



**CUSHMAN &
WAKEFIELD**

Private & Confidential
www.cushmanwakefield.com

Community & Linguistic Impact Assessment

DENBIGHSHIRE COUNTY COUNCIL

September 2020

Contents

1.0	Introduction	1
2.0	Proposed Development	3
3.0	Planning Policy Context	5
4.0	Welsh Language Profile	6
5.0	Methodology	8
6.0	Conclusion	12

Disclaimer

This report should not be relied upon as a basis for entering into transactions without seeking specific, qualified, professional advice. Whilst facts have been rigorously checked, Cushman and Wakefield can take no responsibility for any damage or loss suffered as a result of any inadvertent inaccuracy within this report. Information contained herein should not, in whole or in part, be published, reproduced or referred to without prior approval. Any such reproduction should be credited to Cushman and Wakefield.

1.0 Introduction

1.1 This Community and Linguistics Impact Assessment has been prepared by Cushman & Wakefield on behalf of Denbighshire County Council ('the applicant') in support of a hybrid planning application for:

“Detailed planning permission for Queens Market accommodating a Food and Market Hall, Multi-purpose Events Space, and Shared Service Core, associated public realm and infrastructure, the refurbishment of the Queens Chambers building, Sussex Street, and the demolition of the Bright Spot building, West Parade/High Street and adjacent property at 2-6 High Street.

Outline planning permission for up to 80 apartments, 1,804sqm of A1/A3/A4 floorspace, 540sqm of D1 floorspace, and 5,794sqm of B1 office floorspace on land at Queens Market, Rhyl.”

1.2 A Community and Linguistic Impact Assessment has been requested by the Local Planning Authority as part of the validation process for the planning application and in order to comply with Local Development Plan **Policy RD5**.

1.3 *Policy RD5 – The Welsh language and the social and cultural fabric of communities:*

In determining all planning applications, the needs and interests of the Welsh language will be taken into account. Development could be refused if its size, scale or location would cause significant harm to the character and language balance of a community. To be able to make an informed decision on applications that may have an effect on the future of the Welsh language within communities, applicants will normally be expected to submit a:

- i) Community Linguistic Statement to accompany a planning application for smaller developments within villages, hamlets or the open countryside comprising proposals of the following kind: 5 residential units or more, commercial, industrial or leisure/tourism development with a floor area of 1000m² or more, development likely to lead to the loss of community facilities or employment opportunities, infrastructure projects with long term community impacts;*
- ii) More detailed assessment in the form of a “Community and Linguistic Impact Assessment” to accompany a planning application in all settlements where developments are on a larger scale comprising proposals of the following kind: 20 residential units or more, commercial, industrial or leisure/tourism development with a floor area of 3000m² or more, large scale infrastructure projects with long term community impacts.*

1.4 Prior to this report being prepared, it has been agreed with the Local Planning Authority that due to the scale and nature of the proposal a full Community and Linguistics Impact Assessment is required to accompany the planning application.

1.5 This report should be read in conjunction with all other planning documents submitted with the application.

1.6 This Statement is structured as follows:

- **Section 2: Proposed Development;** describes the proposed development;
- **Section 3: Planning Policy Context;** Identification of the relevant local and national planning policies;
- **Section 4: Welsh Language Profile;** Demonstrates the current usage of the Welsh language within the development site area.

- **Section 5: Methodology;** Poses a series of questions to demonstrate the level of impact from the application on the use of the Welsh language.
- **Section 6: Conclusion;** Summarises the contents of this Statement.

2.0 Proposed Development

2.1 The description of the proposed development is as follows:

“Detailed planning permission for Queens Market accommodating a Food and Market Hall, Multi-purpose Events Space, and Shared Service Core, associated public realm and infrastructure, the refurbishment of the Queens Chambers building, Sussex Street, and the demolition of the Bright Spot building, West Parade/High Street and adjacent property at 2-6 High Street.

Outline planning permission for up to 80 apartments, 1,804sqm of A1/A3/A4 floorspace, 540sqm of D1 floorspace, and 5,794sqm of B1 office floorspace on land at Queens Market, Rhyl.”

2.2 The development is to be delivered across three distinct phases. The three phases are illustrated by separately submitted **drawings (PH)001, (PH)002, and (PH)003** and further detail is provided in the separately submitted DAS.

2.3 In summary, the first phase will include the new Queens Market and Multi-purpose Events Space alongside the shared service core, associated public realm/infrastructure and refurbishment of the Queens Chambers building. Funding from the Welsh Government has been secured to deliver phase 1, which is why these elements of the proposal are applied for in detail. The remainder of the proposals will make up phases 2 and 3 and are therefore applied for in outline. They will be the subject of future detail design and subsequent reserved matters planning applications.

2.4 The different elements and quantum of development is summarised in table 1 below and should be read in conjunction with **drawing (00)105 GA Proposed Site Plan** to identify where these different uses are located on the site.

Land Use	Use Class	Quantum
Detailed application components		
Market Hall	A1/A3	975 sqm
Event Space (including shared service core with Market Hall)	D2	873 sqm
Queens Chambers (refurbishment & new internal storage area)	A1/B1	380 sqm
Main Square / West Parade Square	N/A	2,450 sqm
Temporary Landscaping (including small extension to Queen St temporary car park	N/A	3,205 sqm
Outline application components (principle of this use and quantum of development)		
Office Space	B1	Up to 5,794 sqm
Library	D1	Up to 540 sqm
Residential	C3	Up to 80 units
Commercial floorspace (A1, A3, A4)	B1	Up to 1,804 sqm
Garden Square / Queens Market Street / West Parade	N/A	2,320 sqm

Table 1: Application components and quantum of development

2.5 Chapter 3 of the separately submitted Planning Statement provides greater detail on the proposed development.

3.0 Planning Policy Context

Introduction

- 3.1 The adopted development plan for Rhyl currently comprises the adopted Denbighshire County Council Local Development Plan (2013). An emerging Local Development Plan is currently under preparation. The plan is proposed to be submitted to the Welsh Government in Autumn 2020, with examination anticipated in 2021, however the current covid-19 crisis is impacting timescales and decision making.
- 3.2 Relevant material planning considerations include Planning Policy Wales (2018), the Technical Advice Notes (TAN) and Supplementary Planning Guidance.

Planning Policy

- 3.3 **Policy RD5 “The Welsh language and the social and cultural fabric of communities”** is contained within the adopted Denbighshire County Council Local Development Plan (2013). The policy requires a Community and Linguistic Impact Assessment to be prepared for developments of 20 residential units or more and commercial, industrial or leisure/tourism development with a floor area of 3000m² or more.
- 3.4 Denbighshire County Council have also published and adopted Supplementary Planning Guidance document ‘**Planning and the Welsh Language (2014)**’. The purpose of the SPG is to provide further advice and guidance on how the Welsh language is to be considered in new development proposals submitted via the planning system. It supplements the adopted Denbighshire Local Development Plan Policy RD5.
- 3.5 The SPG also sets out the requirements of the Community and Linguistics Impact Assessment and poses a series of questions which need to be addressed as part of the assessment.
- 3.6 These questions are assessed in full in Section 5 of this report as well as the proposed mitigation measures included in the development.

4.0 Welsh Language Profile

- 4.1 In order to assess the impact that the development may have on the use of the Welsh language, it is important to understand the existing use of the language within the town. The development site is located in the Rhyl West ward of Denbighshire, Wales.
- 4.2 The data included in this section of the report has been collected from the 2001 and 2011 Census Data from the Office of National Statistics and is included within Tables 1 and 2.

Denbighshire

- 4.3 The 2011 census data identifies that Denbighshire has a population of 90,527 people, of this population, 3.6% (3,251) can speak Welsh. Comparing this data with the figures from 2001 (90,085 aged 3 and over), 3.7% were Welsh speaking. Denbighshire as a county has therefore experienced a decline in its Welsh speaking population of 0.1%.
- 4.4 In 2001, 64% of the Denbighshire population had no knowledge of Welsh. As of 2011 this figure has increased marginally to 64.6%.

Rhyl West

- 4.5 The 2011 census identifies that Rhyl West has a population of 4,135 people, of this population 2.6% (107) can speak Welsh. Comparing this data with the figures from 2001 (4,088 aged 3 and over), 3.2% were Welsh speaking. Rhyl West as a Ward has therefore experienced a decline in its Welsh speaking population of 0.6%.

Knowledge of Welsh	Rhyl West		Denbighshire		Wales	
	Number	%	Number	%	Number	%
All people aged 3 and over	4,135	100	90,527	100	2,955,841	100
Understands spoken Welsh only	154	3.7	7,662	8.5	157,792	5.3
Speaks but does not read or write Welsh	107	2.6	3,251	3.6	80,429	2.7
Speaks and reads but does not write Welsh	46	1.1	1,964	2.2	45,524	1.5
Speaks, reads and writes Welsh	363	8.8	16,842	18.6	430,717	14.6
Other combination of skills	95	2.3	2,368	2.6	73,392	2.5
No knowledge of Welsh	3370	81.5	58,440	64.6	2,167,987	73.3

Table 1: 2011 Census Data

- 4.6 In 2001, 80.9% of the Rhyl West population had no knowledge of Welsh. As of 2011 this figure has increased marginally to 81.5%.

Knowledge of Welsh	Rhyl West		Denbighshire		Wales	
	Number	%	Number	%	Number	%
All people aged 3 and over	4,088	100.0	90,085	100.0	2,805,701	100.0
Understands spoken Welsh only	171	4.2	6,350	7.0	138,416	4.9
Speaks but does not read or write Welsh	129	3.2	3,297	3.7	79,310	2.8
Speaks and reads but does not write Welsh	25	0.6	1,566	1.7	38,384	1.4
Speaks, reads and writes Welsh	352	8.6	18,677	20.7	457,946	16.3
Other combination of skills	103	2.5	2,579	2.9	83,661	3.0
No knowledge of Welsh	3,308	80.9	57,616	64.0	2,007,984	71.6

Table 2: 2001 Census Data

5.0 Methodology

- 5.1 This Section of the statement responds to the questions included in the Planning and the Welsh Language SPG.

Population Characteristics

- 5.2 *Is the development likely to lead to a population increase / decrease that might: Affect the balance of Welsh speakers (positive or negative way); or Lead to an absolute or proportional decline in the number of Welsh speakers?*

The development is likely to stabilise the population within Rhyl as a result of an increase in employment opportunities in the Town. There is also expected to be a small increase in the population in Rhyl West due to residents who may relocate to occupy the new residential apartments.

It is not expected, however, that the increase in population will have any negative affect on the balance of Welsh speakers or lead to a decline in the use of the language.

The proposed new Market Hall will be differentiated from the offer of the current Market Hall by providing a greater focus on local Welsh food produce, which will provide opportunity for new employment opportunities for the local population and will assist in reinforcing the use of the Welsh language.

A number of other factors and measures are proposed and are set out within this statement to support the community and the retention and use of the Welsh language, for example II signage within the site is proposed to be bilingual.

- 5.3 *Is the development likely to lead to increased in-migration?*

The vitality of Rhyl town centre has declined sharply in recent years with the loss to neighbouring towns of national retailers that are regarded as key attractors, a growth in the proportion of empty properties, and a reduction in footfall. The property requirements of businesses in segments of the retail sector which are still growing locally also cannot be met with the stock which is currently available because of its size and quality.

The aim of the Queens Market regeneration project is to improve the vitality of the town centre by providing new premises that meet the needs of businesses who want to locate in the town centre.

Returning this pivotal town centre destination to a productive use will enhance the vitality of the town centre and improve the economic wellbeing of Rhyl generally, which in turn is likely to lead to a small increase in in-migration into the centre.

- 5.4 *Is the development likely to lead to increased out-migration?*

The development is not likely to lead to an increase out-migration. Residents are more likely to stay in Rhyl due to the proposed investment and regeneration of the area.

- 5.5 *Is the development likely to lead to a changing age structure of the community?*

The proposed development will provide a variety of uses within the town centre and will create a lively neighbourhood of restaurants, bars and cafes with a public library, outdoor courtyard and residential units. The development is therefore likely to attract a range of all ages from within the community and will sustain a social balance, making the development sustainable in social and cultural terms.

Quality of Life

5.6 *Is the development likely to have an impact on the health of local people?*

The development is likely to have a positive impact on the health and wellbeing of local people within Rhyl. The Market Hall and Events Space will be used on a day to day basis as breakout space for the Market Hall as well as an all weather indoor multi-functional events space. This flexible space will be able to host cultural and social events and activities that currently cannot be accommodated within the town centre and under cover providing an all-weather facility. Such events and activities might include, theatre, exhibitions, cabaret (award dinners, weddings, comedy etc), live music, and indoor recreation/sports.

The outdoor public space and the improved public realm will also provide spill out space for the ground floor businesses as well as space for pop up events and social gatherings, and general amenity space for the existing and new residents, employers, employees and visitors.

As a whole, the development will provide a much-needed space for the community to interact and hold events whilst also providing a safe outdoor space, reducing the potential for crime and increasing the wellbeing of those in Rhyl and the wider Denbighshire area.

5.7 *Is the development likely to have an impact on the amenity of the local area?*

The development will improve the amenity of the area by regenerating and enhancing the vitality of the town centre whilst also improving the economic wellbeing of Rhyl generally.

5.8 *Is the development likely to lead to the threat of increased crime or violence in the community?*

The development is likely to lead to a decreased threat of crime or violence in the community. The development itself will bring additional activity and vitality to the area during the day and at night, potentially increasing the security of the development and surrounding areas. Passive surveillance will also be created through the residential units that are proposed as part of the scheme through windows which will overlook the public areas.

Economic Factors

5.9 *Is the development likely to have a detrimental impact on local businesses?*

The development will not have a detrimental impact on local businesses. The development will increase footfall in the town centre which will benefit the existing businesses. In addition to the local spend that this will generate, the enhanced activity and vibrancy could encourage further investment by new occupiers as it will give them confidence that the area is thriving.

5.10 *Is the development likely to have a detrimental impact on local jobs?*

The development will not have a detrimental impact on local jobs and will create employment opportunities through the construction phase of the development as well as through the commercial and leisure spaces proposed.

5.11 *Is the development likely to lead to greater economic diversity?*

The development is unlikely to generate a significant increase in economic diversity as it is seeking to stabilise/reverse a steep decline in the vitality of Rhyl town centre that has occurred in recent years, however, the new Market Hall and Events Space will seek to introduce a new focus on Welsh food and produce as well as the provision of a flexible all weather Event space that will be able to host cultural and social events and activities that currently cannot be accommodated within the town centre.

5.12 *Is the development likely to have an impact on local wage / salary levels?*

The development is not likely to have a negative impact on the local wage levels in Rhyl.

5.13 *Is the development likely to have an impact on the average cost of housing?*

It is considered that there would be no direct consequence expected on the average cost of housing, although there may be a longer term consequential impact of improving the residential market in the town, which is important in restoring confidence in Rhyl town centre.

Infrastructure Supply

5.14 *Is the development likely to have an impact on local schools?*

DCC's Education Service has provided information on the capacity of local Primary and Secondary Schools, which demonstrates that overall there is a surplus of 140 spaces (5.19%) in local Primary Schools (total capacity 2,697 – total pupil Numbers 2,557) and a surplus of 271 (15.94%) in local Secondary Schools (total capacity 1,700 – total pupil numbers 1,429). On the basis of this evidence it is concluded that the development will not have an impact on local schools.

5.15 *Is the development likely to have an impact on health care provision?*

The development is unlikely to have an impact on health care provision.

5.16 *Is the development likely to have an impact on the provision of local services, such as shops / post offices / banks / pubs?*

As set out above, the development is likely to increase investment in local services due to increased confidence from occupiers through the regeneration of the town. As such, over time, the provision of services should increase through ongoing investment into the area.

Social and Cultural Aspects

5.17 *Will the development potentially lead to social tensions, conflict or serious divisions within the Welsh speaking community?*

The development will not lead to social tensions, conflict or divisions within the Welsh speaking community. The new Market Hall and Events Space will seek to introduce a new focus on Welsh food and produce as well as the provision of a flexible all weather Event space that will be able to host cultural and social events and activities that will provide the opportunity for greater celebration of the Welsh language and a focus for bringing the Welsh speaking community together.

5.18 *Will the development potentially lead to changes in local Welsh traditions/culture?*

The development is unlikely to lead to any significant changes in local Welsh traditions or culture, however, as stated previously, the new Market Hall and Events Space will seek to introduce a new focus on Welsh food and produce as well as the provision of a flexible all weather Event space that will be able to host cultural and social events and activities that will provide the opportunity for greater celebration of the Welsh language and a focus for bringing the Welsh speaking community together.

The development is likely to lead to further investment in Rhyl and greater footfall within the town, which will benefit the existing local businesses which play an important part in the local community.

Prior to the application being submitted to the Council, public consultation is to undertaken for a period of 28 days. This will give residents, interested parties and local stakeholders the opportunity to comment on the proposed plans as well as raise any concerns in regard to the Welsh culture and local traditions that will then be considered by the applicant ahead of any formal planning submission.

5.19 *Will the development be likely to have a potential impact on local voluntary / activity / youth groups?*

The development is likely to create opportunities for local voluntary, activity and youth groups through the provision of a multi-purpose Events space that can be used by the community, as well as other facilities such as a new library and commercial office space within the town.

Mitigation Measures

5.20 This Community & Linguistic Statement demonstrates that the proposed development would not result in negative impacts upon the linguistic and social character and the locality, and indeed it offers an opportunity to strengthen the identity of the community and the Welsh language.

5.21 Whilst this is the case, and in order to further safeguard the Welsh Language the applicant will promote the use of the Welsh language as part of the proposed development through activities and events in the new Market Hall and multi-purpose Events space as well as proposing that all signage within the site will be bilingual.

6.0 Conclusion

6.1 This Statement has identified that in preparing the proposed development, due consideration has been given to any effects of the proposal on the Welsh language.

6.2 We consider that the proposal provides an opportunity to promote the use of the Welsh language as well as introduce a range of social and economic benefits to the area, which include:

- Redevelopment of 0.93 hectares of previously developed land within a core town centre location currently occupied by a number of buildings that are mainly vacant and in a very poor state of repair, which in turn will improve the physical appearance and character of town to provide a much more positive image of the town for shoppers and visitors.
- Provision of 14,706 sqm of new commercial, residential, and civic floorspace created (new Market Hall and Events Space, modern library, modern office space, retail/food and beverage (A1, A3/A4), residential apartments).
- 4,770 sqm of new high quality and publicly accessible public realm and landscaping.
- 100 jobs accommodated and a further 35 gross jobs created (an estimate of further jobs created at 50% of what might occur because all building occupiers cannot be identified at the present time) through the provision of the new Market Hall and Events Space.
- The proposed modern library, office, retail and food/beverage floorspace will serve to retain and create important town centre jobs in the long term by providing new and improved accommodation as well as increasing footfall within the heart of the town centre to sustain and support existing and new business.
- 25 enterprises accommodated – within the Market Hall/Events Space at one time
- The proposed new apartments will meet an identified need for 1 and 2 bed residential units within the County.
- The proposed new apartments will introduce a residential product and offer that is currently not found within the town, which will have the benefit of creating a new market that will attract a greater and more diverse population into Rhyl that will assist and sustain the regeneration of the town centre.
- The proposed new apartments and commercial floorspace will increase investment in the town through increased Council Tax and Business Rate revenue.
- Training and employment opportunities – encouraging contractors to recruit and train economically inactive persons as part of the workforce delivering any contract let, directly or indirectly through the supply chain. This could include employment, apprenticeships, work experience, work trials or other relevant training opportunities.
- Supply chain opportunities for SMEs based in Wales, which could include sub-contracting through Sell2Wales and using the Welsh Government's Supplier Development service to promote tender opportunities and hold 'Meet the Buyer' events.
- Contributions to Community and Education with successful contractors working with local schools and colleges to support work experience placement, careers days, support for school projects; and making a contribution to community regeneration by donation, in-kind donation, support for local projects and consultation/education.

- Sensitive restoration, repair and refurbishment of an important heritage building within the boundary of the Rhyl Central Conservation Area to provide more attractive retail and commercial floorspace and increase the buildings productive economic use.
- Preservation and enhancement of the character of the Rhyl Central Conservation Area.
- Enhanced setting of one Grade II Listed Building (Sussex Street Baptist Church).

6.3 Overall, we do not consider there to be any negative impacts resulting from the development.

6.4 We believe that this statement and the accompanying planning documents have demonstrated that the application is compliant with local and national planning policy and that every effort will be made to ensure the promotion of the Welsh language and its retention within Rhyl.