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## Replacement Local Development Plan Comments Form

Comments are encouraged via the Council's website <http://conwy.jdi-consult.net/ldp> using the on-line form available.

Alternatively, comment forms should be returned to:

**The Strategic Planning Policy Service, Conwy County Borough Council, PO Box 1, Conwy LL30 9GN or by e-mailing [cdll.ldp@conwy.gov.uk](mailto:cdll.ldp@conwy.gov.uk)**

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## Consultation Paper 1: Priority Issues, Vision and Objectives

**Question 1:** *Do you agree that the RLDP Structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in PPW (Edition 10)?*

Paragraph 2.1 of the PPW confirms that, “Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities.”

Paragraph 2.12 also sets out that, “The planning system is a very important policy, decision making and delivery mechanism. It should seek to maximise delivery of outcomes against all aspects of well-being/sustainable development, thus seeking to maximise contributions towards all the goals of the Well-Being of Future Generations (WFG) Act. This can be achieved by adopting a placemaking approach.”

The new PPW 10 builds on the objectives set out in the WFG and has been restructured to reflect the new legislative framework and the five ways of working (prevention, long-term, collaboration, involvement and integration) have been incorporated into the Welsh Government’s long-term vision for land use planning.

The concept of placemaking introduced in this document is a key element to deliver on the aspirations of the WFG Act and drive plan making and development management decisions.

We therefore agree that the RLDP structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in the PPW. This will ensure consistency between local and national policy.

**Question 2:** *Do you think that this is the right Vision for the Conwy RLDP?*

In accordance with paragraph 1.26 of the PPW, “Local Development Plans should set out a vision for how places are expected to change in land-use terms to accommodate development needs over the plan period.”

The proposed vision:

- Promotes growth and a sustainable economy
- Safeguards landscape, heritage and environmental assets
- Focuses on placemaking and regeneration
- Supports housing, employment and infrastructure growth in sustainable locations to meet residents needs
- Protects the Welsh language
- Offers good quality of life for all
- Seeks improved environmental quality and enhanced wellbeing.

The vision therefore supports the core aims and objectives of PPW and WFG Act. Accordingly, it is considered it is the right vision for Conwy which reflects its dynamic geographical location and long term aspirations.

**Question 3:** *Do you think the Vision is well placed to deliver Sustainable Places in Conwy?*

Paragraph 1.2 of the PPW sets out that a well functioning planning system is fundamental for sustainable development and achieving sustainable places. Paragraph 2.13 confirms that the plan-led systems underpins the delivery of sustainable places. The proposed vision should look to maximise the efficient use of land and infrastructure and enhance design quality, it is therefore compatible with achieving sustainable development and in line with national policy. However, it must be acknowledged that the vision alone will not deliver sustainable places. It is important that it allows for the creation of a framework for the preparation of a suite of development management policies that would properly allocate and deliver sustainable development derived from the the vision.

The vision should be expanded to fulfil the requirements of PPW in relation to maximising the efficient use of brownfield, despoiled and previously developed land over greenfield sites in accordance with PPWs aspirations.

***Question 4: Do you agree with the Objectives?***

Yes, in principle, we agree with the proposed objectives as they are aspirational and generally compatible with achieving beneficial sustainability outcomes. On the whole, they appropriately respond to the identified key sustainability issues and planning problems.

***Question 5: Are there any other objectives that should be considered?***

Table 2 identifies a series of key issues and problems followed by a proposed objective to cover the issue/problem. One issue relates to good design, the built environment and placemaking. The supporting text confirms there is a requirement to maximise the efficient use of land and that developments should be of an appropriate scale, siting, massing and density and making the best use of land, including prioritising the redevelopment of brownfield sites. A further issue relates to creating sustainable places and making spatial choices (brownfield land and constrained settlements). This issue acknowledges the lack of brownfield capacity to accommodate growth over the Plan Period.

It is considered the Council should prioritise the use of despoiled / brownfield land within their objectives as this will be essential in ensuring that land is developed efficiently in accordance with the identified issues and the requirements of PPW.

## Consultation Paper 2: Strategic Growth and Spatial Distribution Options

**Question 1:** *Which Settlement Hierarchy do you consider to be the best option? (Refer to Background Paper 3 'Hierarchy of Settlements' for greater assessment of the Options)*

We consider Option 3 to be the best option. This identifies two tiers of settlements within the urban area and a further four tiers within the rural area.

Option 3 classifies 3 of the existing Tier 1 Main villages (Llanddulas, Dwygyfylchi and Glan Conwy) which are located along the A55 as urban satellite settlements recognising their sustainable location and close geographical and functional links with nearby urban settlements. As such these 3 settlements within the urban area and on the edge of the urban area could accommodate greater growth than the main villages in the rural area.

Option 5 provides three tiers within the urban area which are key settlements, secondary settlements and satellite settlements, this option is also supported as it brings forward the Wales Spatial Plan approach along with accessibility and sustainability of current rural locations to urban areas, especially those in close proximity to the A55 corridor.

We support the the provision of additional tiers within the urban area, this supports growth within the areas and settlements such as Llanddulas which have the higher amount of facilities and services and with the capacity and infrastructure to accommodate development. We discuss this in more detail in our response to Q11.

**Question 2:** *Are there any other settlement hierarchy options you would like to put forward?*

[Click here to enter text.](#)

**Question 3:** *Do you agree with the figures and rationale for Growth Option 1?*

This growth option scores negatively in the majority of the sustainability appraisal objectives. If progressed it would result in depopulation and a decline in the working age population. The quality of community facilities is likely to decline as working age population declines.

This would also result in a reduction in existing housing land supply meaning that housing provision would continue to fail to meet identified needs and the shortfall would be exacerbated. Without new allocations there would be no mechanism to deliver additional affordable housing. This growth option is predicated on a rate of growth below past trends and the current predicted level of objectively assessed housing need, which is likely to lead to worsening of affordability and housing need issues. This option is based on an update of the official 2014-based projections using the same methodology, given that the economic impacts of this option would result in no job growth and no housing allocations, it is not considered this option should be progressed. The RLDP should be aspirational in achieving economic development and growth and seek to ensure a continued supply of land is available to meet long terms needs.

**Question 4:** *Do you agree with the figures and rationale for Growth Option 2?*

This growth option scores positively in the majority of sustainability appraisal objectives. This scenario uses a 10 year migration trend based on data for the 10 years between 2007/2008 and mid 2016/2017. This growth option is likely to support improved health and wellbeing outcomes through facilitating growth of the working age opulation and the provision of associated economic opportunities.

With regards to housing, the growth option plans to meet the forecasted growth levels which presume achievable levels of affordable housing. All growth options with the exception of growth option 1 involve new housing and employment land allocations which result in land-take. Depending on the extent to which greenfield land is used and the characteristics of individual development sites, the levels of housing and employment growth under each growth option could result in adverse effects on ecological, geodiversity and soil interests. With regards to sustainable placemaking a key objective of the PPW, this growth option is considered to likely to have positive effects on this objective as the levels of housing and employment growth they would entail a manageable scale of development to

improve existing places and infrastructure without requiring a scale so substantial that places would be over-burdened or land would be likely to be used inefficiently.

***Question 5: Do you agree with the figures and rationale for Growth Option 3?***

This scenario has the same methodology as option 2, but uses a 15 year migration trend based on data for the 15 years between 2002/2003 and mid 2016/2017. The rationale behind this methodology is supported. It is considered this will result in improved health and wellbeing outcomes through facilitating growth of the working age population and the provision of associated economic opportunities. With regards to housing, this growth option plans to meet forecasted growth levels which presume achievable levels of affordable housing, it is based on higher levels of population and housing growth than option 2, but is still within the range of recent housing delivery. Given that the growth option involves new housing and employment land allocations which would result in land-take. Depending on the extent to which greenfield land is used, the levels of housing and employment growth could result in adverse effects on ecological, geodiversity and soil interests.

***Question 6: Do you agree with the figures and rationale for Growth Option 4?***

This employment led projection would seek to deliver 1,850 jobs and 5,250 dwellings, the sustainability appraisal confirms that the growth option will allow job creation and in-migration of working age skilled population. It is considered the employment led projections are more aspirational and therefore the rationale is supported. With regards to housing the option plans to meet forecasted growth levels which presume achievable levels of affordable housing. It would also provide additional employment land which would support future economic growth.

With regards to sustainable placemaking, this growth option is considered likely to have positive effects on this objective as the levels of housing and employment growth they entail would be a manageable scale of development to improve existing places and infrastructure.

***Question 7: Do you agree with the figures and rationale for Growth Option 5?***

This growth option would result in 3,500 jobs and 7,150 dwellings. This option is based on an aspirational jobs growth which is informed by the Conwy Economic Growth Strategy, the levels of growth are high, however if this level of growth was to be met, it would help the Council to meet their shortfall in housing supply over the plan period. However further testing would be required to ensure that this is not over ambitious and undeliverable and result in an over-allocation of housing above need and unsustainable growth.

***Question 8: Do you agree with the figures and rationale for Growth Option 6?***

No longer being considered by the Council

***Question 9: What is your preferred growth option?***

Option 4 is our preferred growth option. This seeks to deliver 1,850 jobs and 5,250 dwellings over the 15 year plan period. This growth option is based on aspirations within the Conwy Economic Growth Strategy which trends forward past job growth, however it does not seek as high levels of growth as Option 5. It also takes into account sectoral employment analysis and national economic trends. Given that the growth option is job driven, in-migration sees growth in the working age population which supports the aspirations within the draft RLDP of economic growth and a more balanced population structure. It is considered that this would result in aspirational and realistic growth across the County.

Option 3 may also contain reasonable growth assumptions given that it uses some of the same methodology and assumptions as used in office Welsh Government projections and updates them with the latest available data. The propensity model helps to mitigate the impact of trend toward outward migration amongst young adults and sees growth in the working age population which supports the aspirations within the draft RLDP of economic growth and a more balanced population structure. However it must be acknowledged that given the Council have not been meeting their existing growth targets, the RLDP must be aspirational so that it can meet the existing and projected need as well as the shortfall. Option 5 would seek to achieve this over the plan period.

***Question 10: Are there any other options we should include?***

Growth Option 5 looks to achieve significantly higher levels of growth than has been taking place historically within Conwy. However it is essential that the RLDP is able to deliver the required level of housing and employment growth which not only meets the needs going forward but also considers the significant shortfall that the Council currently have. As such a further growth option which seeks to provide a higher level of growth than Option 4 but not as high as Option 5 would be supported.

**Question 11: What is your preferred spatial growth option?**

Sustainable distribution Option 4 (Focused urban growth in line with the Wales and Spatial Plan and within Satellite Settlements) is preferred. This will direct development in line with the Wales Spatial Plan to Primary Key Settlements and Satellite Settlements with the capacity and infrastructure to accommodate development. It acknowledges that in the rural area a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about delivering local needs whilst protecting local character and the open countryside. By focusing on this wider growth option, it ensures the role of other sustainable settlements are not overlooked. In addition to this, unlike Option 3 (Focused growth in line with the Wales Spatial Plan) by focusing growth into the Satellite Settlements, it will likely have less impact on the capacity of infrastructure and put less pressure on a wide range of physical and environmental constraints.

This option also enables relatively unconstrained and sustainable settlements outside of the higher order tiers to be considered.

With regards to brownfield land development, this option has the necessary mechanism in place to promote brownfield land due to targeting development within and on the edge the Primary Key and Satellite Settlements. It is acknowledged by the Council that there is not enough capacity within brownfield sites to deliver the proposed growth targets and as such greenfield sites will be required. Prioritising the use of brownfield or despoiled land where available in and on the edge these settlements will ensure that land is used efficiently in accordance with the RLDP and PPW.

This option also scores well when assessed against the sustainability appraisal objectives. The option would see growth focused on urban areas where sustainable and active travel modes are most likely to be available.

This option is closely aligned with Conwy's Economic Strategy focusing growth on the A55 corridor. With regards to transport and communications. It is also in line with the Wales Spatial Plan which would see growth focussed in the most accessible locations. As a result of this, a positive effect is predicted on the biodiversity, geodiversity and soil sustainability appraisal objective as there is scope to allocate land in sustainable settlements on the edge of this corridor. There is therefore enough flexibility to address the development pressures on biodiversity, soil and geodiversity.

Growth would be directed towards the highest demand housing locations whilst avoiding some of the more constrained and low demand locations. In accordance with the sustainability appraisal objective relating to housing, this option would directly support the delivery of new housing to meet identified needs. This option does not distribute housing growth to the lower tiers like Option 1 (current LDP) however, it acknowledges in the rural area, a more refined policy approach would be developed to ensure that a more flexible approach is taken.

We have provided below a brief commentary on each of the spatial distributions options.

Spatial Distribution Option 1 (Repeating the adopted LDP) is based on the current LDP approach which allows for a proportional distribution of development based on sustainability principles across three tiers of the currently adopted hierarchy of settlements. This option scores poorly against a large number of the sustainability appraisal objectives, the location of some employment and land allocations distributed across the hierarchy are constrained in some rural areas and to the east of the County. Coupled with the fact that national guidance seeks to locate housing and employment in close proximity to assist sustainability, it is considered that the current LDP strategy is not best placed to deliver wider strategies. If progressed, this could result in spreading growth too thinly as the proportional distribution gives the impression that most settlements will need to grow or have an allocation.

The key weakness of Option 2 (distributing growth to all the urban centres along the A55 corridor) is

that it only focuses growth on the urban areas within the settlement hierarchy, which tend to be the most sustainable locations to accommodate growth. There will be rural settlements lower down in the settlement hierarchy that are in sustainable locations that would be denied growth under this option as it would see growth spread around the most urban settlements irrespective of where evidence suggests demand is located.

As above, Option 3 (Focused urban growth in line with the Wales Spatial Plan) does not focus any growth within sustainable rural settlements and locations and if progressed could place pressure on infrastructure if growth is too tightly focused. Unconstrained and sustainable settlements outside the higher tiers would be prevented from contributing to some growth.

Option 5 ( Hubs and Corridors) scores positively in the majority of sustainability appraisal objectives and would be suited to all of the settlement hierarchy options. However it is acknowledged that focusing growth on transport hubs and corridors would have mixed results. Growth would be focused within the sustainable locations identified, however further development along the A470 and A5 could encourage greater car use. This option would also result in additional development pressure on those settlements along transport corridors and strategic hubs, which may not be suitable. This option is also not considered to have a sufficient level of flexibility to withstand unforeseen circumstances and limited mechanisms to promote brownfield land.

Option 6 (New Settlement) does not score positively within any of the sustainability appraisal objectives. This option would be inflexible to changes in circumstance and have limited mechanisms to promote brownfield land. It is acknowledged that the Council has a severe shortfall in meeting its 5 year housing supply (3.1 years at 1st April 2018 according to BP8), and as such the allocation of a new settlement to meet 1000 dwellings would go some way to meet the shortfall. However, there are significant time delays associated with progressing a new settlement that could result in the creation of a further shortfall of development over the plan period and it is unlikely that all dwellings would be built out within the plan period.

**Question 12: Are there any other options we should include?**

As with the Settlement hierarchy options, it is considered that a hybrid option of more than one spatial distribution option could be the best option to progress.

As discussed above, we are of the view that option 4 is the most suitable spatial distribution option, however, a hybrid option which reflects the settlement hierarchy set out in settlement hierarchy options 3 and 5 would also seek to deliver sustainable growth, this would ensure that the majority of growth occurs within the top tier urban settlements which are best suited to accommodate further growth, whilst still allowing for a moderate level of growth within the most sustainable rural settlements where it can meet a recognised need.

*(Continue on a separate sheet /expand box if necessary)*

Signature:



Date

21/01/2018

**Publication of your comments:**

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