking spaces proposed to Semi-Detached and Detached Dwellings in accordance with LPA Parking Standards
- Parking space allocation to Frontage Parking Dwellings
- Affordable Housing
- Existing retained hedges/landscaping
- Landscaped Buffer to St Kentigern Hospice

Rev.	Description	Date
A:	Internal design review	11/06/21
B:	Plot Sub & Buffer to Hospice added	22/07/21
C:	Amended in line with Engineering appraisal & Tree Survey info added	24/08/21
D:	Internal Design Review	27/08/21
E:	Access to Hospice Buffer removed	20/10/21
F:	Schedule of Accommodation corrected	09/11/21
G:	Internal design review	26/02/22
H:	Wiltshire, Alderton & Chatsworth block amended	04/07/22
I:	Plots 2 and 12 handed & POS footpath added	13/07/22
J:	Attenuation basin corrected	20/07/22
K:	Plot Substitution	04/08/22

Castle Green

Castle Green,
Unit 20,
St. Asaph Business Park,
St Asaph,
Denbighshire, LL17 0LJ.
Tel. 01745 536677

Site:
Land off Upper Denbigh Road, St Asaph

Title:
Proposed Site Plan

Scale: 1:500@A0 Date: 11.06.21

Ref: UPD-STA-SP01 Rev: J1