

Leader, Cabinet Member, Chief Executive Denbighshire County Council.

Cc Countryside Commission for Wales (AONB Chief Officer)

NFU

Welsh Farmers Union

Natural Resources Wales

Wildlife trust

Dear Sir/Madam

VIEWS AND CONCERNS OF THE COMMUNITY COUNCIL ABOUT POSSIBLE GYPSY SITES IN TREMEIRCHION, WAEN AND CWM COMMUNITY

Three sites have been identified between Waen and Rhuallt

REVIEW OF KEY RELEVANT LOCAL POLICIES 22.11.19

Denbighshire County Council Local Development Plan 2006 – 2021 adopted 4th June 2013

The County Council is considering sites for Gypsy and traveller caravan sites outside of their current priority criteria within the current Local Development Plan viz:

- The sites are viewable from the overlooking Moel Maenefa summit and the Offa's Dyke National Trail and the sites are in the setting of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty.
- The sites in TCWCC are not located within or on the outskirts of an established settlement boundary with access to a range of facilities/services (including schools), public transport and main transport routes;
- The sites are remote from local services. The nearest shop is 3 miles distance. The nearest surgery is 3 miles away. The nearest primary school is 3 miles away. The nearest secondary school is 5 miles away.
- There is marginal public transport provision. Bus service No 40 has been terminated. Taxi bus available "On request only" for two services per week only.
- The development will create a demand for additional school places locally; the schools within the immediate community are substantially over-subscribed. The implications for transporting pupils further afield should be taken into account.
- The implications on school performance require to be taken into account, eg through absenteeism records being elevated over and above acceptable levels.
- The proposal would be detrimental to the occupiers of adjacent properties, extending from residential, to commercial including tourism development, as at The Whitehouse Restaurant ad Rooms and Rhuallt Country Park.

Very concerning that the Council is considering sites for Gypsy and traveller caravan sites outside of Sustainable development and good standard design criteria within the current Local Development Plan viz:

- The developments will unacceptably affect the amenity of local residents, other land and property users or characteristics of the locality by virtue of increased activity, disturbance, noise, dust, fumes, litter, drainage, light pollution etc.,
- The developments do not provide safe and convenient access for disabled people, pedestrians, cyclists, vehicles and emergency vehicles together with adequate parking, services and manoeuvring space.

- The developments do have an unacceptable effect on the local highway network as a result of congestion, danger and nuisance arising from traffic generated.
- The developments do prejudice land or buildings safeguarded for other uses, or impair the development and use of adjoining land
- The developments disregard personal and community safety and security and has no regard to implications for crime and disorder

CLWYDIAN RANGE AND DEE VALLEY AONB MANAGEMENT PLAN

PCP2 - To protect the AONB from development within and around the area that will harm the special character of the area and its setting, and to resist proposals that impact adversely on the special qualities or features of the AONB. The developments will harm the special character of the area and its setting.

DENBIGHSHIRE LOCAL DEVELOPMENT PLAN 2018- 2033 DRAFT PREFERRED STRATEGY May 2019

- There is no successor policy, to date, to the existing LDP Policy BSC 10 – Gypsy & Traveller Sites Proposals for gypsy and traveller caravan sites.
- The inland corridor route along the A55 between Denbighshire County Council west and east boundary is 8 miles – the shortest cross section of any county in North Wales, yet it is proposed to locate two Gypsy & Traveller sites within close proximity, thus creating a far higher density of such provision within a rural and poorly serviced community. This will create a burden on public infrastructure in the immediate community. There is no new provision on the coastal corridor route ie A548 to North Wales.
- The Preferred Strategy will make provision for a level of growth comprising 68 ha of employment land to accommodate a forecasted land requirement of 47.6 ha. This will be supported by land for 3,775 new homes to meet a housing requirement of 3,275 dwellings. The general direction is to develop residential accommodation within Bodelwyddan and the main townships of Denbighshire. It is not supportive of the development of residential accommodation in Open Countryside, per the location of 2 of these sites
- LDP Sustainable Settlement Hierarchy Tiered Approach identifies residential development predominantly in locations defined as: Main centre, Local centre, Village, and not in Unserviced Village, Open Countryside. Waen is defined as in Open Countryside. Rhualt is defined as an Unserviced Village. Why therefore should new residential development for Gipsy and Traveller Sites be located outside of the hierarchical locations of Main centre, Local centre, Village?

The Community Council is most concerned that these sites have hit the press prior to any communication with us at all and there appears to be behind closed doors discussions, which lacks transparency and is alien to good governance practice indeed possibly ultra vires. We feel that there has been insufficient time to debate this and that key meetings planned or taking place should be publicly available.

County and Community Councils are supposed to be partners in the public sector and in the locality, we are therefore bemused and very disappointed at this turn of events and would therefore urge you as our Unitary Authority to think very carefully about how you handle things from now on. There are many opposition groups setting up as I write and I am sure these groups will ensure a long and bitter fight in opposition to a positive vote for these sites. We would expect

to be kept informed of any developments and asked our opinion on any courses of direction in this matter.

Please respond when you have the opportunity to do so.

Yours faithfully

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