

## Conway Council Preferred Strategy Consultation 6080.27991-28008

### Preferred Strategy

The HBF supports the proposal to focus growth within the two strategic areas, the Coastal Development Strategy Area (CDSA) and the Rural Development Strategy Area (RDSA).

The HBF supports the inclusion of a 20% flexibility allowance.

The HBF supports the split between Social rented and Low-Cost Home Ownership which will be applied with an element of flexibility to take account of local and changing characteristics of settlements.

The HBF supports in principle an economic led growth strategy but consider the plan is not currently ambitious enough in terms of its planned growth.

The HBF objects to the level of housing proposed by the plan.

### Strategic Policy 2 (SP/2): Levels of Housing Growth

The HBF considers that the proposed level of growth is not aspirational enough and although based on an economic led strategy, it is not one which takes full account of the potential of the area and the wider aspirations of North Wales. By limiting the housing growth as suggested it reduces the potential benefits which could help reduce several the identified issues that the County will encourage in the future, including ageing population, outmigration of employment aged people and higher levels of deaths than births. The HBF contends that by being more ambitious and planning to reverse these identified trends it will have wide reaching economic social and health implications.

The preferred growth option in terms of economic growth relies on the allocation of between 12-14 ha of employment land whereas the findings of the Councils BP 18 Conwy Employment Land Review recommended employment land requirement range is 12 ha to 21 ha. The council would appear to have chosen the lowest level of land provision resulting in a low level of jobs created.

Whilst 1850 jobs may "help match" aspirations for economic growth, it is at odds with the Council's adopted approach. The Conwy Economic Growth Strategy proposes the creation of 3,500 new jobs in the period 2017 - 2027, consequently the proposal to create 1850 jobs within the Plan period at an average of 123 jobs per annum, is just 35% of the Council adopted rate. [Also see comments to BP 01: Growth Level Options Report below].

The HBF objects to the suggestion at para 3.3.5 'It is clear that a number of the Strategic Sites need to be phased appropriately in order to meet the Band 'B' and 'C' School Modernisation Programme over the Plan Period.' We do not believe that the need to deliver new schools should be a reason to phase development.

### Comments on Strategic Policies



Strategic Policy 3: Levels of Employment Growth - The HBF supports the proposed levels of growth but question whether or not they could be more ambitious in line with the Councils own adopted Economic Growth Strategy.

Strategic Policy 5: Placemaking and Good Design - The HBF notes that this appears to repeat SP 1: Sustainable Placemaking Principles, so questions the need for the policy.

Strategic Policy 12: Infrastructure and New Development - The HBF suggests that some additional wording is added to the following paragraph as indicated by the underlined text.

*3.13.6 On-site provision is the preferred option, particularly for obligations such as affordable housing and recreational spaces. Where necessary, the developer will be responsible for the future upkeep of the obligation. Development should not take place before the infrastructure needed by its occupants is in place or in agreement with a phased approach based on agreed triggers. Unless otherwise stated, there are no exceptions.*

Strategic Policy 15 (SP/15): Housing - The HBF requests that in point 1 the word 'approximately' should be replaced by the words 'minimum of' and the word 'contingency' be changed to flexibility to avoid confusion. The HBF also objects to the housing figure as discussed elsewhere in our comments.

Strategic Policy 18 (SP/18) - The HBF objects to para 4.68 '*Financial viability will be a consideration. The developer will be responsible for the maintenance of any new recreational spaces in perpetuity.*' Although the management of open space in some cases may need to be carried out by an organisation other than the Council this should not be the default position but instead an option along with the ability for the Council to adopt the facility.

Para. 2.31 states '*The new Strategy will plan for the right type and mix of housing to take account of smaller households and adapted living for the elderly*'. Whilst we have no objection to this in principle in relation to affordable housing, we do object to nay level of control which the Council intend to impose through policy on the private homes for sale element of any new development. Also please see comments on supporting document BPO1 below.

## Supporting Documents

In addition to the above comments on the Preferred Strategy the following comments are made regarding the supporting documents.

### **BP 01: Growth Level Options Report - July 2019**

Although the HBF supports the proposal economic growth led strategy it suggests that the plan could have gone further to encourage greater economic growth particularly recent developments around the North Wales Growth Deal and the recently published draft NDF, which identifies the North of Wales as an economic growth area. The Option of 1,800 new jobs is well below the alternative economic led growth option (scenario 3) of 5,480 new jobs.

The HBF notes that at para 3.3 the Councils highlights the importance of establishing the understanding between job growth and population growth. However, in line with comments made here and elsewhere in our response, we do not consider that based on the Councils evidence documents that the current growth levels meet the right balance between these factors and therefore run the risk of constraining development based on a lack of ambition and enough land being allocated for the new homes needed.



In support of this the HBF notes that the Development Plans Manual (3rd Edition Draft due to be adopted in October 2019) indicates at paragraph 5.50 that *“The critical point is ensuring that both economic and housing growth are broadly aligned, accepting that there is no direct mathematical relationship. Both forecasts and the scale of growth should be aligned to support each other.”* The scale of growth proposed by the Preferred Strategy, far from supporting the Councils approach to the economy, actually appears likely to constrain such growth and, at the same time increase pressures for unsustainable in-commuting contrary to the wording above and wider sustainability aspirations set out in a number of Welsh Government documents including the draft NDF.

### Housing Mix

Although the HBF has no objection in principle to the mix of affordable housing on any site being linked closely to need as expressed in the Local Housing Market Assessment (LHMA), so long as the document is kept up to date. We however do not agree that the mix of market housing on a site might be controlled in a similar fashion.

The Housebuilders business is based on the need to respond to the market, a product for which there is no demand will simply not sell. Although it is accepted that current LHMA does identify a need for smaller properties this relates in the main to affordable housing and not the private sector. Private purchases will often buy a big home giving them the flexibility to have visitors stay, work from home and allow for the potential for a growing family without the need to move home or extend the property. We do not consider it is appropriate for the Council to control and potentially limit this from happening by insisting on a higher percentage of smaller homes on private sites.

## **BP07: Housing Land Supply - May 2019**

### Commitments

Sites outside of the five years fall into two categories in the JHLAs process, those in CAT3 which often are the residual element of a scheme which due to expected delivery rates will not be delivered in five years, the HBF has no objection to these sites being included within the commitments. However, sites can also be in CAT4 where delivery is not predicted due to a major physical constraint. The HBF considers that these sites should not be included in the commitment’s calculation.

### Windfalls

The Council recognise that many of the windfalls in the next few years will be made up from sites already committed (with planning). However, the Housing Trajectory does not account for this, as it uses a flat level of windfalls across all years of the plan. The Council also notes that the delivery of windfalls sites has heavily relied on the RSLs further noting that due to likely changes in funding this supply is likely to reduce. However, the Council do not reduce the level of windfalls accordingly instead suggesting that grant will be replaced by the ability to cross subsidise a site with private sales a form of development which has no track record in Conway and is in its infancy across Wales so should not be relied on to maintain levels of windfall.

### LDP allocations

The documents wording suggests rightly that not all allocations will come forward, two reasons are given based on evidence from the past, although it is accepted that a different view on car parking could be



taken, a reduction resulting from the physical nature of the site will not change. Accordingly, in line with the Development Plan led manual Table 18 the HBF suggests that the total of commitments included in the housing supply calculation should be discounted to take account of the recognised likelihood of non-delivery from allocated sites. To be clear this is a different issue to the flexibility allowance. As an absolute minimum it is suggested that that the number of units assigned to any previously allocated site included in the plan is carefully reviewed and reduced based on the reasons the Council have identified in the document.

#### Factors influencing underdeliver

Conway Council's own a significant number of the currently allocated sites and many of these that have not come forward to date. Based on the 2018 JHLAS [noting that several the proformas do not contain ownership details] the HBF believes that 440 units or 11% of the total units allocated are owned by the Council had have not yet come forward. This needs to be considered when looking at allocation of Council owned land in this review of the plan.

## **Topic Paper 1 - Housing**

### LDP AMR findings and Review Report Conclusions

Table P15 HOU/7 - Council and Government owned sites in the plan area.

The HBF does not consider the answer given is reasonable, sites either have come forward or haven't. The council simply needs to look at the number of units allocated on these types of sites at the start of the plan and then look at how many have been delivered to date. This simple comparison will clearly show if the policy is working or not.

### New home building in CCBC Graph P17

The supporting text around this graph is very negative and leads the Council to a reason for reducing the housing requirement. However, the last two years of the graph show a significant increase in the level of housing delivery compared to the overall housing delivery in Wales which dropped slightly. This should be seen as a positive and rather than using the negative trends of the previous years should be used to ensure that plan does plan for a continued upturn in house building in Conway. This trend is further highlighted by the table on P18 which shows that last year that the private house building element of new delivery significantly increased. The graph on P18 also indicates a sizeable reducing in the level of affordable housing delivered through grant, this supports the Councils own position regarding future windfalls as discussed elsewhere in HBFs comments.

P18/19 the comment about 100% affordable homes will need to be revisited in line with the Recent Ministers letter to LPA's, suggesting a change in the requirements of PPW10.

P21 The HBF suggests that consideration of deallocation should not only apply to 'long standing site allocations' but to any site where it cannot be shown that it will come forward in the plan period. It is not considered necessary to include a policy in the plan to this affect, as once the site is in the adopted plan then it's too late, it's no longer a policy decision. Deallocation is a consideration for the candidate site stage and the assessment of the existing commitments within the plan as discussed elsewhere in HBF's comments.



### **BP09 - LHMA 2018-33**

The HBF notes that the affordable housing need calculation 'looks at current and future housing need', which we have no issue with, however, this figure is then considered against the overall housing need figure which is calculated using past trends and takes no account of any backlog as a result of under delivery. The HBF believes that this relationship needs to be explained to justify how these opposing approaches can come together to influence the housing growth target within the plan.

### **BP10: Affordable Housing Viability Summary Paper - July 2019**

The HBF questions the purpose and role of this paper in the Plan process, why is a separate summary document required. The issue considered which is the percentage level of affordable housing required across the County Borough can only be considered with all of the information.

### **BP11: Affordable Housing Needs Calculation - July 2019**

The HBF questions why are the Council choosing to use a different methodology to the latest WG one? There appears to be no explanation for this in the document.

Based on the comparison between the different methods used shown in Table 1 the HBF objects to the proposed growth option as it would result in a higher level of affordable homes being provided, above the identified need.

