

24th January 2019

Strategic Planning and Communities
Conwy County Borough Council
Llandudno Library
Mostyn Street
Llandudno
LL30 2RP

Dear Sirs

Re: LDP 2018-33 – Strategic Growth and Spatial Distribution Options.

We write on behalf of our Clients, Beech Developments (NW) Ltd, in order to provide you with their views on the issues discussed in the above document.

Settlement Hierarchy

As your various options generally indicate, the hierarchy should remain one that recognises the primacy of the main settlements as a focus for development, but we also agree that there is scope for an updating of the hierarchy set out in Option One.

- We agree that Llanrwst could usefully be distinguished from the other main urban settlements as it is clearly of a different character, but, nevertheless, has an important role which indicates that it should continue to be developed.
- We also agree that there are significant settlements outside, but well related to the main settlements, where additional growth could be accommodated (not least because some of the main settlements have constraints to their growth and other options will, we believe, be required).
- It appears to us that Option 4 begins to get too complicated, but, in addition, we do not see why some of the settlements identified as Secondary Settlements should be distinguished from the main urban areas, of which they are functionally part or why, for example, Abergele should be 'downgraded' within the hierarchy.

All of the above tends to point us towards Option 3 as the most appropriate of the identified options to be pursued, although, of course, much depends on the way in which development is subsequently distributed (see below).

Growth Options

We agree that the latest Welsh Government household projections are an important element in the assessment of future growth, however, whether one looks at 10 or 15 year migration trends, it must be acknowledged that the period to which, even the 15 year trends relate has been heavily influenced, first of all, by the economic difficulties, including recession, over much, or all, of the period and, secondly, the prolonged shortfall in the housing land supply. Both of these factors will have combined to have a significant impact on development rates and migration such that trend based forecasting alone must be treated with considerable caution.

However, insofar as the trend-based modelling establishes anything, then it demonstrates that housing need arising from these scenarios is also met within an approach that is, in our view, more logically based on employment led projections.

The reasons we say this are largely set out in the Conwy Employment Land Review where fundamental problems with the economy are identified:

- Weak levels of business start-ups.
- Future employment growth forecast to be flat.
- Ageing population, leading to insufficient labour force to fill vacancies.
- Under-representation in productive industries.

An approach that perpetuated a growth rate that was similar to that of the past would only be likely to further the above economic problems and make the County less sustainable in economic terms. What is clearly needed is an approach that sets out to positively address these concerns and, as has been recognised elsewhere, for an employment strategy to be successful there needs to be a commensurate level of housing growth, hence the justification for the employment led projections in these circumstances.

In the light of the above, we have not seen a proper justification for Option 4 which is said to be based on the results of the Employment Land Review in pointing towards a requirement for between 12.6 and 14.3 ha of additional employment land. However, the Employment Land Review appears to assess demand as ranging between 12 and 21 ha of additional employment land being required and, therefore, it is clear that Option 4 scenario is very much at the bottom end of the identified range and appears to offer little to address the fundamental problems with the economy that have been identified.

By contrast, Option 5 is based on the Conwy Economic Growth Strategy which looks to drive forward a higher rate of economic growth resulting in a need for between 18.8 and 24.5 ha of additional employment land (i.e. at the top end, and slightly beyond, the top end of the range identified within the Employment Land Review). Given that this Growth Strategy has been adopted by the Council, it

would seem illogical that the LDP might not then look to put in place a planning strategy that would support the achievement of its goals, most particularly when the Strategy looks to reverse decline and is based on a strategy that has identified significant, specific, opportunities for growth within Conwy.

For the above reasons we consider that Option 5 is the Option that should be pursued.

Spatial distribution

Given our comments in relation to the logic of updating the settlement hierarchy above, we do not support Option One that would merely repeat the distribution within the current LDP, although we acknowledge that the main settlements should continue to be the main focus for development.

No do we support Options 2, 3 and 5 which in their different ways seek to direct all development either to the A55 corridor, to key settlements alone, or to hubs and corridors, there is always a need for balance with the greatest level of growth directed to the most sustainable locations, but an overall sustainable approach must also consider housing needs within the smaller settlements so as to maintain and even improve their viability/vitality in the future.

Whilst we acknowledge that Option 6 relating to a new or expanded settlement could have a role, we believe, in accordance with PPW, that such an approach should only be contemplated when other options have been fully investigated in order to meet the level of identified need (the experience of Denbighshire in seeking to deliver major development at Bodelwyddan should be a lesson to all as to the potential complexity of such an approach).

The above, therefore, points us more towards Option 4 as the most balanced approach, but with the important caveat that local needs should not be forgotten or under-estimated. We note that it is commented that that this Option is more directed towards settlement hierarchy options 4 and 5, which we have not supported, but we see it more as an outline of a general approach to housing distribution and, particularly, as it is noted that the final approach may be a combination of more than one option (page 56), we see no difficulty in identifying it as our preference in terms of the options identified. However, we maintain that the most common sense approach is one that directs the majority of growth to the main sustainable settlements (i.e. Urban, and Satellite Settlements and the Local Service Centre), according to their ability to accommodate such development, whilst also recognising the need and, indeed, opportunity, for smaller developments in appropriate lower category settlements.

We hope that you find these comments helpful and please do not hesitate to contact us if you have any queries.

Yours faithfully

M GILBERT