



Community and Linguistic Impact Assessment

Ablett Unit Redevelopment, Glan Clwyd Hospital

DRAFT

**Betsi Cadwaladr University Health Boards and BAM
Construction**

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1.0 Introduction

1.1 Requirement for a Community and Linguistic Impact Assessment

1.1.1 On behalf of the applicant (Betsi Cadwaladr University Health Board), this Community and Linguistic Impact Assessment (CLIA) has been prepared by WYG Planning and Environment in support of an outline planning application (with all matters reserved) for:

"...the erection of a hospital unit (Use Class C2) alongside associated landscaping and site vehicular access and the erection of a multi-storey car park with associated works."

1.1.2 Policy RD5 – The Welsh language and the social and cultural fabric of communities of the Denbighshire County Council Local Development Plan (adopted 4th June 2013) specifies that a Community and Linguistic Impact Assessment will be required for applications over certain development thresholds:

'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 3,000m² or more, large scale infrastructure projects with long term community impacts.'

1.1.3 In accordance with Policy RD5 of the LDP, a CLIA has been prepared and is submitted as part of the planning application. We understand the requirement for a CLIA has also been confirmed by Denbighshire County Council in its pre-application advice.

1.2 Purpose of the Community and Linguistic Impact Assessment

1.2.1 The purpose of this CLIA is to:

- Demonstrate that consideration has been given to the Welsh Language during the process of formulating the development proposal;
- Establish the likely impact of the proposed development on the local community and the Welsh language;
- Illustrate that the development will contribute to create the social climate and conditions that facilitate the use of the Welsh language;



- Determine what measures are required to either mitigate negative impacts or enhance and disseminate the positive impact of the proposal on the Welsh language.



2.0 Legislation & Policy Review

2.1 Introduction

2.1.1 An overview of the key legislation and policy associated with the promotion and protection of the Welsh language (both locally and nationally) is set out within this section of the Assessment.

2.2 Planning (Wales) Act (2015)

2.2.1 Section 31 of the Planning (Wales) Act (2015) amends section 70 of the Town and Country Planning Act 1990 by adding the following clause: *"any considerations relating to the use of the Welsh language, so far as material to the application"*. This means there is a duty, when determining a planning application, to include considerations in relation to the Welsh language, where relevant to that application.

2.3 The Well-Being of Future Generations (Wales) Act 2015

2.3.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *"public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle"*.

2.3.2 Within the Act, sustainable development is defined as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.

2.3.3 The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

2.3.4 The Act sets out seven 'well-being' goals as follows, including the following in regard to Welsh language specifically:

- "A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation".



2.4 Welsh Language Standards

- 2.4.1 The Welsh Language Standards were created as a result of the Welsh Language (Wales) Measure 2011. The measure places a language duty upon organisations in Wales. The aim of the language duties is to ensure that organisations in Wales should not treat Welsh less favourably than English. According to the Welsh language standards, organisations should also promote the Welsh language, ensuring that Welsh has an active role in the organisation's internal administration, and that the language is accessible to the public. Every Public Services organisation in Wales has to comply with language duties.
- 2.4.2 Public services bodies are provided with a compliance notice which lists the language duties they must comply with. The Betsi Cadwaladr University Health Board compliance notice sets out the standards relating to service delivery, policy making, record keeping, operational standards and supplementary matters.

2.5 Cymraeg 2050: A Million Welsh Speakers

- 2.5.1 The following overarching targets are set out within the Welsh Government's strategy document 'Cymraeg 2050: A Million Welsh Speakers' (2017):
- The number of Welsh speakers to reach 1 million by 2050;
 - The percentage of the population that speak Welsh daily and can speak more than just a few words of Welsh, to increase from 10% (in 2013-15) to 20% by 2050.
- 2.5.2 The strategy highlights the importance of securing the future vitality of Welsh-speaking communities as places that facilitate the use of the language in every aspect of life. The Welsh Government's vision is *"to secure favourable circumstances throughout the country that support language acquisition and use of Welsh language skills. We want to see an increase in language transmission in the family, early introduction of Welsh to every child, an education system that provides Welsh language skills for all, and greater appreciation of Welsh language skills in the workplace. At the same time, we are committed to supporting people to use Welsh socially, at work, and when accessing services"*.

2.6 Planning Policy Wales (PPW) Edition 10 (December 2018)



- 2.6.1 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 2.1, is *"to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales"*.
- 2.6.2 One of the key objectives of PPW is to *"enable the Welsh language to thrive"*. Paragraph 3.25 advises that *"The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the Thriving Welsh Language well-being goal"*.
- 2.6.3 Paragraph 3.28 highlights that Welsh Language may be taken into account by decision makers so far as they are material to applications for planning permission. In regard to Welsh language impact assessment, Paragraph 3.29 states that *"If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language"*.
- 2.6.4 Chapter 5 (Productive and Enterprising Places) sets out that *"A Vibrant Culture and thriving Welsh Language are supported by the provision of jobs and economic activity which needs to be strategically planned and managed. The Welsh language and culture makes a distinctive contribution to the viability of communities"*.

2.7 TAN 20 (Planning and the Welsh Language)

- 2.7.1 Technical Advice Note (TAN) 20 provides guidance on how the Welsh language may be given appropriate consideration in the planning system.
- 2.7.2 It is set out at Paragraph 1.7.3 of the TAN that *"the future of the language across Wales will depend on a wide range of factors beyond the town and country planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The planning system can contribute to the future well-being of the Welsh language, by establishing the conditions to allow sustainable communities to thrive. For example, creating conditions for well-paid employment opportunities and a range of quality housing options are integral to planning for sustainable communities"*.



2.7.3 Paragraph 3.1.2 highlights that in determining individual planning applications, considerations relating to the use of the Welsh language may be taken into account so far as they are material – however, *"Section 70(2) TCPA does not give any additional weight to the Welsh language above any other material consideration and decisions on all applications for planning permission must be based on planning grounds only and be reasonable"*.

2.8 Denbighshire Local Development Plan 2006-2021

2.8.1 The Development Plan for Denbighshire comprises of the Local Development Plan (LDP) 2006 – 2021 adopted in June 2013.

2.8.2 Policy RD 5 – The Welsh Language and the social and cultural fabric of communities indicates that *"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 of location would cause significant harm to the character and language balance of a community"* (WYG underlining)

2.8.3 In order to make an informed decision on applications that may have an effect on the future of the Welsh language in Denbighshire, applicants will normally be expected to submit a Community Linguistic Statement to accompany applications for smaller developments. For larger schemes i.e. 20 residential units or more, commercial, industrial or leisure/tourism of 3,000 sqm or more, or large-scale infrastructure projects a more detailed assessment in the form of a Community and Linguistic Impact Assessment (CLIA) is required.

2.8.4 Furthermore, developers will be expected to provide bilingual signage as a minimum means of promoting the Welsh language. In appropriate circumstances, the council may seek mitigation against adverse effects through planning obligations as part of a section 106 agreement.

2.8.5 As the proposed development comprises c.9,200sqm of floorspace a CLIA has been prepared and accompanies the application.

Replacement Local Development Plan 2018-2033 (Emerging)

2.8.6 The adopted LDP expires in December 2021. Denbighshire Council has agreed a timetable for delivering a replacement LDP with Welsh Government. A 'Preferred Strategy' of the LDP is currently in draft format, which was open for public between in July/August 2019.



2.8.7 The replacement LDP is currently still in its early stages of preparation and is considered to be of limited weight in the determination of planning applications at present.

2.9 Supplementary Planning Guidance – Planning and the Welsh Language

2.9.1 The Planning and the Welsh Language SPG (adopted March 2014) offers broad guidance which assists the decision-making process and elaborates on the relevant national and local level planning policies.

2.9.2 With reference to Policy RD5 of the LDP, paragraph 6.1 states: *"...In most cases it is more likely that mitigation methods will be sought in association with new proposals on allocated sites which are in conformity with other policies in the LDP rather than issuing an outright planning refusal for linguistic reasons alone."*

2.9.3 The SPG states that an Impact Assessment will ask more searching questions on potential linguistic impacts and require a developer to propose some mitigation measures if necessary, to reduce any perceived harmful impacts on the Welsh language.

2.9.4 Appendix 4 of the SPG indicates that impact of proposed development will be viewed against five aspects of community life:

1. Population (levels and the characteristics of that population)
2. Quality of life (therefore providing the impetus for people to remain, leave or move to the community)
3. The economy (affecting employment opportunities for different groups as well as the cost of living and, more specifically, the cost of housing)
4. Infrastructure (needed to sustain the community, particularly schools, health care and essential services)
5. The social and cultural life of the community (expressed through the viability of cultural institutions, particularly those affecting younger people).

2.9.5 The SPG also outlines specific examples of mitigation. These include:

- Affordable housing provision;



- Phasing of housing proposals;
- Education provision and places;
- Signage and place names (including marketing name, street names and other signage);
- Employment initiatives and training;
- Contribution to community facilities and groups; and
- Funding for Welsh courses or other related initiatives active in the Community.



3.0 Site Description and Surrounding Area

3.1 Site Description

3.1.1 The application site is located within the settlement boundary of Bodelwyddan, within the Denbighshire County Council administrative boundary. The Glan Clywd Hospital campus in its entirety extends to approximately 18 hectares, located on the northern side of Bodelwyddan. Vehicle access to the hospital campus is available from two access points from Rhuddlan Road, the southern access point being provided from a three-arm roundabout junction. The planning application site is formed of two parcels of land, one representing the proposed site for the new Ablett Unit building and the other the location for the proposed multi-storey car park.

3.2 The Surrounding Area

3.2.1 Glan Clwyd Hospital is located in Bodelwyddan, which is a small town lying between St Asaph to the east and Abergele to the west. Bodelwyddan is principally accessible via the A55 North Wales Expressway which provides links to, St. Asaph, Abergele and beyond.

3.2.2 The Ablett Unit forms part of and lies within the wider Glan Clwyd Hospital grounds. In terms of immediately surrounding area, the hospital lies at the northern limit of Bodelwyddan, beyond which is countryside. To the south and west lie residential estates and the wider settlement.

3.2.3 The hospital site is well connected to the local highway network with junction 25 of the North Wales Expressway located under 1km to south. The site is well served by public transport, with the nearest bus stop found outside the main hospital building entrance approximately 250 metres north.

3.3 Proposed Development

3.3.1 As outlined above in the preceding sections the proposed development is the erection of a hospital unit (Use Class C2) alongside associated landscaping and site vehicular access and the erection of a multi-storey car park with associated works.

3.3.2 Further details of the proposed development can be found in the accompanying application documents and drawings including the Design and Access Statement and Planning Statement



4.0 Community and Linguistic Impact Assessment

4.1 Assessment Methodology

4.1.1 This section of the Statement considers the impact of the proposed development on the Welsh language in accordance with the criteria set out as part of Appendix 4 of the Denbighshire Planning and the Welsh Language SPG and with regard to LDP Policy RD5 and national planning policy included in PPW10 and TAN 20.

4.1.2 The CLIA methodology set out within the Planning and Welsh Language SPG comprises a checklist to allow the developer and LPA to make an assessment of the likely impact of a development proposal against five aspects of community life. These are:

1. Population (levels and characteristics of that population);
2. Quality of life (therefore providing the impetus for people to remain, leave or move to the community);
3. The economy (affecting employment opportunities for different groups as well as the cost of living and, more specifically, the cost of housing);
4. Infrastructure (needed to sustain the community, particularly schools, health care and essential services); and
5. The social and cultural life of the community (expressed through the viability of cultural institutions, particularly those affecting younger people).

4.1.3 The checklist contains 18 questions across the 5 topic areas. Each question will score +1, -1 or 0, with the overall impact depending on the number of positive/negative scores and the degree to which negative impact may be mitigated. Following the main question, the SPG sets out a four-part methodology to add further comment to the key issues. These are:

- a) After each question there is an opportunity to describe the overall assessment;
- b) Provide a statement of evidence, normally based on previous experience;
- c) Provide a statement of whether you consider that the development will have a positive (+1), neutral (0) or negative (-1) community impact; and



d) How might any negative impacts be mitigated and/or positive impact enhanced.

- 4.1.4 In order to assess the impact of development across the 5 topic areas, a population profile for the subject area is produced. This profile will assist in answering the 18 impact assessment questions and will draw on data published as part of the 2011 census and statistics produced by Denbighshire County Council as part of the Planning and Welsh language SPG. Alongside the local community profile, an assessment question table has been produced, which enables a clear visual indication of assessment scores across the 18 questions and 5 topic areas.
- 4.1.5 A baseline review of the local community and the Welsh language context has been undertaken to inform the detailed questions as part of the Impact Assessment. This includes sections relating to Community Engagement, Population Profile, Development Characteristics and Positive Mitigation Measures.

4.2 Local Community Profile

- 4.2.1 To underpin the CLIA, an understanding should be established of the local community and language profile in the context of the site. Planning and Welsh Language SPG offers the following guidance regarding population profiles:

'Some understanding of the local demographic make-up of the settlement or Community Council area where the application is located will be essential in order to understand how the community might be affected, including changes over time. The overall population and age profile will assist in building up a picture of why the development is required and who is likely to benefit. The number of current and past Welsh speakers will be critical. The LPA will provide reference to background statistical information on a City, Town and Community Council basis.'

- 4.2.2 This section of the statement provides a detailed assessment of information about the local community. This includes a review of: the local population (assessment of the population and Welsh language profile) and; the local infrastructure (assessment of the facilities and services profile).



Population Profile

4.2.3 At a local/community level, the application site is within the Bodelyyddan ward of Denbighshire. The total population of the Bodelyyddan ward in 2011 was 2,147¹.

4.2.4 The age profile of the local community as of 2011 is illustrated in **Table 1** below. As shown, the average age of the local community is 38.8 years.

Table 1 Age Profile

Age Structure						
	Bodelyyddan Ward (as of 2011)		Denbighshire (as of 2011)		Wales (as of 2011)	
	Count	%	Count	%	Count	%
All usual residents	2147	100	93734	100	3063456	100
Age 0 to 4	148	6.9	5323	5.7	178301	5.8
Age 5 to 7	88	4.1	2986	3.2	99429	3.2
Age 8 to 9	50	2.3	1975	2.1	63650	2.1
Age 10 to 14	125	5.8	5473	5.9	177748	5.8
Age 15	23	1.1	1196	1.3	37168	1.2
Age 16 to 17	57	2.7	2543	2.7	77111	2.5
Age 18 to 19	48	2.2	2270	2.4	84841	2.8
Age 20 to 24	141	6.6	5212	5.6	211924	6.9
Age 25 to 29	118	5.5	4525	4.8	185728	6.1
Age 30 to 44	478	22.3	16269	17.4	570894	18.6
Age 45 to 59	385	17.9	19113	20.4	609233	19.9
Age 60 to 64	154	7.2	7159	7.6	204885	6.7
Age 65 to 74	195	9.1	10585	11.3	300550	9.8
Age 75 to 84	101	4.7	6522	7	187434	6.1
Age 85 to 89	25	1.2	1656	1.8	49360	1.6
Age 90 and over	11	0.5	927	1	25200	0.8
Mean Age	38.8	-	42.39	-	40.62	-
Median Age	39	-	44	-	41	-

Source: ONS 2011 Census Data, Age Structure KS102EW

4.2.5 As can be seen above, the population profile illustrates a slightly younger population in Bodelyyddan when compared to the wider Denbighshire area and Wales as a whole. This is

¹ UK Census 2011



reflected in comparatively lower mean and median age observed in Bodelwyddan. The age categories 0-4 and 5-7 make up a higher percentage of the local population when compared to the Denbighshire and Wales average. This potentially points to a higher number of families in the community, which is also reflected in the higher percentage of residents in the 30-44 age bracket. A comparatively lower number of residents are observed in the 45-59 age category, 2.5% below the Denbighshire average. A comparatively lower number of residents are observed in the age 65-74 and age 75-84 brackets.

North Wales Population Overview (2017)

- 4.2.6 The North Wales Population Assessment 2017 indicates that Denbighshire's population is projected to increase by 2.7% (around 2,500 people) between 2014 and 2039. The population aged 75 years and over is projected to increase by 7,500, while the population aged 18 to 74 years is projected to decrease by 4,800. Net migration will account for an increase of 6,600 in the population, driven by migration. Natural change will be down by 4,100.

Denbighshire Local Housing Market Assessment (2019)

- 4.2.7 The Denbighshire Local Housing Market Assessment states that Denbighshire has a significant proportion of older people, with a higher proportion of people in the 65 and over bracket than in England and in Wales comparatively. The shortfall in this percentage is made up in the 16-64 age bracket; this is the bracket that is most commonly associated with economic activity. As a percentage of the population, both England and Wales therefore have higher number of individuals in the economically active bracket than Denbighshire and less in the retired bracket.
- 4.2.8 Additionally, the assessment indicates that population projections illustrate that over the life of the LHMA (2019-2024), the amount of people in the 65 and over age bracket is expected to increase greatly, whilst a small decrease is expected in the 16-64 age range.

Internal Migration

- 4.2.9 The Office for National Statistics dataset: Internal migration: by local authority and region, five year age group and sex, sets out the inflow, outflow and net internal migration figures for Denbighshire using the most recent published data for the year ending June 2018.

**Table 2 Denbighshire Internal Migration**

Denbighshire Internal Migration (year ending June 2018)			
Age	Inflow	Outflow	Net
0-4	222	228	-6
5-9	190	144	46
10-14	176	135	41
15-19	182	502	-320
20-24	635	624	11
25-29	439	442	-3
30-34	359	347	12
35-39	265	230	35
40-44	223	189	34
45-49	227	184	43
50-54	277	179	98
55-59	266	208	58
60-64	269	140	129
65-69	210	152	58
70-74	156	147	9
75-79	74	78	-4
80-84	63	61	2
85-89	73	32	41
90+	52	30	22

Source: ONS, Internal Migration by Local Authority (year ending June 2018)

4.2.10 The above dataset outlines the inflow, outflow and net internal migration figures for Denbighshire using the most recent published ONS data for the year ending June 2018. As can be seen above,



the 15-19 age group category demonstrates a notable loss of 320 people. Notable net gains are seen in age categories 60-64 (129 people) and 50-54 (98 people).

Welsh Language Profile

4.2.11 The Planning and the Welsh language SPG uses data from the 2011, 2001 and 1991 UK Census to compile Welsh Language Speaker information by Community Council Area. Statistics for the Bodelwyddan Community Council Area and Denbighshire as a whole are displayed in **Table 3** below:

Table 3 Welsh Speaking, Bodelwyddan and Denbighshire

Community Council	Population 2011	Population 2001	% Born in Wales	% Welsh Speakers 2011	% Welsh Speakers 2001	% Welsh Speakers 1991
Bodelwyddan	2,147	2,103	57.4	17.9	18	17
Denbighshire	93,734	93,102	58.1	24.6	-	-

Source: Planning and the Welsh Language SPG, Denbighshire County Council, using ONS 2011, 2001 and 1991 Census data

4.2.12 As set out above, the percentage of population born in Wales in the Bodelwyddan Community Council Area is marginally below the Denbighshire average, at 57.4%, 0.7% below the County Council average of 58.1%. Additionally, the percentage of Welsh speakers in Bodelwyddan in 2011 is 17.9%, 6.7% below the Denbighshire average of 24.6%. Although no comparison can be made between Bodelwyddan and Denbighshire over the 1991 and 2001 census data, the percentage of Welsh speakers in Bodelwyddan has risen by 0.9% from 1991 to 2011.

4.2.13 The composition of Welsh Language skills within the local community and Denbighshire as a whole is illustrated in **Table 4**, which shows the percentage of the total population within the Bodelwyddan ward and Denbighshire as a whole aged 3 and over with one or more skills in Welsh. As shown in the table, the percentage of the local community who have *some* degree of skill in the Welsh language (whether this to be understanding, speaking, writing or a combination of skills) totals 28.6%.

**Table 4 Welsh Language Skills**

	Bodelwyddan		Denbighshire		Wales	
	Count	%	Count	%	Count	%
All usual residents aged 3 or over	2,064	-	90,527	-	2955841	100
No skills in Welsh	1,473	71.4	58,440	64.6	2167987	73.3
Can understand spoken Welsh only	168	8.1	7662	8.5	157792	5.3
Can speak Welsh	369	17.9	22,236	24.6	562016	19
Can speak but cannot read or write Welsh	75	3.6	3251	3.6	80429	2.7
Can speak and read but cannot write Welsh	45	2.2	1964	2.2	45524	1.5
Can speak, read and write Welsh	240	11.6	16,842	18.6	430717	14.6
Other combination of skills in Welsh	102	3.1	2368	2.6	73392	2.5

Source: ONS 2011 Census Data, Welsh Language Skills KS207WA

4.2.14 As can be observed above, Welsh language skills in Bodelwyddan are broadly lower in comparison to Denbighshire as a whole. The proportion of the population with no skills in Welsh is comparatively higher than the Denbighshire average, by 6.8%. Additionally, the percentage of population that can speak Welsh in Bodelwyddan is 6.7% below the Denbighshire average of 24.6%. From a national perspective, Bodelwyddan has a lower percentage of the population with no skills in Welsh and a higher percentage of the population who can understand spoken Welsh only. The percentage of the population that can speak Welsh in Bodelwyddan 1.1% below the level observed in Wales as a whole.

4.2.15 The distribution of Welsh language skills by age group within Bodelwyddan is illustrated in **Table 5** below:



Table 5 Welsh Language Skills by Age Group

Age	All categories	Can understand spoken	Can speak Welsh	Can read Welsh	Can write Welsh	No Skills in Welsh
All categories: Age 3 and	2,064	517	369	333	265	1473
Age 3 to 15	351	112	104	76	73	211
Age 16 to 24	246	68	49	49	36	166
Age 25 to 34	262	62	39	38	25	196
Age 35 to 49	483	112	80	76	61	354
Age 50 to 64	390	83	43	49	30	300
Age 65 and	332	80	54	45	40	246

Source: ONS 2011 Census Data, Welsh Language Skills by Age and Ward Data Set: LC2106WA

Economic Profile

4.2.16 The economic profile of the local community is illustrated in **Table 6** below. A total of 62% of the population are economically active. Unemployment stands at 4%.

Table 6 Economic Activity

	Bodelwyddan Ward		Denbighshire		Wales	
	Count	%	Count	%	Count	%
All usual residents aged 16 to 74	1576	100	67676	100	2245166	100
Economically active	1099	69.7	44409	65.6	1476735	65.8
Employee – Part time	222	14.1	9696	14.3	313022	13.9
Employee – Full time	653	41.4	23121	34.2	799348	35.6
Self employed	138	8.8	6971	10.3	194029	8.6



Unemployed	50	3.2	2857	4.2	96689	4.3
Economically inactive	477	30.3	23267	34.4	768431	34.2
Retired	230	14.6	12487	18.5	361501	16.1
Inactive students	93	5.9	3239	4.8	133880	6
Looking after home or family	53	3.4	2314	3.4	86396	3.8
Long term sick or disabled	75	4.8	4088	6	140760	6.3
Other	26	1.6	1139	1.7	45894	2
Unemployed: Age 16 to 24	15	1.0	960	1.4	30772	1.4
Unemployed: Age 50 to 74	12	0.8	537	0.8	16820	0.7
Unemployed: Never worked	8	0.5	417	0.6	14951	0.7
Long term unemployed	18	1.1	1111	1.6	38428	1.7

Source: ONS 2011 Census Data, Economic Activity QS601EW and KS601EW

4.2.17 An overview of the nature of employment/industry type within which the local population are employed is illustrated in **Table 7** below.

Table 7 Industry

	Bodelwyddan Ward		Denbighshire		Wales	
	Count	%	Count	%	Count	%
All usual residents aged 16 to 74 in employment the week before the census	1043	100	41156	100	136315	100
A: Agricultural, forestry and fishing	21	2.0	962	2.3	23497	1.7
B: Mining and quarrying	2	0.2	69	0.2	3176	0.2
C: Manufacturing	66	6.3	3737	9	143751	10.5
D: Electricity, gas, steam and air conditioning supply	5	0.5	239	0.6	10903	0.8



E: Water supply, sewerage, waste management and remediation activities	6	0.6	288	0.7	12402	0.9
F: Construction	71	6.8	3482	8.5	111293	8.2
G: Wholesale and retail trade; repair of motor vehicles and motorcycles	159	15.2	5936	14.4	212554	15.6
H: Transport and storage	32	3.1	1592	3.9	53222	3.9
I: Accommodation and food services	72	6.9	2849	6.9	84907	6.2
J: Information and communication	15	1.4	714	1.7	31004	2.3
K: Financial and insurance activities	23	2.2	751	1.8	41630	3.1
L: Real estate activities	10	1	580	1.4	17040	1.2
M: Professional, scientific and technical activities	46	4.4	1694	4.1	58616	4.3
N: Administrative and support services activities	44	4.2	1520	3.7	54366	4
O: Public administration and defence; compulsory social security	75	7.2	2733	6.6	108164	7.9
P: Education	77	7.4	4104	10	137864	10.1
Q: Human health and social work activities	275	26.4	7850	19.1	197226	14.5
R,S,T, U: Other	44	4.2	2056	5	62000	4.5

Source: ONS 2011 Census Data, Industry KS605EW

4.2.18 As shown the local population are employed in a variety of industries, with large percentages of the population working in human health and social work activities, wholesale and retail trade, repair of motor vehicle and motor cycles, manufacturing, construction, accommodation and food services, public administration and defence; compulsory social security and education. Approximately a quarter of the Bodelwyddan population are employed in the human and social work activities sector which likely can attributed to the presence of Glan Clwyd Hospital in the town.



4.3 Local Infrastructure Profile

4.3.1 The application site is located within a highly accessible location, forming part of the Glan Clwyd Hospital site, in the north east of the town. A range of employment opportunities are found in the town alongside a comprehensive offering of services and facilities including; a number of local shops, cafes and restaurants, primary school, places of worship, pharmacy and community facilities. As outlined previously in the assessment, the application site is also situated in close proximity to the dedicated hospital bus stop.

4.3.2 The tables below set out the locally accessible services and facilities found in the vicinity of the application site along with an approximate distance, and the locally available public transport services.

Table 8 Public Transport

Service/Facility	Location	Service
Ysbyty Glan Clwyd bus stop	Hospital main entrance (280 metres north)	51 Max: Denbigh – Rhyl 13: Prestatyn – Llandudno 45: Rhyl - Bodelwyddan
Vicarage Close bus stop	Vicarage Close (200 metres south east)	As above

**Table 9 Local services & facilities serving the application site**

Service/Facility	Location
Marble Church	The Village (350m south east)
Spar – Convenience store	Off Rhuddlan Road (340m south)
Costa Coffee	Off Rhuddlan Road (340m south)
Bodelwyddan Community Centre	Off Ronaldsway (450m west)
Children’s outdoor play area	Off Ronaldsway (450m west)
Co-op Food – convenience store	Swan y Dail (560m west)
Ty Fry Inn – public house	Ty Fry Lane (560m west)
Premier Store – convenience store	John’s Drive (640m west)
Penny’s café	John’s Drive (640m west)
Lucky Garden – takeaway	John’s Drive (620m west)
Bodelwyddan Park	Off Engine Hill (650m south)
Bodelwyddan Pharmacy	Abergele Road (580m west)
Ysgol y Faenol – primary school	Abergele Road (750m west)
Bodelwyddan Business Park	Abergele Road (1km west)
Starbucks – coffee shop	Kinmel Park (1.4km west)



5.0 Impact on Welsh Language – Key Issues

5.1 Compliance of Proposed Development with LDP

- 5.1.1 The proposals map of the LDP identifies the application site as being within the Bodelwyddan settlement boundary. Indeed, Bodelwyddan is a settlement which benefits from a strategic allocation under Policy BSC5 Bodelwyddan Key Strategic Site; this is located approximately 200 metres west of the application site. The strategic site will deliver a mixed-use development comprising residential, employment and community uses. As such, the redevelopment of the site is viewed as highly appropriate and complimentary given its sustainable location at an existing hospital site within the settlement boundary, adjoining a strategic allocation to be brought forward under Policy BSC 1. The principle of the development is considered acceptable.
- 5.1.2 Appendix 4 of the Planning and the Welsh Language SPG sets out the methodology and assessment required as part of a CLIA. Paragraph 2 indicates that a scoring system is employed for each question across the five community life topics. Relative to the degree of community impact, a score of Positive (+1), Neutral (0) or Negative (-1) is recorded. The SPG indicates that *'the ability to compare options is important in undertaking an assessment, guiding the assessor to the 'best' overall choice. The impact assessment helps to inform decisions about which topics perform better than others against the five community life issues by revealing the potential impacts.'* Accordingly, this assessment addresses each assessment question, both within the commentary below and Assessment Questionnaire Table attached at **Appendix 1**.

5.2 Consideration of Effects

Job Creation and the Local Economy

- 5.2.1 As outlined in the preceding sections the importance of job creation in supporting the Welsh language to flourish is emphasised within planning policy at both a national and local level. TAN 20 states *"The planning system can contribute to the future well-being of the Welsh language, by establishing the conditions to allow sustainable communities to thrive...for example, creating conditions for well-paid employment opportunities"*. Whilst at the local level, the Denbighshire Planning and the Welsh language SPG indicates *"It is estimated that between 1,200 and 2,200 fluent Welsh speakers are moving out of Wales each year. One of the aims of the Welsh Government is to reverse this trend and the creation of jobs to sustain communities and the local economy is a key priority to achieving this aim."* Additionally, the SPG states *"Population stability or*



moderate growth, combined with a high quality of life, a strong economy, high quality infrastructure and a vibrant social and cultural life are all central to community cohesion and sustainability. Where the Welsh language forms a part of the social fabric of a community, its fate and well-being is inexorably tied to the wider fortunes of that community. If a development is likely to be detrimental to any one of these aspects, it may also have an adverse impact on the Welsh language. However, if it is sensitive to the local context e.g. supporting the local economy, then the impact is far more likely to be positive.”

- 5.2.2 The redevelopment of the Ablett Unit will deliver improved healthcare facilities that are specifically designed to support patient recovery. The redevelopment will also introduce new models of care which better meet the needs of patients in the local and regional community. By creating modern environments and facilities which enable staff to deliver high levels of care it is anticipated that improved levels of staffing could be achieved. Improved facilities are likely to improve staff retention, meaning that members of the local community who work in healthcare, (which plays an important role in the Bodelwyddan industry groupings), are more likely to stay and work in the area, as opposed to leaving the area to pursue other opportunities. This should benefit the Welsh Government’s prevailing aim to reverse the trend of fluent Welsh speakers leaving Wales.
- 5.2.3 In summary, the proposed redevelopment of the Ablett Unit will deliver increased job numbers for both the local and regional population. The proposed development will also enable Glan Clwyd Hospital to be viewed as a more attractive workplace for existing and prospective employees due to the improved facilities and services. Therefore, the proposed development will positively contribute towards staff retention, staff recruitment and the local economy.
- 5.2.4 It is expected that the employment opportunities during the construction process of the proposed development can be met locally, given the prevalence of construction workers as an industry grouping within Bodelwyddan and Denbighshire as a whole (see Assessment Table Question 9). As such, it is anticipated that a proportion of those construction workers who will be employed during the construction process will be Welsh speakers.
- 5.2.5 In addition, the proposed development will indirectly support additional employment within the associated supply chain activities at the operational stage of the development. Employment opportunities generated by the new facilities to be created will have the potential to support the long-term vibrancy of the Welsh language within Bodelwyddan and Denbighshire as a whole, through the creation of a variety of permanent job opportunities. The workplace is linguistically important in that it represents one of the key spheres within the local community where Welsh is



spoken. The creation of new jobs at the application site will have a positive impact on the local community, providing employment for local people who may otherwise need to leave Bodelwyddan or Denbighshire to find work elsewhere (see Assessment Table Questions 1, 3 and 9).

- 5.2.6 As noted in the Population Profile in the preceding section, 26.4% of the population of the Bodelwyddan ward are employed within the human health and social work activities industry grouping. Although the proposed development will not diversify the local economy, it will crucially bolster Bodelwyddan's primary economic activity. The proposed development will complement the role of Glan Clwyd Hospital as a regionally important asset by providing improved health care facilities which serve Denbighshire and Conwy. The improvement of local facilities will encourage community cohesion by providing a greater potential for locals to engage with one another, with many interactions anticipated to be in Welsh.
- 5.2.7 In the context of the aforementioned prevailing planning policy the proposals will contribute to a strong economy, therefore preserving community cohesion and sustainability, with the Welsh language as part of it.

Language and Population Movement

- 5.2.8 As set out in the population profile, the percentage of population born in Wales in the Bodelwyddan Community Council Area is slightly below the Denbighshire average, at 57.4%, 0.7% below the County average of 58.1%. However, the percentage of Welsh speakers in Bodelwyddan from 2011 is 17.9%, 6.7% below the Denbighshire average of 24.6%. Although no comparison can be made between Bodelwyddan and Denbighshire over the 1991 and 2001 census data, the percentage of Welsh speakers in Bodelwyddan increased by 1% between 1991 and 2001 before dropping 0.1% from 2001 to 2011.
- 5.2.9 Welsh language skills in Bodelwyddan are broadly lower in comparison to Denbighshire as a whole. The proportion of the population with no skills in Welsh is comparatively higher than the Denbighshire average, by some 6.8%. Additionally, the percentage of population that can speak Welsh in Bodelwyddan is 6.7% below the Denbighshire average of 24.6%.
- 5.2.10 The proposed redevelopment of the Ablett Unit will serve a local need and a wider regional need in Denbighshire and Conwy. Although some of the specialist roles required as part of the Ablett Unit may require recruitment from the wider regional or national labour pool, many of the jobs created at the site will be appropriate to the skills of the local community and surrounding area (as



demonstrated by industry groupings within Bodelwyddan). As such, it is anticipated that in-migration from outside Denbighshire to fill the employment vacancies will not significantly impact the proportion of non-Welsh speaking households.

- 5.2.11 By the nature of the scale and type of jobs to be created, the development will lead to endogenous growth i.e. it will create local jobs and allow people who would otherwise have left the community to remain (see Assessment Table Question 2). As no substantial in-migration is anticipated to result from the proposed development, there is no anticipated significant adverse impact upon the place of the Welsh language as part of the social fabric of the local community.
- 5.2.12 In addition, the proposed development will not result in out-migration and potentially a loss of Welsh speaking households, as the development will not stimulate any direct out-migration; rather the provision of a greater number of jobs and improved facilities for the local community will encourage local people to remain in the area (see Assessment Table Question 3). The job opportunities to be created as part of the proposed development will be appropriate to all ages – the jobs are not tailored to the needs of one particular age group and as such will ensure benefits across the local population. The development will therefore promote and help sustain social balance (see Assessment Table Question 1 and 4).
- 5.2.13 The provision of improved healthcare facilities at Glan Clwyd Hospital will increase mental health service capacity to meet current and anticipated future demand. This will enable more people from Denbighshire and Conwy to receive care closer to home. By providing new and improved facilities and services this can potentially benefit members of the local and regional population who may have previously had to move out of the area to be closer to appropriate healthcare facilities. This point is particularly relevant in Denbighshire. The North Wales Population Overview (2017) indicates that the population in Denbighshire aged 75 years and over is projected to increase by 7,500 between 2014-2039. As such, the proposed development may enable older residents to remain in Bodelwyddan and Denbighshire due to improved health care provision, reducing the volume of out migration which would include Welsh speakers.
- 5.2.14 In summary, although Welsh language skills in Bodelwyddan are lower in comparison to Denbighshire as a whole, the proposals are not anticipated to lead to significantly increased levels of in-migration from outside of Denbighshire due to a well-established suitably skilled local workforce, including healthcare workers, from which to draw from. The proposed development will also lead to endogenous growth, creating local jobs for Welsh speaking families who may have previously left Bodelwyddan. The job opportunities anticipated to be created as part of the



development will be appropriate across age ranges, helping to sustain social balance. The points highlighted above directly respond to Assessment Questions 1, 2, 3 and 4.

Infrastructure Supply

- 5.2.15 The proposed development will help address long standing structural issues and will enable staff to deliver higher levels of care. This will lead to improved outcomes for patients, improved staff recruiting and retention of valuable staff members. Additionally, the proposals will allow people from Denbighshire and Conwy to receive care closer to home. The development site is situated in a highly accessible location in close proximity to an established and well served public transport route and is already served by adjoining hospital car parks. The development will deliver improved physical parking infrastructure at the hospital site (see Assessment Question Table 15).
- 5.2.16 It is considered that the proposed redevelopment of the Ablett Unit can also benefit business in the local community. The proposed inward investment and job creation will provide a stimulus to the local economy, supporting local business and community facilities (see Assessment Question Table 8 and 15).
- 5.2.17 Population projections² indicate that Denbighshire's population is projected to increase by 2.7% (around 2,500 people) between 2014 and 2039. Enhanced local services and facilities in accessible locations, within walking distance of frequently served public transport routes, will be of increasing importance to an older generation dependent on public transport.

Quality of Life

- 5.2.18 A slow decline of in quality of important local facilities such as hospitals can contribute to out-migration of households. This is likely to impact on the balance of Welsh / English speaking residents, as well as the balance of different income and social groups.
- 5.2.19 The proposed development will replace the existing Ablett Unit, delivering a purpose built modern mental health unit. The enhancement of local facilities helps to maintain a socially stable and cohesive community.
- 5.2.20 Health deprivation can be seen as one of the factors which contributes towards a reduction in quality of life. Reduction in quality of life can impact community stability. This may be more visible

² North Wales Population Assessment 2017



in settlements that are predominantly Welsh or where Welsh is shown to be part of the social fabric. This can result in people who can afford to move away leaving the area, leading to places becoming socially polarised. The proposed development will directly improve health care provision in the local and regional community, improving the population's quality of life. A strong and stable community is of direct benefit to the local Welsh language.

5.2.21 In terms of amenity, the development will represent an improvement on the existing site, improving natural surveillance through a sensitively designed layout which contributes towards increased security levels. This will actively reduce the opportunities to commit crime or anti-social behaviour. The points raised above directly respond to Assessment Table Questions 6 and 7.

5.2.22 In summary it is considered that the proposed development will positively contribute towards a high quality of life which in turn allows for

5.3 Mitigation and Enhancement Measures

5.3.1 As demonstrated within this statement, the proposed development is anticipated to have an overall beneficial effect on Welsh language. Although the Welsh Language Standards primarily concern services provided by a public body or organisation and therefore relate to the operational use of the proposed development, the scheme will nonetheless comply with the Welsh language Standards to provide appropriate signage in compliance with points 47 – 49 & 111 – 113 (Service Delivery Standards & Operational Standards) of the Betsi Cadwaladr University Health Board Compliance Notice (under section 44 Welsh Language (Wales) Measure 2011).

5.3.2 In order to reinforce the benefits of the development, the following enhancement measures are proposed:

- The applicant will seek to advertise jobs locally and employ staff from the surrounding area across all grades including apprenticeships, graduate jobs and management;
- Welsh language speakers to be interviewed/employed where practicable. Welsh speaking employees to be encouraged to converse in Welsh;
- Welsh signage to be included in keeping with wider hospital signage (in compliance with the Welsh Language Standards).



6.0 Conclusions

- 6.1.1 The LDP (Policy RD 5) requires the needs and interests of the Welsh Language to be taken into account in planning decisions. Development could be refused if its size, scale of location would cause significant harm to the character and language balance of a community.
- 6.1.2 Notwithstanding this, Section 70(2) of the Town and Country Planning (Wales) Act does not give any additional weight to the Welsh language above any other material consideration and decisions on all applications for planning permission must be based on planning grounds only and be reasonable.
- 6.1.3 In conclusion, this Community and Linguistic Impact Assessment demonstrates that the proposed development will not cause significant harm to the character and language balance of the community. On the contrary, it is anticipated to have an overall beneficial impact upon the Welsh language and community in Bodelwyddan and Denbighshire as a whole. With regard to job creation and the economy, the proposed redevelopment of the Ablett Unit will see the creation of modern care environments which enable staff to deliver high levels of care. This should result in better outcomes for patients, improved staff recruitment and the retention of existing staff. In addition to employment opportunities related to the operational phase of the development, the construction phase will see the creation of further employment opportunities which can be fulfilled by the local workforce. As such, the proposals will contribute towards a strong economy, therefore preserving community cohesion and sustainability, with the Welsh language as part of it.
- 6.1.4 It is considered that the proposals will not lead to significantly increased levels of in-migration from outside of Denbighshire due to a suitably skilled, well established local healthcare workforce. The proposed development will also lead to endogenous growth, creating local jobs for Welsh speaking families who may have previously left Bodelwyddan. Providing new and improved healthcare facilities and services can potentially benefit members of the local and regional population who may have previously had to move away from the area to be closer to appropriate healthcare facilities.
- 6.1.5 In terms of infrastructure provision, the proposed development will positively benefit the local community and wider regional community by improving healthcare provision at the established Glan Clwyd Hospital site. It is anticipated that the injection of investment and creation of jobs associated with the proposed development will assist in retaining and securing local people who in turn support and utilise the local services and facilities in the community.



- 6.1.6 It is expected that the proposed development will positively contribute towards a high quality of life which in turn allows for a strong and stable community, to the benefit of the Welsh language. The proposed development will directly improve health care provision within the community and wider region. A new look design will increase environmental attractiveness and create a safer community, reducing the opportunities to commit crime through an effective design.

- 6.1.7 Having regard to the above considerations, it is considered that the proposed development will have a positive impact upon the local community and the Welsh language, and therefore represents an appropriate and policy compliant scheme, in accordance with Policy RD5 of the LDP.



Appendix 1 – Assessment Questionnaire Table



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Assessment Questions	Positive	Neutral	Negative	Score	Notes
1) 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?				0	By the nature of the scale and type of jobs to be created, the development will lead to endogenous growth i.e. it will create local jobs and allow people who would otherwise have left the community to remain, rather than increase the likelihood of in-migration. As no substantial in-migration is anticipated from the proposed development, there will be no significant adverse impact upon the place of the Welsh language in the social fabric of the local community. Accordingly, a neutral (0) score has been awarded.
2) Is the development likely to lead to increased in-migration?				0	Although some of the specialist roles required as part of the Ablett Unit may require recruitment from the wider regional or national labour pool, many of the jobs created at the site will be appropriate to the skills of the local community and surrounding area (as demonstrated by industry groupings within Bodelwyddan). As such, it is anticipated that in-migration from outside Denbighshire to fill the employment vacancies will not significantly impact the proportion of non-Welsh speaking households. Hence, a neutral (0) score has been awarded.
3) Is the development likely to lead to increased out-migration				1	The proposed development will not result in out-migration and potentially a loss of Welsh speaking households, as the development will not stimulate any direct out-migration; rather the provision of a greater number of jobs for the local community will encourage local people to remain in the area. Improved healthcare facilities will benefit the local population, potentially reducing future out-migration. The proposed development will therefore combat potential out migration and has been awarded a positive (+1) score.
4) Is the development likely to lead to a changing age				1	The job opportunities to be created as part of the proposed development are anticipated to be appropriate to a spectrum of ages and reflective of each role – the jobs are not



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structure of the community?					tailored to the needs of one particular age group and as such will ensure benefits across the local population. The development will therefore promote and help sustain social balance and has been awarded a positive (+1) score.
5) Is the development likely to have an impact on the health of local people?				1	The proposed development will directly improve health care provision in the local and regional community, improving the population's quality of life. An improved quality of life could potentially lead to less of the Welsh speaking population leaving the area, to the benefit of the Welsh language. On this basis a positive (+1) score is awarded.
6) Is the development likely to have an impact on the amenity of the local area?				1	The proposed development will replace the existing Ablett Unit with a new modern mental health care facility. This will increase environmental quality. A positive (+1) score has been awarded.
7) Is the development likely to lead to the threat of increased crime or violence in the community?				1	The development will represent an improvement on the existing site, improving natural surveillance through a sensitively designed layout which contributes towards increased security levels. This will actively reduce the opportunities to commit crime or anti-social behaviour. Therefore, a positive (+1) score has been awarded.
8) Is the development likely to have a detrimental impact on local businesses?				1	It is anticipated that the injection of investment and creation jobs associated with the proposed development will assist in retaining and securing local people who in turn support and utilise local businesses. On this basis, a positive (+1) score has been awarded.
9) Is the development likely to have a detrimental impact on local jobs?				1	As stated above, the impetus of inward investment and job creation will provide a stimulus to the Bodelwyddan economy. As such, the proposed development will provide a significant number of new jobs and employment opportunities, positively benefiting the local community and has been awarded a positive (+1) score.
10) Is the development likely to lead to greater economic				0	As noted in the Population Profile, 26.4% of the population of the Bodelwyddan ward are employed within the human health and social work activities industry grouping. Although



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diversity?					the proposed development will not diversify the local economy, it will crucially bolster Bodelwyddan's primary economic activity.
11) Is the development likely to have an impact on local wage/salary levels?				0	The proposed development will provide a significant number of employment opportunities that are well matched to the industry profile of Bodelwyddan, as demonstrated in Table 7 Industry. It is considered that the proposed development will not have an impact upon local wage/salary levels and is accordingly awarded a neutral (0) score.
12) Is the development likely to have an impact on the average cost of housing?				0	It is not anticipated that the proposed development will discernibly influence the average cost of housing and has been awarded a neutral (0) score.
13) Is the development likely to have an impact on local schools?				0	The proposed development is not anticipated to result in increased levels of in-migration. The proposed development is not anticipated to directly impact local schools. A neutral (0) score is awarded.
14) Is the development likely to have an impact on health care provision?				1	The proposed development will positively benefit the local community and wider region by improving healthcare provision at the established Glan Clwyd Hospital site. The proposed redevelopment of the Ablett Unit will deliver enhanced mental care services better meeting current and future demand. The proposed new facilities are specifically designed to support recovery and will introduce new models of care which better meet the needs of patients in the community. These facilities will address long standing structural issues and will enable staff to deliver high levels of care. This will lead to improved outcomes for patients, improved staff recruiting and further retention of valuable staff members. Additionally, the proposals will allow people from Denbighshire and Conwy to receive care closer to home. On this basis a positive (+1) score has been awarded.



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<p>15) Is the development likely to have an impact on the provision of local services, such as shops/post offices/banks/pubs?</p>				<p>1</p>	<p>Population projections (North Wales Population Assessment 2017) indicate that Denbighshire’s population is projected to increase by 2.7% (around 2,500 people) between 2014 and 2039. Improved and expanded healthcare facilities at Glan Clwyd Hospital is necessary. It is anticipated that the injection of investment and creation of jobs associated with the proposed development will assist in retaining and securing local people who in turn support and utilise the local services and facilities in the community. The develop could in turn increase local investor confidence and stimulate additional local investment. Accordingly, the proposed development will benefit the provision of local services and has been awarded a positive (+1) score.</p>
<p>16) Will the development potentially lead to social tensions, conflict or serious divisions within the Welsh speaking community?</p>				<p>0</p>	<p>The nature and scale of the proposed development will not potentially lead to social tensions, conflict or serious divisions within the Welsh speaking community and has been awarded a neutral (0) score.</p>
<p>17) Will the development potentially lead to changes in local Welsh traditions/culture?</p>				<p>0</p>	<p>Although the nature of the proposed development does not directly relate to changes in local Welsh traditions/culture, the health board seek to encourage staff to converse in Welsh when appropriate. Additionally, it has been demonstrated when addressing Question 3 that the proposals could potentially combat out migration via the creation of new employment opportunities, retaining Welsh speakers in the area. When addressing Question 2 it has been demonstrated the proposals will serve a local need and not lead to significant increased in-migration, maintaining community stability and cohesion. A neutral (0) score has been awarded.</p>
<p>18) Will the development be likely to have a potential impact on local voluntary/activity/youth groups?</p>				<p>0</p>	<p>The applicant will seek to support local voluntary/charitable causes wherever practicable. A neutral (0) score has been awarded.</p>



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	Total +9	
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