

PLANNING STATEMENT

Land off Bodnant Avenue, Prestatyn

Prepared on behalf of

The Applicant – Adra (Tai) Cyfyngedig

March 2026

 **Address:**

5 Portal Business Park, Eaton Lane,
Tarporey, 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	2
3	PLANNING HISTORY	6
4	PROPOSED DEVELOPMENT	7
5	PLANNING POLICY CONTEXT	12
6	TECHNICAL AND POLICY ASSESSMENT	19
7	CASE FOR DEVELOPMENT	40
8	CONCLUSIONS AND PLANNING BALANCE	44

1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of the Applicant, Adra (Tai) Cyfyngedig (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 off Bodnant Avenue, Prestatyn (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought, as stated on the Application Form, comprises the following:

“Erection of 62 no. dwellings and associated infrastructure works comprising access, landscaping, drainage and open space provision; a sub-station; and a pumping station”

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement.

Pre-Application Consultation (PAC)

- 1.5. To inform this Application, the Applicant has engaged in formal pre-application consultation with Officers at Denbighshire County Council regarding the Site’s development potential.
- 1.6. Furthermore, and in accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation with the local community for the proposed ‘major’ development (by virtue of its scale in excess of ten dwellings). Full details, including the feedback/comments received and how these are addressed by the Applicant, will be documented in the Pre-Application Consultation Report 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 within the Ward of Prestatyn East. The Site is located towards the eastern of the town of Prestatyn and would represent a logical rounding off to the urban form given its permanent containment and location outwith the Green Barrier from which it is physically separated. The town of Prestatyn is well-connected to the strategic highway network (the A548 and A55), benefiting from good road access to other major settlements/towns and employment areas in Denbighshire, as well as the rail network via the Holyhead to Chester line.
- 2.3. In respect of its surroundings, the Site is adjoined to the east by the Nant Mill Touring Caravan Park. To the north and west of the Site lie the A548, Ffordd Parc Bodnant, and Bodnant Avenue (all of which are adopted highway). The southern boundary of the Site is formed by Nant Hall Road. There is dense, established woodland along the southern boundary of the Site which provides a visual separation/glimpsed views of the Site when viewed south of Nant Hall Road from the existing two-storey properties facing on to it, and beyond.
- 2.4. The presence of these existing dwellings, together with the surrounding road infrastructure, Bodnant Community School and Touring Caravan Park, have a direct urbanising influence upon the Site. Further contextual details and plans are contained within the accompanying Design and Access Statement.
- 2.5. An aerial image of the Site is provided in **Figure 1** below:

Figure 1: Aerial Image of the Site



Source: Google Earth

Site Description

- 2.6. The gross Site area extends to c. 2.5 hectares (25,019 square metres) inclusive of the proposed access.
- 2.7. The Site currently comprises open agricultural land.
- 2.8. Vehicular access to the Site is currently achieved via an existing gated access near to the junction of the A548 and Ffordd Parc Bodnant. New access arrangements are proposed as part of the planned development, as documented in Section 4 of this Statement.
- 2.9. There is an existing Public Right of Way which runs on a north to south axis in the eastern part of the Site (Route Code 205/30).
- 2.10. The majority of the Site lies in Flood Zone 1 as shown on the Natural Resources Wales *Flood Maps for Planning* (see **Figure 2** below) and thus is deemed to be at little or no risk of fluvial or coastal/tidal flooding. The most northern part of the Site does lie partly within Flood Zones 2 and 3, at risk of sea flooding, as documented in the accompanying Flood Consequences Assessment.

Figure 2: NRW Flood Maps for Planning



Source: NRW Flood Maps for Planning

- 2.11. The Site is located within the Prestatyn Castle Mound and Nant Hill Conservation Area. The nearest listed building to the Site comprises the Grade II listed Nant Mill, within c. 40m of the eastern boundary of the Site. Furthermore, the Grade II listed Nant Hall Hotel lies 700m to the east/north-east of the Site. Prestatyn Castle lies c. 100m north-east of the Site, and this is a Scheduled Monument.
- 2.12. The Site slopes gently and thus is free from any major topographical constraints and challenges.
- 2.13. There is existing dense woodland at the southern boundary of the Site, which are subject to Tree Preservation Order 2/13/1950. There are some trees along the route of Bodnant Avenue and Ffordd Parc Bodnant, albeit these are not subject to a Tree Preservation Order but do lie within the Conservation Area. There are no trees and hedgerows within the Site itself.

2.14. There is an existing sub-station building within the Site.

Locational Sustainability

2.15. 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.

Access to Education

2.16. The nearest Primary School to the Site is Bodnant Community Primary School located on Nant Hall Road to the immediate west/north-west of the Site. This can be safely accessed via the proposed access arrangements which form part of this Application.

2.17. The nearest Secondary School to the Site is Prestatyn High School located on Princes Avenue in the town; this lies c. 1.8km south-west of the Site.

2.18. 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

2.19. There are a number of shops and services available to the residents of Prestatyn within the town centre. This includes supermarkets (including the Tesco superstore within 400m of the Site), clothing shops, banking facilities, post office, pharmacies and hair salons, restaurants/take-aways, public houses and places of worship amongst others.

2.20. Overall, the Site benefits from very good access to local facilities to serve the everyday needs of future residents.

Access to Public Transport

2.21. The nearest bus stops to the Site are located c. 395m to the east of the proposed development on the A548 Prestatyn Road, and c. 430m to the south at the junction of Gronant Road and The Avenue. These will be accessible via the existing and proposed footpath network. Between them, these stops serve bus routes 11C, 11F, 11M, 13, F18, 35 and 36 providing regular services, seven days a week (in combination) to destinations including Rhyl, Prestatyn and Holywell amongst others. Prestatyn Bus Station is also located within an 800m walking distance of the Site.

2.22. Prestatyn Railway Station lies c. 0.92km west of the Site near to the town centre, a c. 10-minute walking distance. This provides daily services to Abergele, Bangor, Chester, Conwy, Crewe, Flint, Llandudno and Wrexham amongst others. Again, this can be accessed on foot via the existing footway network.

2.23. Further details of public transport services can be found in Section 4.3 of the accompanying Transport Assessment. Overall, the Site benefits from excellent access to sustainable modes of travel.

Access to Healthcare

2.24. There are existing medical centres/GP practices and dental surgeries in Prestatyn to provide healthcare services to local residents.

Access to Leisure / Recreation

- 2.25. Prestatyn Leisure Centre lies c. 1.8km from the Site located on Princes Avenue (at Prestatyn High School). The Nova Centre lies c. 1.8km from the Site on Beach Road West at the northern edge of the town.
- 2.26. The nearest existing equipped area of play to the Site can be found at Lyons Nant Hall Hotel located off Prestatyn Road, within c. 0.7km of the Site. A further equipped area of play is available at Station Road Children's Park, within a 1.1km walking distance of the Site.
- 2.27. As part of the proposed development, 2,360 square metres of formal public open space will be provided on the Site. A further 1,460 square metres of amenity will also be provided within the Site.
- 2.28. The Site enjoys very good access to outdoor areas of public open space, and which would be a significant health and well-being benefit to future residents of the proposed development.

Summary

- 2.29. Overall, the Site benefits from very good locational sustainability as confirmed in Section 4 of the accompanying Transport Statement. This is a demonstration of the Site's suitability and for the proposed residential land-use and scale of development put forward as part of this Application.

3 PLANNING HISTORY

- 3.1. There is no planning history associated with the Site which is relevant to the determination of this Application.
- 3.2. Notwithstanding this, this Statement does draw on examples of other planning permissions which have been granted in Denbighshire for comparable developments, as documented in Section 6 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 62 no. dwellings and associated infrastructure works comprising access, landscaping, drainage and open space provision; a sub-station; and a pumping station”

Amount

- 4.3. The proposed development will comprise the development of 62 no. dwellings (Use Class C3), all of which will be of an affordable tenure.

Housing Mix, Density and Floorspace

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

- 14 no. 2-person, 1-bedroom apartments;
- 8 no. 3-person, 2-bedroom bungalows;
- 19 no. 4-person, 2-bedroom houses;
- 9 no. 5-person, 3-bedroom houses;
- 10 no. 5-person, 3-bedroom corner houses; and
- 2 no. 7-person, 4-bedroom houses.

- 4.5. The proposed net density across the Site will be 25 dwellings per hectare.

- 4.6. The affordable homes will comprise a split of Social Rented and Affordable Rented (Intermediate) tenures, to be confirmed in discussions with the Council’s Housing Strategy Team. At present, it is proposed that it will comprise a 64%/36% tenure split across the Site as documented in the accompanying Affordable Housing Statement.

Scale and Massing

- 4.7. The majority of the proposed dwellings will be a maximum of two-storeys in height, with the exceptions being the bungalows comprising a single storey.

- 4.8. The proposed mix of dwellings (as set out in paragraph 4.4 above) allows for a layout which does not give cause to issues of massing which could otherwise be out-of-keeping with the local character and context, whilst also responding to local housing needs identified within the Council’s Local Housing Market Assessment and the most recently available housing waiting list/register information set out later in this Statement.

Layout

- 4.9. The Proposed Site Plan is shown on **Figure 3**. This incorporates a mix of mid and end-terraced/corner plots, and semi-detached properties. The layout has sought to positively address the street frontage throughout the Site; at the same time, the properties are set back from the road

to allow for off-road front and side parking. Furthermore, the size and type of dwellings are pepper-potted through the Site, providing for a more balanced layout/development. Full details of the design development, evolution and rationale are provided in the accompanying Design and Access Statement, including justification for the proposed density of development.

- 4.10. The layout has been designed such that it respects the Council's required separation distances and avoids any issues of overlooking and impact on the residential amenity of surrounding residential properties to the south of the Site (the privacy of which will be maintained through the retention of established landscaping which forms part of the existing Tree Preservation Order, alongside new planting). Appropriate separation is also maintained to the Touring Caravan Park to the east.
- 4.11. 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 includes surveillance of the formal public open spaces and amenity spaces within the Site. 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.

Figure 3: Proposed Site Plan



Source: Drawing Ref. 010 Rev. C (Ainsley Gomon Architects)

- 4.12. The Proposed Site Layout has sought to retain the existing soft landscape features around the Site. In addition, new tree, hedgerow and shrub planting is proposed as illustrated on the submitted Landscape Plan.
- 4.13. The Proposed Site Layout has also taken account of the Public Right of Way which runs north to south across the Site.

Appearance and Materials

- 4.14. It is proposed that 6 no. house types will be delivered across the Site; further details, including floorplans, are provided on the submitted drawing package. details, including floorplans, are provided as part of the submitted drawing package and within the accompanying Design and Access Statement.
- 4.15. The palette of materials proposed by the Applicant provides an opportunity to place-make and create a strong character, identity and legibility through the proposed development. Further details are provided in the accompanying Design and Access Statement.
- 4.16. 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

- 4.17. A Landscape Plan has been prepared and is submitted with the Application. This provides details of new tree and hedgerow planting within and at the perimeter of the Site alongside retained natural features. This will include native tree and amenity shrub planting, as well as amenity planting and grass/wildflower seeding. Private lawned gardens will also be provided.
- 4.18. The proposed boundary treatments will likely include hit and miss fencing to the side and rear of properties to define plot curtilages, as well as the use of timber gates. All fences will be required to have hedgehog compliant access holes and advisory signage.
- 4.19. Other boundary treatments around the Site will include 1.5m timber post and rail fencing, and 1.1m high metal bow top fencing.
- 4.20. The proposed development will incorporate c. 2,360 square metres of formal public open space located towards the northern edge of the Site (ensuring that no built development is located within any areas at risk of flooding), with 1,460 square metres of additional amenity space located elsewhere across the Site. An attenuation basin will be located towards the northern edge of the Site as part of the proposed surface water drainage strategy.

Accessibility

- 4.21. A new vehicular (and pedestrian/cycle) access into the Site is proposed from Bodnant Avenue. This is shown on Drawing Ref.1932/03 contained within the accompanying Transport Statement and the Proposed Site Layout Drawing Ref. 010 Rev. C.
- 4.22. The works proposed as part of this Application will include a new junction designed to typical residential standards and will provide a 5.5m wide access road, 6m corner radii and a 2m wide continuous footway on both sides of the road from the entrance to the edge of the main body of the proposed development (albeit initially only on the west side of the access).

- 4.23. The visibility splays at the Site access will be 2.4m x 34m. These have been informed by a traffic survey. There will be 37m stopping sight distances.
- 4.24. The internal road arrangements have been designed to ensure the movement of service and refuse vehicles (10.6m) without allowing their requirements to dominate. Swept path analysis has been undertaken to inform the proposed layout, details of which can be found on Drawing Ref. 1932/SP/01 of the accompanying Transport Statement.
- 4.25. The existing Public Right of Way will be retained and upgraded, with pedestrian connections provided throughout the Site as shown on the submitted Proposed Site Layout.
- 4.26. Dropped kerb crossings with tactile paving will be provided within the Site. These will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all.
- 4.27. The internal footways 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.
- 4.28. In respect of vehicle parking, the following standards have been applied to the proposed development:
- 1 no. car parking space per apartment;
 - 2 no. car parking spaces per 2 and 3 bedroom dwellings; and
 - 3 no. car parking space per 4-bedroom dwelling,
- 4.29. In total, 112 no. resident car parking space are proposed as well as 10 no. visitor parking spaces.
- 4.30. Details of the external street lighting shall be agreed with the County Highways Authority.
- 4.31. Secure cycle parking can be provided within buildings and/or lockable garden sheds.

Waste and Recycling

- 4.32. Each of the proposed dwellings will have its own private bin storage area within its curtilage to aid waste collection and recycling.
- 4.33. 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.

Drainage

- 4.34. The proposed development will incorporate the following drainage measures, as documented within the accompanying Flood Consequences Assessment and Drainage Strategy:
- **Surface Water** – on the basis that the existing ground can be used for infiltration, this will be used as the primary means of managing surface water discharge from the development including roof areas, hard landscaped areas, car parking areas and access roads. It is proposed that the surface water infiltration system will have an emergency overflow connected to the existing 900mm diameter public surface water sewer located adjacent to the north-western boundary. The flow rate will be restricted to suit the greenfield run off rate of 3.7 l/s. The surface water network will have an infiltration basin providing approximately

737m³ of storage. The basin will have a flow restricted emergency overflow. Welsh Water have been contacted to confirm approval in principle to connection with the public sewer. Additional SuDS features will include on-site plot including permeable paving for the car parking areas, water butts, bio-retention rain gardens and infiltration trenches to provide surface water runoff management at source. These features will be private and maintained by Adra or the individual property owners; and

- **Foul Water** – an existing combined sewer crosses the Site and Dwr Cymru have confirmed that this has the capacity to accommodate the foul water from the proposed development. At present, no existing foul water drainage is located within the Site boundary. The proposed foul drainage is to be collected from each plot and discharged into the proposed foul water drainage network. This network collects into a proposed adopted foul water pumping station located to the north-east of the Site. The pumping station will then discharge via rising main to break chamber within the Site boundary. This will then drain via gravity to the existing public foul water network within Nant Hall Road to the south of the Site.

Sustainability Measures

4.35. It is noted that Denbighshire has declared a climate change emergency. Accordingly, and in response, it is anticipated that the proposed development will incorporate some of the following sustainability measures:

- **Dwelling Design** – as an overriding principle, the design of the proposed development has sought to implement the energy hierarchy by reducing energy demands and then increasing energy efficiency in the dwellings. This will ensure that the properties are as energy efficient as possible in order not to adversely contribute towards future climate change. All dwellings will achieve an EPC A Rating;
- **Cycle Storage** – it is proposed that a lockable cycle store will be provided to all plots;
- **Water** – in order for the proposed dwelling to utilise as little water as possible, water efficiency within the properties will be maintained through the installation of dual flush toilets and the use of flow restrictors on taps;
- **Drainage** - a sustainable urban drainage system will be implemented across the Site, as outlined earlier in this Section; and
- **Waste Management** – a post-construction domestic waste management and recycling scheme will be implemented. All kitchens will have internal recycling bins to encourage residents to recycle and minimise their own waste.

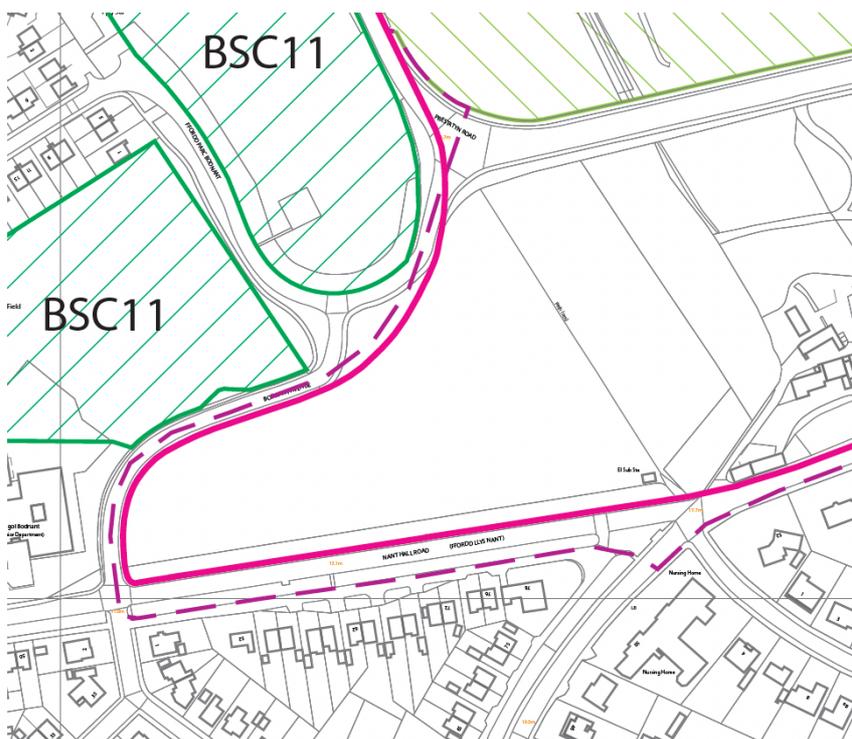
5 PLANNING POLICY CONTEXT

- 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 12 (“PPW12”) published in February 2024.
- 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); and**
 - **Denbighshire Local Development Plan Proposals Map.**
- 5.5. The adopted LDP is now time-expired, and thus the weight to be afforded to the policies will depend on the degree consistency of the LDP with PPW12.
- 5.6. On the Local Development Plan Proposals Map, the Site lies outside but immediately adjacent to the development boundary of Prestatyn and is not allocated for any specific land-use.

Figure 4: Local Development Plan Proposals Map Extract



Local Development Plan

- 5.7. 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 1: Relevant Local Development Plan Policies

Policy Reference	Policy Title
BSC1	Growth Strategy for Denbighshire
BSC2	Brownfield Development Priority
BSC3	Securing Infrastructure Contributions from Development
BSC4	Affordable Housing
BSC11	Recreation and Open Space
BSC8	Rural Exception Sites
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

- 5.8. 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.
- 5.9. This is the case in Denbighshire. Accordingly, the adopted LDP remains the development plan for the purposes of determining this Application. The replacement LDP and its emerging evidence base carries very limited weight.
- 5.10. This was previously acknowledged by the Council in paragraph 5.6 of its LDP Annual Monitoring Report 2023.

Emerging Local Development Plan

- 5.11. At the time of writing, Denbighshire County Council has undertaken the following stages in the preparation of its replacement LDP:
- LDP Delivery Agreement Published on 22nd May 2018
 - Consultation on Pre-Deposit Preferred Strategy held between 8th July 2019 and 30th August 2019. This set out various growth options; it did not identify any specific site allocations.
- 5.12. No further consultation has taken place on the replacement LDP since 2019.
- 5.13. A new Delivery Agreement was published by the Council in December 2022. Based on this latest Agreement, the new LDP was not intended to be adopted until September 2025; however, this is already more than 12 months behind schedule.

- 5.14. The replacement LDP and its emerging evidence base carries no material weight in the determination of this Application. Again, this is accepted by the Council on page 15 of its LDP Annual Monitoring Report 2024.

Planning Policy Wales 12

- 5.15. PPW12 is a material consideration in planning decisions. PPW12 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.
- 5.16. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.
- 5.17. Within PPW12, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 5.18. Placemaking features strongly within PPW12, 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.
- 5.19. Chapter 3 of PPW12 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.
- 5.20. Paragraph 3.60 of PPW12 recognises that *"infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing."*
- 5.21. Chapters 3 and 4 of PPW12 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.
- 5.22. Chapter 4 of PPW12 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.
- 5.23. Paragraph 4.2.25 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.24. Paragraph 4.2.26 confirms that affordable housing includes social rented housing owned by local authorities and Registered Social Landlords and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents.

-
- 5.25. Paragraph 4.2.27 sets out the importance for local planning authorities to have an appreciation of the demand for different types of affordable housing in relation to supply.
- 5.26. Paragraph 4.2.29 sets out the requirement for all affordable housing to meet the Welsh Government's development quality standards.
- 5.27. Paragraph 4.2.33 states that planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable.
- 5.28. Paragraph 4.2.34 requires that affordable housing provided on exception sites should meet the needs of local people in perpetuity.
- 5.29. 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 of local businesses and communities. Landscape value is identified as an intrinsic part of PPW12, 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 demonstrated through a Green Infrastructure Statement as required by paragraph 6.2.12. Paragraph 6.2.13 recognises that green infrastructure can have wider cumulative benefits, particularly in relation to biodiversity and the resilience of ecosystems as well as in securing the other desired environmental qualities of places.
- 5.30. Chapter 6 also covers matters relating to flood-risk and drainage. PPW12 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.

Future Wales – The National Plan 2040

- 5.31. The Welsh Government published the National Plan in February 2021. It serves as the national development framework for Wales, a spatial plan setting the direction for development nationally up to 2040. It provides the basis upon which further guidance, including Planning Policy Wales and Local Development Plans, should be prepared.
- 5.32. Within Denbighshire, the National Plan identifies Rhyl and Prestatyn as Regional Growth Areas. These will be a focus for managed growth and have an important sub-regional role complementing the National Growth Area of Wrexham and Deeside.
- 5.33. In respect of housing delivery, the National Plan requires a mix of housing types and tenures to create social inclusion and to cater for mixed lifestyles and working arrangements.

- 5.34. Policy 7 focuses on the delivery of affordable homes. Providing housing at levels which meets needs is stated to be a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.
- 5.35. In the North, Local Development Plans should seek to support growth and appropriate development in rural towns and villages. This includes market and affordable housing.

Technical Advice Notes (TAN)

- 5.36. Alongside PPW12, 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
 - TAN12 – Design
 - TAN15 – Development and Flood Risk
 - TAN16 – Recreation and Open Space
 - TAN18 – Transport
 - TAN20 – Planning and the Welsh Language
 - TAN24 – The Historic Environment
- 5.37. In respect of TAN2, this is a material planning consideration that should be read alongside PPW12 as documented above, in the determination of planning applications.
- 5.38. The purpose of TAN2 is to provide advice to local planning authorities on how to determine affordability. This includes the need for a collaborative approach working alongside stakeholders
- 5.39. Paragraph 3.2 of TAN2 sets out the need for local planning authorities to include an affordable housing target in their development plan which is based on the housing need identified in the local housing market assessment. It should set out how this target will be achieved, and monitor development on an annual basis.
- 5.40. Paragraph 5.1 of TAN2 defines affordable housing as including social rented housing and intermediate housing.
- 5.41. TAN2 recognises that affordability is one of the key factors influencing housing demand and need. Information on affordability will therefore be an important consideration in developing policies to deliver/meet affordable housing needs.

Other Material Planning Considerations / Evidence Base Documents

- 5.42. 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.

Joint Housing Land Availability Study

- 5.43. 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 PPW12 were not met.

- 5.44. 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.

LDP Annual Monitoring Report

- 5.45. Based on the figures contained in Table 2 of the Council's 2022 LDP Annual Monitoring Report (AMR), total housing delivery (completions) in Denbighshire for the LDP period 2006 to 2021 equated to 3,104 dwellings. This represented a significant shortfall against the LDP requirement for 7,500 homes during the same period.
- 5.46. These figures clearly illustrate 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 2021/22, 422 new homes were completed 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). This annual completion figure reduced in 2022-23 to 256 dwellings, with 258 dwelling completions in 2023-24 and 351 dwellings in 2024-25.
- 5.47. The Council's latest 2025 Annual Monitoring Report includes a projection at Chart 1 which shows a **significant future shortfall** in housing completions against the as yet untested Replacement LDP annual housing requirement of 218 dwellings per year from 2025/26 onwards.

Local Housing Market Assessment (LHMA)

- 5.48. The Council's most recent LHMA Update was published in July 2019. Prestatyn is identified as its own Housing Market Area (LHMA02).
- 5.49. The County of Denbighshire is identified as having a high proportion of older people aged 65 and over compared to the national average in Wales. This is shown in Table 1 above. As such, there are more people on average in the over 65 age groups than in the economically active age group of 16-64 in Denbighshire (compared to the national average). The life expectancy of those in the 65 and over age group is also expected to increase between 2019 and 2024, with a small reduction in the 16-64 age group.
- 5.50. Within the Prestatyn Housing Market Area, the LHMA identifies a particular need for 1 and 2 bedroom affordable homes in LHMA02 based on the SARTH, and 2 and 3 bedroom homes based on the Tai Teg Register (social and intermediate housing).
- 5.51. Across the County there is identified to be an annual requirement for 155 affordable homes per annum (social and intermediate housing need).
- 5.52. Further details are provided in Section 6 of this Statement and the accompanying Affordable Housing Statement.

Local Planning Guidance Notes

- 5.53. 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 Areas*
 - 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*

5.54. Compliance of the proposed development with these SPGNs 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

Local Development Plan Status

- 6.2. As documented in Section 5 of this Statement, the proposed development should be determined against the policies of the development plan unless material considerations indicate otherwise. In the context of this Application, the development plan comprises the Denbighshire LDP.
- 6.3. As set out in Section 5 of this Statement, 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. This is the case in Denbighshire, as confirmed in paragraph 5.6 of the Council's 2023 Annual Monitoring Report.
- 6.4. Accordingly, the adopted LDP remains the development plan for the purposes of determining this Application despite it being time-expired. However, the weight to be afforded to each policy needs to be considered in respect of its consistency with PPW12.
- 6.5. The replacement LDP and its emerging evidence base carries no material weight, as confirmed by the Council in its Annual Monitoring Report 2024.

The Role of Prestatyn

- 6.6. Prestatyn is identified in the adopted LDP as a *Lower Growth Town* within the County which makes an important contribution to its housing and employment needs.

Land-Use Designation

- 6.7. On the LDP Proposals Map, the Site lies outside but immediately adjacent to the development boundary of Prestatyn and is not allocated for any specific land-use. It is within the open countryside, but outwith the Green Barrier. It is one of very few greenfield parcels of land located outside of the settlement boundary of Prestatyn which is not within the Green Barrier.
- 6.8. Policy BSC8 of the adopted LDP allows for Rural Exceptions Sites adjacent to settlement boundaries in Denbighshire. However, this excludes the Lower Growth Towns.
- 6.9. This was the case for Application Ref. 43/2020/0521 when approved by the Council on 19th January 2022 for the development of 102 no. affordable homes on land outside but immediately adjacent to the settlement boundary of Prestatyn, lying within the open countryside.

Case for Development

- 6.10. In light of the above, it is necessary to establish whether any other material planning considerations exist to justify the proposed development.
- 6.11. To this end, we go on to consider the following:

- The weight to be afforded to the delivery of affordable housing;
- Historic affordable housing completions in Denbighshire;
- Affordable Housing Needs in the Prestatyn Housing Market Area, including the information contained in the LHMA and the latest SARTH and Affordable Housing (Tai Teg) Registers;
- The availability of alternative non-countryside sites around Prestatyn, including allocations and commitments;
- Private rental market;
- House prices; and
- Deliverability timescales and commitments, including Grant Funding.

The Weight to be afforded to Affordable Housing Delivery

- 6.12. As documented in Section 5 of this Statement, paragraph 4.2.25 of PPW12 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 6.13. The need for affordable housing in Denbighshire is well-established for the reasons set out later in this Section, and is a material consideration to be afforded weight. This reflects the same approach that the Council adopted in its determination of Application Ref. 43/2020/0521.
- 6.14. National policy clearly emphasises the need to increase the supply of affordable housing, as documented in the Ministerial '*Dear Chief Planning Officer*' letter published on 8th July 2019, Future Wales – *The National Plan 2040*, and PPW12. The unmet need for affordable housing is not being met through the general housing market in Denbighshire, and that has been the case historically in Denbighshire since the start of the LDP Plan Period in 2006 as documented below.

Affordable Housing Completions in Denbighshire

- 6.15. As confirmed in Section 5 of this Statement, there has been a significant under-supply in overall housing delivery across the County of Denbighshire since 2006, falling considerably below the housing requirement set out in the adopted LDP for the period 2006 to 2021 (7,500 homes). In total, the shortfall extends to 4,396 dwellings. The currently adopted annual housing requirement remains in place until such time that the Replacement LDP has advanced through Examination in Public, which remains some considerable time off as confirmed in Section 5 of this Statement.
- 6.16. The emerging requirement for 218 dwellings per annum in Denbighshire, as set out in the Replacement LDP Preferred Strategy, has not yet been tested to attract material weight (by the Council's own admission at page 15 of its 2024 Annual Monitoring Report). Even if this figure were deemed acceptable, DCC's 2025 Annual Monitoring Report (Chart 1) has itself demonstrated that this figure cannot be met in the period 2025/26 onwards even when allowing for any outstanding LDP housing allocations to come forward during that time. As such, there is the need for additional housing delivery from other sources of supply.
- 6.17. In order to understand the delivery of affordable housing during the LDP Plan period 2006-2024, we have had reference to the Stats Wales completions data. This is presented in Table 2 below:

Table 2: Affordable Housing Completions in Denbighshire for period 2006/07 to 2023/24

Year	Annual Affordable Housing Completions
2006/07	No Data
2007/08	78
2008/09	134
2009/10	87
2010/11	154
2011/12	60
2012/13	61
2013/14	16
2014/15	74
2015/16	55
2016/17	67
2017/18	60
2018/19	35
2019/20	119
2020/21	120
2021/22	256
2022/23	143
2023/24	154
Total	1,673
Average per Year	92.9

Source: Stats Wales Affordable Housing by Location and Year

- 6.18. As documented in Table 2 above, there has been a persistent shortfall in affordable housing delivery across Denbighshire against the LHMA 2019 need for 155 affordable homes in the period since 2018, with the exception of 2021/22 (most likely as a result of the slowdown during the Covid-19 pandemic).
- 6.19. In the period before this, the *Justification* text to Policy BSC4 of the LDP refers to previous housing needs identified in the North East Wales Local Housing Market Assessment published in 2008 (a need for 3,761 affordable homes, which would equate to 250 affordable homes a year over 15 years) and the Update of Housing Need, Demand and Affordability in the Local Housing Market Areas of Denbighshire published in 2011 (a need for 2,916 affordable homes, which would equate to 194 affordable homes a year over 15 years). Clearly, none of these needs have been met at any point since 2006.
- 6.20. Policy BSC4 of the LDP also refers to “approximately 2,250-3,000 affordable homes will be provided over the Plan Period” in Denbighshire (2006-2021). That figure, together with the overall housing requirement of 7,500 homes, has evidently not been met resulting in a considerable unmet need.
- 6.21. Whilst the LDP set out to meet the County’s housing needs through housing allocations, the reality is that this approach has failed to deliver. The failure of the Bodelwyddan Key Strategic Site to come forward for in the region of 1,715 no. dwellings (including c. 114 affordable homes based on

page 29 of the LDP) (for which the outline planning permission has now lapsed) has had a significant adverse impact on housing delivery in the County.

- 6.22. 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. 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 forward from windfall sites during the Plan Period 2006-2021. 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 (i.e allocations and commitments); the failure of the Bodelwyddan Key Strategic Site to come forward and deliver 1,715 dwellings, as documented later in this Section, has had a significant adverse impact on overall housing delivery across the County during the now time-expired LDP Period.
- 6.24. It is evident that there is a considerable need for new market and affordable housing to come forward on both brownfield and greenfield sites to meet the requirement, both adopted and emerging (as proposed in the Preferred Strategy). That position has not changed, and indeed the housing supply shortfall in Denbighshire has exacerbated to unsustainable and harmful levels.

Affordable Housing Needs

- 6.25. As per the information contained in Section 5 of this Statement and above, there is evidently a housing shortfall in Denbighshire which needs to be urgently addressed through positive decision-taking. The proposed development represents a logical development opportunity to realise new affordable housing delivery in a sustainable Lower Growth Town on a sustainable and logical Site.
- 6.26. In order to understand the housing needs in the settlement of Prestatyn, reference has been had to the Council’s latest LHMA 2019, as documented in Section 5 of this Statement, and the latest Social Housing (SARTH) and Affordable Housing (Tai Teg) Registers.

Table 3: SARTH Housing Register – Applications for Prestatyn and Meliden Area as of February 2026

Overview of demand for social rent homes in the area	Area	Bedroom	Applications	1st Choice
	Prestatyn	1	537	363
		2	186	123
		3	103	70
		4	56	31
		5+	25	24
		Total	907	611
	Meliden	1	321	242
		2	131	100
		3	62	41
		4	49	32
		5+	16	16
		Total	579	431

Source: Denbighshire SARTH Housing Register as of February 2026

- 6.27. The latest Tai Teg figures are set out below:

Table 4: Tai Teg Housing Register – Applications for Prestatyn and Meliden Area as of February 2026

Town	Apartment / Flat (1 bed)	Apartment / Flat (2 bed)	House (1 bed)	House (2 bed)	House (3 bed)	House (4+ bed)	Bungalow (1 bed)	Bungalow (2 bed)	Bungalow (3 bed)
Meliden	0	0	0	19	9	1	1	2	0
Prestatyn	6	6	3	110	87	30	2	12	1

- 6.28. Within the Prestatyn Local Housing Market Area, the LHMA has identified a particular need for 1 and 2 bedroom affordable homes in LHMA03 based on the SARTH, and 2 and 3 bedroom homes based on the Affordable Housing (Tai Teg) Register (social and intermediate housing).
- 6.29. Further details are provided within the accompanying Affordable Housing Statement prepared by the Applicant, including details of existing affordable housing stock within the locality.
- 6.30. In summary, the LHMA, the Affordable Housing Prospectus, and the SARTH and Affordable Housing (Tai Teg) Registers all demonstrate an unmet affordable housing need in Prestatyn and the Housing Market Area in which it sits (LHMA02). The proposed development of 1, 2, 3 and 4 bedroom properties will offer an opportunity for families to locate into new, modern premises which cater for their specific needs, benefiting from improved living conditions.

- 6.31. It is understood that the SARTH and Affordable Housing (Tai Teg) Housing Registers do not capture all of the households whom are in *need* of affordable housing. It merely provides details of those in priority need whom the Housing Strategy Team/Department at Denbighshire County Council are seeking to provide accommodation. Accordingly, the households in need of affordable housing in Denbighshire (including Prestatyn) will go beyond the number of applicants on the SARTH and Affordable Housing (Tai Teg) Housing Registers.
- 6.32. Taking account of the above, the scale of the proposed development, at 62 no. dwellings, would in no way prejudice the Council’s emerging Replacement LDP and its development strategy. It would not be premature. To the contrary, it would deliver a much-needed housing scheme comprising only affordable homes, responding to both a local and wider County-wide need, which it is considered should attract significant positive weight in the overall planning balance.

Alternative Sites in Prestatyn

- 6.33. Based on the LDP Proposals Map, and Policy BSC1, there were 6 no housing allocations in Prestatyn/Meliden expected to come forward during the LDP Plan period up to 2021, delivering an indicative figure of 318 dwellings. Of the allocations in Prestatyn, it is understood that both sites have come forward for residential development and are no longer available (Midnant Farmstead and Tip Lane).
- 6.34. Based on the evidence of affordable housing need and past delivery affordable housing delivery rates at a County level (as documented earlier in this Section), there remains a residual affordable housing need in Prestatyn which will not be met by the extant commitments alone. Accordingly, additional sources of supply are now required otherwise there will, in effect, be something of a ‘policy vacuum’ by which to deliver new affordable housing outside of settlement boundaries until such time that a replacement LDP is adopted in Denbighshire.
- 6.35. There is no other greenfield land outside of the settlement boundary of Prestatyn which is considered to be sequentially preferable to the Site in that regard. Beyond the policies map designations, other considerations that have to be factored in when assessing alternative parcels of land outside of the settlement boundary include Green Barrier/Wedge protection, best and most versatile agricultural land, flood-risk, accessibility and sustainability, and topography.
- 6.36. In summary, the Site is therefore considered to be one of very few opportunities to meet the affordable housing needs of Prestatyn on land outside of the Green Barrier/Wedge.

Private Rental Market

- 6.37. Details of private rents across Denbighshire have been obtained using the Stats Wales PRS Rents interactive table. These cover the years 2013 and 2019. Accordingly, we have assessed how private rents have changed in Denbighshire during this period (as the latest available published data).

Table 5: Median Private Rents in Denbighshire, 2013/14 and 2019/20

Bedroom Numbers	Median Rent in 2013/14	Median Rent in 2019/20	% Change
Denbighshire			
1-bedroom	£365	£395	+8.2
2-bedroom	£475	£525	+10.5

3-bedroom	£575	£600	+4.3
4+ bedroom	£700	£785	+12.1
Wales			
1-bedroom	£400	£450	+12.5
2-bedroom	£491.73	£525	+6.7
3-bedroom	£550	£575	+4.5
4+ bedroom	£730	£795	+9

Source: Stats Wales – Private Sector Rents Interactive Table

- 6.38. The data set out in Table 5 above shows that private rents have increased for every property size in Denbighshire between 2013/14 and 2019/20. Whilst this might not be unexpected, the rate of rental growth for 2 and 4 bedroom properties are well in excess of the national average respectively.
- 6.39. The same data source has also been used to assess the lower quartile rents in Denbighshire over the same period. These rents are typically for people on lower incomes, including households that may be reliant on housing allowances to help cover some of their accommodation costs.

Table 6: Lower Quartile Private Rents in Denbighshire, 2013/14 and 2019/20

Bedroom Numbers	Lower Quartile Rent in 2013/14	Lower Quartile Rent in 2019/20	% Change
Denbighshire			
1-bedroom	£346.67	£350	+0.9
2-bedroom	418	£475	+13.6
3-bedroom	£525	£550	+4.76
4+ bedroom	£650	£690	+6.15
Wales			
1-bedroom	£350	£375	+7
2-bedroom	£425	£450	+5.8
3-bedroom	£475	£495	+4
4+ bedroom	£625	£650	+4

Source: Stats Wales – Private Sector Rents Interactive Table

- 6.40. Table 6 illustrates that there have again been large increases across the board for all property sizes when it comes to lower quartile private rents. The growth of lower quartile private rents in Denbighshire has exceeded the national average for all property sizes, with the exception of 1-bedroom homes. Again, considerable rental growth was seen in the 2 and 4 bedroom sector.

House Prices

- 6.41. Statistical information is available at a more localised level to understand the median house prices, and how these compare to the County average. This comprises the HPSSA datasets 2 and 9.
- 6.42. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000043 'Denbighshire 002' in which the Site is located, the following median house prices have been identified covering a 10-year period;

- **March 2013** – median house price of £142,500
 - **March 2023** – median house price of £210,000
- 6.43. This shows an increase of £67,500 to the median house price over a 10-year period at a local level, equating to a 47.3% increase.
- 6.44. In Denbighshire as a County, the median house price was £125,000 in March 2013, and £185,500 in March 2023, an increase of 48.4% over a 10-year period.
- 6.45. Accordingly, the median house price increase in the MSOA area is in line with the County level increase between March 2013 and March 2023.
- 6.46. The LHMA identified the median household income in LHMA02 in 2017 to be £25,890. Given that mortgage lenders will typically lend a household three and a half times their household income, this would require a median income of £60,000 to afford a median house price in March 2023. As such, there are issues of affordability in Prestatyn. Whilst median household income will likely have increased since 2017, there will remain issues of affordability in Prestatyn.
- 6.47. As with the median house prices, statistical information is available at a more localised level to understand the lower quartile house prices, and how these compare to the County average. This comprises the HPSSA datasets 4 and 15.
- 6.48. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000043 'Denbighshire 002' in which the Site is located, the following lower quartile house price have been identified over a 9-year period (based on latest available data):
- **March 2013** – lower quartile house price of £111,000
 - **March 2022** – lower quartile house price of £152,000
- 6.49. This shows an increase of £41,000 to the lower quartile house price over a 9-year period at a local level, equating to a 36.9% increase.
- 6.50. In Denbighshire as a County, the lower quartile house price was £95,750 in March 2013, and £142,000 in March 2022, an increase of 48.3% over a 9-year period.
- 6.51. Accordingly, the lower quartile house price increase in the MSOA area has increased at a slower rate to the County level, but nevertheless has still increased by over a third over a 9-year period.
- 6.52. The LHMA identified the lower quartile household income in LHMA02 in 2017 to be £14,935. Given that mortgage lenders will typically lend a household three and a half times their household income, this would require a median income of £43,428 to afford a lower quartile house price in March 2022. Again, whilst lower quartile household income will likely have increased since 2017, there will remain issues of affordability in Prestatyn.

Deliverability

- 6.53. A Deliverability Statement has been prepared by the Applicant and is submitted alongside this Statement.

- 6.54. This confirms that Adra (Tai) Cyfyngedig has agreed a contract with the current landowners to purchase the Site subject to receipt of a satisfactory planning permission. There are no legal matters which would preclude the deliverability of the proposed development.
- 6.55. Adra would seek to complete the first property within 9 months of having obtained the legal rights to commence development (i.e following the discharge of any pre-commencement planning conditions and planning obligations). It would then be the intention to develop at a rate of 40 dwellings a year, allowing for final completion of the scheme with 24 months of commencement (albeit this could be reduced to 21 months).
- 6.56. Adra can confirm it has funding in place to carry out the proposed development and have commenced discussions on Social Housing Grant Support with Denbighshire County Council should the proposed development be approved. Adra has the financial means available to deliver the proposed development in accordance with the timescales outlined above.

Summary Position on Affordable Need

- 6.57. The key headlines to be drawn from this Section are:
- There is a high demand and need for affordable housing of different types and size in the Prestatyn area based on the number of applicants seeking accommodation on the Social Housing and Affordable Housing (Tai Teg) Housing Registers;
 - Housing delivery across Denbighshire has failed to meet the LDP requirement for the period 2006-2021, which in turn has adversely impacted on affordable housing delivery;
 - Median and lower quartile rents in Denbighshire have increased between 2013 and 2019, well in excess of the respective national averages;
 - Median house price increases in the MSOA area where the Site is located have exceeded the County average, all of which have increased significantly over the period from March 2013 to March 2022/2023 creating issues of affordability. The same applies in respect of lower quartile house prices and a lack of affordability. The shortfall in housing delivery across Denbighshire between 2006 and 2021 has resulted in demand outstripping supply, in turn leading to higher house prices beyond the reach of many; and
 - To this end, the proposed intermediate rented homes will be targeted at those who are in employment, not dependant on benefits, and earning between £16,000 and £45,000 a year. The levels of rent for intermediate rental units is determined by local market rents, usually rated as 80% of the market rent for similar dwellings in that area.
- 6.58. In view of the above, it is clear that the need to increase the supply of and access to affordable housing in Denbighshire is becoming ever more important, and there is a pressing need to address issues of affordability within Prestatyn. The findings demonstrate evidence of genuine, proven local need for affordable housing in Prestatyn and that the proposed development is a deliverable solution by which to address some of the shortfall.
- 6.59. Given the scale of the evidenced need for affordable housing both in Prestatyn and at a County-wide level owing to a historic shortfall in housing delivery, the social benefits arising from the proposed development are considered to outweigh conflict with the now time-expired policies of the Denbighshire LDP. In the absence of a forward housing strategy until such time that a Replacement

LDP is adopted, the delivery of affordable housing and the weight to be afforded to it in line with PPW12 is considered to carry significant weight in support of the proposed development, subject to demonstrating compliance with wider policy considerations.

Housing Mix

- 6.60. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:
- 14 no. 2-person, 1-bedroom apartments;
 - 8 no. 3-person, 2-bedroom bungalows;
 - 19 no. 4-person, 2-bedroom houses;
 - 9 no. 5-person, 3-bedroom houses;
 - 10 no. 5-person, 3-bedroom corner houses; and
 - 2 no. 7-person, 4-bedroom houses.
- 6.61. The proposed net density across the Site will be 25 dwellings per hectare, having regard to the Site's location, surroundings and configuration. Whilst Policy RD1 of the Local Development Plan seeks to achieve minimum densities of 35 dwellings per hectare, it does recognise that in some cases a lower density may be acceptable. In this instance, the number of dwellings responds to local affordable housing needs having regard to Policy BSC8, whilst also seeking to positively address other policy requirements (on-site open space, play area, footways), as well as responding to constraints which include root protection areas, a public right of way, the presence of an existing water main easement and sub-station, and the need for 1 no. overflow detention basin as part of the surface water drainage solution. Further details are provided in the accompanying Design and Access Statement.
- 6.62. The proposed development will comprise solely of 100% affordable housing in the form of social rented and intermediate rented tenures. It is proposed that 40 no. properties will be social rent, and 22 no. properties intermediate rent (a split of 64%/36%). This mixed tenure split can be agreed with the Housing Strategy Team at Denbighshire County Council prior to the determination of the Application.
- 6.63. The proposed development comprises the following balanced housing mix:
- 22.5% 1-bedroom properties
 - 43.5% 2-bedroom properties
 - 31% 3-bedroom properties
 - 3% 4-bedroom properties.
- 6.64. The proposed housing mix and tenure split has had regard to the needs identified in the Council's LHMA and the latest SARTH and Affordable Housing (Tai Teg) Registers, responding to the needs of both young and older households in the local area. The proposed mixed tenure approach has the ability to create a sustainable community, providing new housing for the older population as part of the development in the form of bungalows.
- 6.65. In respect of housing mix, one also has to have consideration to the fact that 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 in July 2019, pre-pandemic, and thus is now something of a limitation relating to that particular evidence base.

- 6.66. 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.
- 6.67. Accordingly, those people previously seeking a one-bedroom property may now be seeking a two-bedroom property, and those seeking a two-bedroom property may now be seeking a three-bedroom property, subject to availability and affordability.
- 6.68. It is therefore crucial that the housing market responds to these needs, both now and in the future. It is not '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.
- 6.69. The Applicant is therefore of the view that the demand for more living space must be reflected in the housing mix presented as part of the proposed development. To this end, the proposed mix is considered to respond positively towards striking the right balance between the affordable housing needs identified in the LHMA, Affordable Housing Prospectus, and the SARTH and Affordable Housing (Tai Teg) Registers, and the changes arising since the Covid-19 pandemic.
- 6.70. As outlined earlier in this Section, 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 PPW10. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1, BSC4, the Affordable Housing SPGN, TAN2, and PPW12.

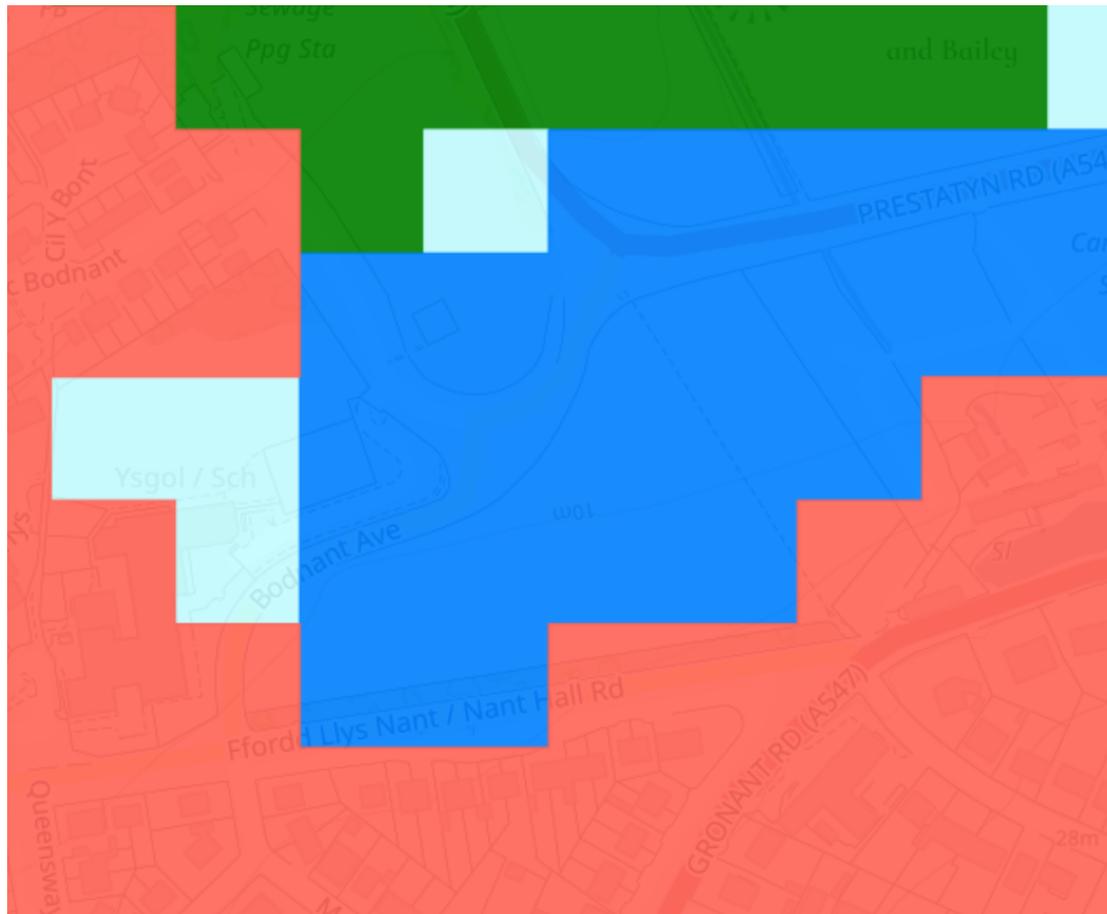
Locational Sustainability

- 6.71. As demonstrated within Section 2 of this Statement, the Site evidently occupies a sustainable location. It benefits from good access to local services and amenities, and local bus services. It is well-connected via the existing footpath network within the settlement. The wider economic, social, environmental and cultural well-being benefits of the proposed development are considered in Section 7 of this Statement.

Best and Most Versatile Agricultural Land

- 6.72. The Site is identified on the Welsh Government Predictive Agricultural Land Classification Mapping as comprising Grade 1 and Urban agricultural land. This is shown on **Figure 5** below:

Figure 5: Predictive Agricultural Land Classification of Site



- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Non Agricultural
- Urban

Source: DataMap Wales

- 6.73. As part of this Application, Land Research Associates have established that the Site comprises 1.56 hectares of Grade 2 agricultural land and 0.75 hectares of subgrade 3a agricultural land.
- 6.74. Turning to paragraph 3.59 of PPW12, this states:

“When considering the search sequence and in development plan policies and development management decisions, considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice

between sites of different grades, development should be directed to land of the lowest grade.”

6.75. Based on the above, it is clear that PPW12 does not strictly preclude the development of best and most versatile agricultural land. Instead, it is necessary to satisfy the tests set out within paragraph 3.59; we undertake this exercise below:

a) There is an overriding need for the development;

6.76. It has been demonstrated within this Statement that there is a significant affordable housing need both in Denbighshire County and locally that simply will not be met without the release of greenfield land. This was demonstrated through the proposed Bodelwyddan Strategic Site allocation, which has failed to deliver any new homes.

6.77. The Site, as land in the open countryside adjacent to the settlement boundary of Prestatyn, carries less protection value than other greenfield land around the County some of which is designated as Green Barrier. Moreover, the Site is not a valued landscape and is not subject to any such designations/protections.

6.78. Given the identified affordable housing needs set out within this Statement and the accompanying Affordable Housing Statement, it is considered that the delivery of affordable housing should be viewed as a **significant priority** for the Council. The loss of 1.56 hectares of Grade 2 best and most versatile agricultural land and 0.75 hectares of subgrade 3a agricultural land would not have a significant impact on the quantum of such land availability in Prestatyn nor around Denbighshire County based on the Welsh Government's ALC Mapping (and the amount of Grade 1, Grade 2 and Grade 3a land which is identified).

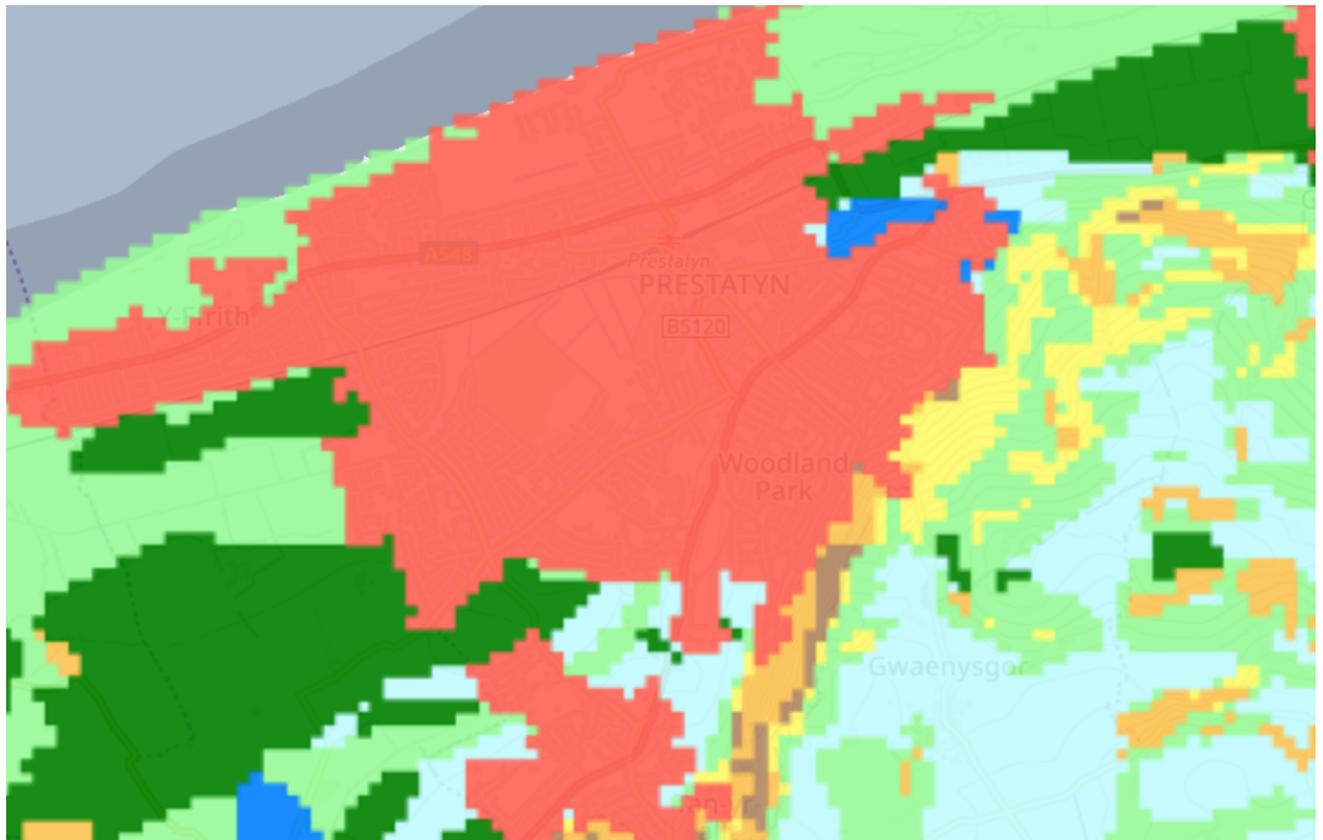
6.79. Whilst the loss of best and most versatile land is a material planning consideration, so too is a community's need for affordable housing consistent with paragraph 4.2.25 of PPW12; in the case of this Application, the delivery of 62 no. affordable homes to meet an identified need and housing shortfall is considered to significantly outweigh any harm arising from the loss of a single, contained parcel of agricultural land.

b) And, either previously developed land or land in lower agricultural grades is unavailable or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

6.80. There is no previously developed land reasonably available in Prestatyn capable and available of meeting the outstanding affordable housing needs of the town.

6.81. Furthermore, the ALC Mapping published by Welsh Government clearly demonstrates that there is no land of a lower agricultural grade available at the edge of the settlement boundary of Prestatyn to meet this need that lies outwith the Green Barrier. This is shown on the extract below at **Figure 6**:

Figure 6: Predictive Agricultural Land Classification of Prestatyn



- Grade 1
- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Grade 5
- Non Agricultural
- Urban

- 6.82. Whilst it is acknowledged that PPW12 is a material planning consideration when it comes to the loss of best and most versatile agricultural land, the same applies in respect of meeting a community's affordable housing needs as per paragraph 4.2.25 of PPW12. For the purposes of this Application, the policy exceptions set out in paragraph 3.59 of PPW12 are considered to be satisfied to justify the proposed development of the Site in question.
- 6.83. The Council clearly needs to balance the importance of meeting affordable housing needs and the historic shortfall in housing delivery against the cumulative loss of 2.31 hectares of best and most versatile agricultural land; however, given the lack of any sequentially preferable sites, it is unclear how the outstanding County-wide and local affordable housing needs will otherwise be met, particularly given the ongoing absence of a new LDP.
- 6.84. It is the Applicant's position that the proposed development satisfies the requirement of paragraph 3.59 of PPW12.

Layout and Design

- 6.85. 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 neighbouring residential properties, the Touring Caravan Park and heritage assets), policy requirements (i.e. road widths, visibility splays, pedestrian footways) and technical considerations (impact on protected trees, ecological features of value). A mitigation by design approach has been adopted in the preparation of the Proposed Site Layout, taking account of each of the above in order to minimise the degree of any harm.
- 6.86. This has informed the preparation of a layout which will have limited harm existing protected trees within the Site as well as the residential amenity of neighbouring residents, and the setting and significance of heritage assets including the Conservation Area and nearby listed buildings. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards.
- 6.87. The house types, plot sizes and proposed palette of materials are considered to be appropriate and proportionate to the Site and its location/surroundings. The layout will also allow for natural surveillance within the Site from properties with a view to designing out crime.
- 6.88. Each property is designed to allow for access by people of all abilities. This will ensure barrier free environments.
- 6.89. The proposed dwellings will be built to Development Quality Requirements and space standards, offering flexibility for the lifetime of the buildings. A series of sustainability measures are also proposed, as documented in Section 4 of this Statement.
- 6.90. 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, Residential Development, Residential Design Guide and Residential Space Standards SPGN's, TAN12, and PPW12.

Landscaping and Public Open Space

- 6.91. As documented in Section 4 of this Statement, a Landscape Plan has been prepared and is submitted with the Application; this provides details of the Applicant's intentions to provide new tree and hedgerow planting across the Site. They also provide details of the proposed boundary treatments within and at the perimeter of the Site, and the hard landscape treatments/surfacing.
- 6.92. The provision of new soft landscaping is considered to represent a significant benefit of the proposed development which should be afforded significant weight. A Landscape Aftercare Plan/Management and Maintenance Plan is considered to be capable of being secured by way of planning condition(s).
- 6.93. The proposed development will incorporate c. 2,360 square metres of formal public open space, and a further 1,460 square metres of amenity space, accessible to all future residents. The quantum of open space aligns with the Council's policy requirements.
- 6.94. Each of the proposed dwellings will benefit from its own private outdoor garden space.
- 6.95. In addition to the Landscape Plan, a Green Infrastructure Statement has been prepared and is submitted as part of the Application. This has demonstrated how the design development process has taken a step-wise approach to the provision of green infrastructure as part of the proposed

development and documents the habitats to be provided. This includes details of the number of planted trees, shrub planting, hedgerows, grassland and bird and bat boxes amongst others.

- 6.96. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1 and BSC4, the Recreational and Open Space SPGN, TAN16, and PPW12.

Highways, Road Safety and Car Parking

- 6.97. The only vehicular access into the Site will be secured through the creation of a new junction from Bodnant Avenue at the north-western edge of the Site; this will also provide for safe pedestrian and cycle access.
- 6.98. The Site access and internal road widths are compliant with the Council's design standards as documented in Section 4 of this Statement. The internal road layout has been designed to ensure the safe manoeuvring of a refuse vehicle, together with swept path analysis contained in the accompanying Transport Statement.
- 6.99. In view of the Site's locational sustainability, the Applicant has been keen to provide for the safe movement of pedestrians within the Site and to provide connections to the surrounding pedestrian network. This is reflected in the Proposed Site Plan.
- 6.100. In respect of car parking provision within the Site, the Applicant has been guided by and is broadly compliant with the Council's parking standards as documented in Section 4 of this Statement. This is considered appropriate when taking into account the sustainable location of the Site and access to existing and proposed public transport, walking and cycle provision as documented in Sections 2 and 4 of this Statement and the accompanying Transport Statement. The proposed development seeks to both facilitate and encourage sustainable modes of travel, reducing reliance on the private car, through the provision of dedicated footway connections.
- 6.101. The accompanying Transport Statement submitted with the Application has assessed the potential impacts of the proposed development on the highway network and road safety. This has established that the proposed development is estimated to generate a total of 31 two-way vehicle movements in the AM peak hour and 33 two-way vehicle movements in the PM peak hour. The Transport Statement has concluded that this increase in traffic will not have a material detrimental impact on the operation of the local highway network.
- 6.102. 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 Parking Requirements in New Developments SPGNs, TAN18, and PPW12.

Heritage

- 6.103. Given the location of the Site within the Prestatyn Castle Mound and Nant Hill Conservation Area, and its close proximity to the Grade II listed Nant Mill and Prestatyn Castle Scheduled Monument, a Heritage Impact Assessment has been prepared and is submitted as part of this Application.
- 6.104. This has concluded as follows:
- The assessment has identified that the significance of Prestatyn Castle is primarily derived from its surviving earthworks and archaeological potential, and that its setting has evolved over time to include a mix of open land, infrastructure and modern development. The

proposed development will not result in harm to the significance of the Scheduled Monument;

- The significance of Nant Mill is enshrined its architectural, historical and evidential value as a former water-powered industrial complex, with its immediate and functional setting focused on the mill building, millpond and associated structures. The proposed development will result in a limited degree of harm to its wider setting through the partial loss of views across adjacent open land. However, its immediate setting and the key elements which underpin its significance will remain intact; and
- The Prestatyn Castle Mound and Nant Hill Conservation Area derives its significance principally from Prestatyn Castle, Nant Mill and their immediate surroundings, together with elements of the surrounding landscape. The Site contributes to the character of the designated area as open land with established vegetation, but this contribution is limited and not fundamental to its significance.

6.105. In summary, it has been concluded that the proposed development will result in a degree of harm to the significance of the Prestatyn Castle Mound and Nant Hill Conservation Area through the loss of open land and a change in character within part of the designation. This harm is localised in nature and does not affect the key elements which underpin its significance. The proposed development incorporates mitigation measures, including the retention of boundary vegetation, areas of open space and a landscape-led design approach, which reduce the extent of harm.

6.106. The proposed development will deliver a number of social and economic benefits which collectively constitute public benefits. These are documented in Section 7 of this Statement. In the overall planning balance, the weight to be attached to the public benefits of the proposed development are considered to outweigh the harm identified as part of the Heritage Impact Assessment.

6.107. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policies RD1 and VOE1, SPGN – *Conservation Areas*, TAN24 and PPW12.

Nature Conservation

6.108. A Preliminary Ecological Appraisal has been undertaken across the Site. In doing so, this has identified the following:

- The proposed development will not result in any direct effects on the statutory designated sites, the nearest is The Dee Estuary SPA, Ramsar, and SSSI sites, located approximately 400 m northeast. Construction operations will not encroach upon these sites;
- The Gronant Dunes Local Nature Reserve (LNR) is located approximately 900m north of the site, given this distance, no effects on the LNR are anticipated;
- There is a pond located 50m east of the Site, which had an average HIS score, indicating potential connectivity to the site via grassland, hedgerows, and scrub habitats;
- No evidence of badger was noted during the extended Phase 1. No effects on badgers are envisaged;
- There is one building on the Site (sub-station) which has been characterised as having moderate potential for roosting bats to be present;
- No evidence of any Schedule 1 bird species was observed at the Site during the survey work;
- The surveyed area may be used by hedgehogs for foraging, nesting, and dispersal into the wider landscape. The proposed development could result in the direct loss of foraging and

nesting habitat, and isolate hedgehog populations, restricting their access to food and mates;

- The area of grassland to be affected by the proposed construction is of low biodiversity value, being predominantly improved grassland. Consequently, there is no significant effect on invertebrates, most of which would likely re-colonise within gardens and the public open areas upon the completion of the proposed development;

- 6.109. The Assessment has concluded that the proposed development will not have any direct or indirect impacts on statutory designated sites.
- 6.110. Following the recommendations of the Preliminary Ecological Appraisal, bat surveys have been undertaken, the conclusions of which are set out in the accompanying Bat Survey Report. This has established that no bats were observed emerging from the existing sub-station building on the Site. However, the surveys did confirm that bats were actively commuting and foraging in the immediate vicinity along the existing treeline adjacent to Nant Hall Road. As a result of this analysis, a set of appropriate mitigation measures has been developed to ensure the protection of the bat populations and their habitats.
- 6.111. The submitted Green Infrastructure Statement contains a Biodiversity Statement at Section 5, documenting how the proposed development is capable of supporting wildlife and achieving an overall net gain over the existing baseline position through the various landscape and green infrastructure measures that are proposed.
- 6.112. The Assessment provides details of a number of recommendations; avoidance, mitigation, compensation/enhancements measures. This includes the provision of bird and bat boxes and appropriate boundary fencing. A number of these measures can be secured by way of planning condition, including a Construction Ecological Management Plan if deemed necessary.
- 6.113. Subject to following the guidance contained in the Assessment, 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 PPW12. It will not have an adverse impact on protected species.

Trees and Hedgerows

- 6.114. A Tree Survey has been undertaken across the Site and is submitted with the Application. This has assessed the quality of the existing tree and hedgerow species around the Site.
- 6.115. This Survey has identified 95 no. trees along the southern edge of the Site.
- 6.116. Of these, 15 no. were identified as Category A, 56 no. as Category B, 21 no. as Category C and 3 no. as Category U.
- 6.117. Trees T50, T58, and T72 are recommended for removal owing to their poor condition and given the absence of any bat roosts as documented above.
- 6.118. Some existing vegetation/hedgerow along the Site frontage on Bodnant Avenue will need to be removed to accommodate the proposed new vehicular access.
- 6.119. In addition to the existing trees and hedgerows, additional soft landscaping will be provided as shown on the submitted Landscape Plan.

6.120. Accordingly, and based on the recommendations of the Assessment, the proposed development is considered to be consistent with Local Development Plan Policy RD1, the Trees and Landscaping SPGN, TAN5, and PPW12.

Welsh Language

6.121. A Community and Linguistic Impact Assessment has been prepared and is submitted with this Application. Whilst it is not the intention to repeat the full content of the Assessment here, in summary the Assessment has established that:

- The proposed development, given its modest scale and proposed tenures aimed to provide local people with access to an affordable home, has an opportunity to have a neutral to minor positive impact on the community characteristics of existing Welsh speakers;
- The proposed development will deliver a range and choice of housing to meet a diversity of local needs and achieve age structure balance and affordable housing; and
- A number of enhancement and mitigation measures could be provided as part of the proposed development, including a Welsh street name and bi-lingual signage, and the local advertisement of the proposed dwellings in Welsh and English which, together with the proposed delivery of affordable housing, could encourage local people to remain living within the area.

6.122. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policy RD5, SPGN – *Planning and the Welsh Language*, TAN20 and PPW12. The proposed development would not cause significant harm to the character and language balance of the community of Prestatyn.

Flood-Risk and Drainage

6.123. As documented in Section 2 of this Statement, the majority of the Site lies in Flood Zone 1. The northern most part of the Site is located in Flood Zones 2 and 3, at risk of sea flooding.

6.124. Given the location of a small part of the Site within Flood Zones 2 and 3, no built development is proposed in that location.

6.125. 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. Details are set out in Section 4 of this Statement. This will ensure that the proposed development will not exceed the greenfield run-off rate and use SuDS to ensure that flood-risk is not increased on, adjacent or downstream of the Site.

6.126. Reference should be had to the accompanying Flood Consequences Assessment for full details, which includes a detailed consideration of the risk to life, disruption to people living and working in the area, impact on flood risk generally, and disruption to the sustainable management of resources.

6.127. Accordingly, and subject to the recommendations set out in the Strategy, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policy VOE6 and PPW12.

Ground Conditions

- 6.128. Given the nature of the proposed land-use, and the existing greenfield nature of the Site, a Phase 1 and 2 Geo-Environmental Report has been prepared and is submitted within the Application. This has assessed the potential for existing/future sources of ground contamination on the Site, including desktop and intrusive investigations. In summary, it has established the following:
- The Site is an agricultural field. Made ground was not observed during the ground investigation;
 - No ground gases have been identified on the Site. Basic radon protection measures are required; and
 - The Site is within the Intermediate Radon Potential Area; basic radon protection measures are likely to be required to satisfy planning conditions.
- 6.129. No contamination sources have been identified that would pose a significant risk to controlled waters, nor to the proposed residential end-use.
- 6.130. Table 11 of the Phase 1 and 2 Geo-Environmental Report has concluded that the potential risk of contamination from various sources is no more than low to negligible, with the exception of radon gas from natural ground classified as medium to high.
- 6.131. The Report contains a number of recommendations which should be adhered to in the event that the proposed development does proceed.
- 6.132. Accordingly, the proposed development is considered to respond positively to and is consistent with Local Development Plan Policy VOE6, SPGN Residential Development, and PPW12.

Planning Conditions

- 6.133. 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, amongst others:
- Drainage (surface water and foul water);
 - Materials;
 - Affordable Housing;
 - Construction and Environmental Management Plan, including details of construction hours and dust management;
 - Landscaping (hard and soft), including tree planting;
 - Tree protection measures during construction;
 - Reasonable avoidance measures (as per the recommendations of the Extended Phase 1 Habitat Survey);
 - Ecological enhancement measures, as documents in the Preliminary Ecological Appraisal and Green Infrastructure Statement; and
 - Street lighting.

Planning Obligations

- 6.134. 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 and 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.
- 6.135. Any requests for financial contributions, including education, which are 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 PPW12.

Social Benefits

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

- The delivery of 62 no. new affordable homes, 100% of the proposed development consistent with LDP Policy BSC8. These will comprise a balanced mix of 1, 2, 3 and 4 bedroom homes responding to the findings of the LHMA 2019 and the latest SARTH and Affordable Housing (Tai Teg) Housing Registers, and which will be accessible by local people. The dwellings will be split 64%/36% between social rented and intermediate rented tenures. The delivery of these affordable homes which should be afforded *significant weight* in favour of the proposed development and which is a material planning consideration;
- The proposed development will not give cause to any harm to the role and function of Prestatyn as a *Lower Growth Town*, reflective of its standing in the LDP settlement hierarchy;
- The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density of 25 dwellings 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 Council's LDP, SPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW12;
- The scale and nature of the proposed development will not pre-determine or prejudice the emerging Replacement LDP which remains some time from adoption, and there is no strategy in place at this time to address the ongoing shortfall in view of the time-expired nature of the adopted LDP. The proposed development would not be premature; and
- A scheme which is capable of being delivered within at least 24 months from commencement of development, making an immediate contribution towards identified affordable housing needs.

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 62 no. proposed new dwellings;

- Gross Value Added to the local economy generated by future residents of the proposed development; and
- Contribution to local education and off-site open space provision where this is justified by up-to-date evidence.

Environmental Benefits

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

- Existing protected trees and hedgerows at the perimeter of the Site will be retained, alongside new tree planting which could provide the opportunity to achieve secure net gains in biodiversity. These are committed to by the Applicant in the accompanying Landscape Plan and Green Infrastructure Statement;
- The proposed development will not give cause to the loss of any features of significant ecological value, nor cause harm to any protected species, and the proposed layout has been designed to retain and protect the Site's areas of ecological value. The accompanying Green Infrastructure Statement documents how the proposed development is capable of achieving a net gain in biodiversity;
- The use of Sustainable Urban Drainage Systems which will not increase or exacerbate flood-risk elsewhere;
- Development on a sustainable site which, through the inclusion of safe pedestrian routes/footways, 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 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 not have a material detrimental impact on the operation of the local highway network;
- The proposed development will not have a significant adverse impact either visually or on the local landscape, read against the backdrop of existing residential development, Bodnant Community School and road infrastructure which together have an urbanising influence on the Site;
- The proposed development will not give cause to any adverse impacts in relation to noise, contamination, human health, and air quality/odour;
- It has been demonstrated that the proposed development would satisfy the exceptions set out in paragraph 3.59 of PPW12, balanced against the requirements of paragraph 4.2.25 of PPW12 and the material weight to be given to the delivery of affordable housing. The loss of 2.31 hectares of greenfield land would not result in a shortage of Best and Most Versatile Agricultural Land around Prestatyn nor across the wider County of Denbighshire;
- The submitted Utility Survey demonstrates that there is sufficient capacity in the electricity and clear water networks to accommodate the proposed development; and

- The proposed development will provide for the construction of energy efficient homes as part of its sustainability credentials.

Cultural Well-Being

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

- The Applicant recognises the need to safeguard the Welsh language to encourage and provide for its use, consistent with Local Development Plan Policy RD5, SPGN – *Planning and the Welsh Language*, TAN 20 and PPW12. The Applicant recognises that the proposed development presents the opportunity for a neutral to minor positive community and linguistic impact. The Applicant is agreeable to the provision of bilingual signage within the proposed development amongst other measures such that the proposed development can support and sustain the Welsh language within the local community;
- The proposed development will cause no harm to the Prestatyn Castle Scheduled Monument; a limited degree of harm to the Grade II listed Nant Mill; and a degree of harm to the significance of the Prestatyn Castle Mound and Nant Hill Conservation Area. A mitigation by design approach has been adopted in the formulation of the proposed development, and the public benefits associated with the proposed development are considered to outweigh the extent of the harm identified;
- 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.

Public Benefits

7.6. Taking account of all of the above social, economic, environmental and cultural well-being benefits, collectively the proposed development will generate a number of public benefits, namely:

- The delivery of much-needed new affordable homes in the Ward of Prestatyn East, in response to identified affordable housing needs in the locality;
- The delivery of a mix of house types, sizes and tenures in response to the housing needs that have been identified;
- The creation of employment opportunities during the construction phase, as well through additional local expenditure creating job opportunities in local services and the wider supply chain;
- The provision of public open space and amenity space within the Site for the recreational and leisure enjoyment of local residents, alongside the provision of private garden spaces. The location of the public open space maintains a physical separation between the proposed development and the Prestatyn Castle Scheduled Monument;
- The retention of existing, established landscape features at the perimeter of the Site, along the provision of new soft landscaping features which can help secure a net biodiversity benefit; and

- The ability to deliver a neutral to minor positive impact in respect of the Welsh Language by providing new affordable housing for local people, enabling them to remain living within Prestatyn.

7.7. The public benefits of the proposed development are collectively considered to attract **very significant positive weight** in the overall planning balance.

8 CONCLUSIONS AND PLANNING BALANCE

- 8.1. This Statement is submitted in support of a detailed Application for the proposed development of Land off Bodnant Avenue, Prestatyn.
- 8.2. The description of development for which detailed planning permission is sought is:
- “Erection of 62 no. dwellings and associated infrastructure works comprising access, landscaping, drainage and open space provision; a sub-station; and a pumping station”***
- 8.3. This Statement has demonstrated that the proposed development is consistent with relevant policies contained within the LDP insofar as they remain consistent with national planning policy set out in PPW12. as well as other material considerations.
- 8.4. Whilst it is noted that residential development on the Site is contrary to the open countryside designation of the Site, there are considered to be a number of material planning considerations which weigh in favour of the proposed development as documented in Section 6 of this Statement. Given the time-expired nature of the LDP, and the continued absence of a Replacement LDP, there is a need to ensure that new housing continues to come forward in the most sustainable areas of the County to meet the ongoing housing needs; in particular, affordable housing given the affordability issues documented earlier in this Statement. This is all the more important in view of the historic shortfall in housing delivery across the County during the now time-expired LDP plan period 2006 and 2021.
- 8.5. The proposed development will deliver a well-balanced mix of much-needed new affordable housing provision in a Lower Growth Town. The proposed housing mix responds to genuine evidence of affordable housing needs and is immediately deliverable by Adra with access to grant funding.
- 8.6. The proposed development will represent a logical extension to the town of Prestatyn towards its eastern edge delivering a balanced mix of much-needed, high-quality affordable homes which provides for the efficient and sustainable use of the land.
- 8.7. The proposed development will deliver a well-balanced mix of much-needed new affordable housing provision, with 95% of the proposed dwellings comprising 3 or fewer bedrooms. Accordingly, the proposed housing mix responds to genuine evidence of affordable housing needs and is immediately deliverable by Adra (Tai) Cyfyngedig with access to grant funding.
- 8.8. In respect of the technical considerations assessed in Section 6 of this Statement, the proposed development will not give cause to any harmful adverse technical and environmental impacts.
- 8.9. 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 PPW12.
- 8.10. In determining this Application and assessing the compliance of the proposed development with the development plan, it is considered that the following weighting should be applied in the overall *planning balance*:
- In respect of the weighting to be applied in the determination of this Application, it is considered that the proposed development should attract **very significant weight** for the delivery of a balanced mix of 62 no. new affordable homes responding to the significant

affordable housing need at a local and County-wide level, consistent with Policy BSC/8 of the development plan and paragraph 4.2.25 of PPW12;

- **Positive weight** should be afforded to the efficient use of a greenfield parcel of land at the edge of the defined settlement boundary of Prestatyn, in a sustainable location, to deliver much-needed new affordable homes. The density of development, at 25 dwellings per hectare, is proportionate to the Site and the settlement in this location taking account of key considerations in respect of tree root protection, accessibility, drainage/flood-risk and heritage;
- **Positive weight** should be attached to the ability to deliver 62 no. high-quality dwellings and a sustainable living environment consistent with development plan Policy RD1, ensuring that the scale, design and siting of the proposed dwellings will conserve the settlement's character and setting, and that the proposed dwellings are of an appropriate and sensitive siting, scale and design so not to unduly harm the character and appearance of the Prestatyn Castle Mound and Nant Hill Conservation Area and other nearby heritage assets such that this would be a determinative factor weighing against the proposed development. The proposed development is capable of assimilating comfortably with the surrounding context and local landscape;
- **Moderate weight** should be attached to the associated economic benefits of the proposed development;
- **Moderate weight** to the biodiversity net gain and hedgerow gain that is capable of being achieved on the Site, in line with the development plan and national planning policy/legislative requirements;
- **Moderate weight** to the provision of green infrastructure, ecological enhancement and public open space that is capable of being provided within the Site, integrated as part of the proposed development, full details of which can be secured by way of planning condition;
- **Moderate weight** should be attached to the potential neutral to minor positive impact on the Welsh Language;
- **Moderate Weight** should be afforded to the localised degree of harm to the Prestatyn Castle Mound and Nant Hall Conservation Area, the impact on which has been mitigated by design, and the limited degree of harm to the Grade II listed Nant Mill. The public benefits associated within the proposed development, alongside the wider social, economic, environmental and cultural well-being benefits, are considered to outweigh the harm that has been identified within the Heritage Impact Assessment;
- **Limited weight** should be afforded to the spatial and visual change arising from the proposed development, owing to the proposed extent of the identified developable area (informed by the Site levels and landscape and visual impact considerations), and the location of the Site adjacent to existing and permanent built form and road infrastructure which serve as significant urban influences and a backdrop to the Site. The proposed development will not result in any major adverse effects visually or on the landscape. The ability to address the significant affordable housing shortfall in Denbighshire County will inevitably require the release of greenfield land, and there is no land within the settlement boundary of Prestatyn to make any significant and worthwhile contribution towards this shortfall; and

- **Limited weight** to the loss of Grade 2 and Subgrade 3a best and most versatile agricultural land when balanced against the wider social, economic and environmental benefits set out in Section 7 of this Statement.

8.11. In the overall planning balance, the proposed sustainable development is considered to be acceptable, collectively delivering social, economic, environmental, cultural well-being and public benefits; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with Local Development Plan Policy RD1 and paragraph 1.18 of PPW12.

