

Kerry Anne Wain

From: KEITH EVANS
 Sent: 26 November 2017 16:12
 To: CDL
 Subject: Review Report Consultation - Conwy LDP.

Dear All,

I hereby make my submissions to the LDP Review Report within the timescale provided.

I do so as a local resident.

The items I wish to comment on are as follows:-

Paragraph 5.2.4 - A review of the land allocations is overdue and there is evidence of local hoarding of land to the disadvantage of other applicants.

Only genuine sites of over 10 units should be retained and all unrealistic allocations removed. Contingency sites need to be removed entirely as none have been used despite a 3.1 year undersupply situation. I also support a review of the boundaries of settlements as they are too tightly defined so as not to accommodate sustainable developments and windfalls. It is counterproductive especially when rural settlements have had bus services removed or diluted by cuts from the local authority. The rural settlement strategy requires review to bring it in line with the council ambition for villages and some need to be downgraded and others upgraded and yet others declassified as having no sustainable future with no school or public transport together.

I would also like the new LDP to set a upper limit on any site attempting to circumvent the LDP at 20 dwellings on green field land only if allocated sites are not built on first after this review. Its time to stop leapfrogging boundaries during plan periods.

In this way a fair share of housing supply and choice is provided and be a stimulus to local competition in housing and new entrants. It would also provide regeneration emphasis.

A review of green barriers should link in with this work on settlements as some green barriers are becoming fossilised as Green Belts not flexible instruments they are meant to be.

The housing allocations in LLanfairfechan need to be updated and old unused ones removed, as in Penmaenmawr.

Colwyn Bay housing supply needs increasing.

Paragraph 5.6.14 - The use of the word *poor design* in the LDP report is not well chosen, when we see examples of out of scale public buildings out of context being approved for use by

the public sector but not in the private sector locally. The problem has been of the Council being unable to articulate its design ambitions when asked leading to uncertainty. Generic policies are being hidden behind with little understanding of the issues that apply. If a policy is tacked on which deals with architecture and landscape architecture then that may be of more use than using words such as poor design which is plainly reliant on no objective assessments most of the time and no level playing field applied. This also applies to heritage assessments that also lack rigour under the new system.

Paragraph 5.5.7 -

Open space allocations seem to be out of step with the LDP evidence with some areas having unchanged major shortfalls of open space for the LDP period.

Housing allocation led growth has not occurred to try and meet with some of this strategic shortfall. The council must allocate land and deal with these deficits itself next rather than rely on others to do it for them. By doing that it can spend the planning gain money and commit to the o/s maintenance for over 20yrs. I am also concerned to hear of rumours to build cheap homes on allotment land which favours RSAs. I believe that loophole requires plugging in the LDP and I shall be asking for a policy on that. If others cannot build on open space no one else should either, unless the LDP Policy is rewritten to properly reflect the Ministerial 2017 statement on open space in Wales from Fields In Trust. At present the open space policy wording is not in compliance with WAG policy. See the recent JGYMLP for its policy wording.

A review is thus welcomed and should link to housing and AH reviews.

Paragraph 5.6.15 - Welcome the review on this item.

Paragraph 5.4.10 - Welcome a review on this item too as the tourism sector is diversifying as quick as the LDP review. The policy needs to be more clear on pods and huts (eg not counting them as caravans which they are not or stop sites other than working farms from having rural pods or huts which is quite unfair). I see the need to sharpen up the words on extensions to existing caravan sites to allow no new caravans on green fields at all under any circumstance. Only existing caravan sites to benefit in future. Also, no ratcheting of caravans for chalets to be allowed at all on existing sites other than lodges for caravans.

Paragraph 5.3.16 - Welcome the review of EMP4 as I am its arch critic. It has been excessively used as a blunt object to harm local small business on some assumption that doing nothing is better than helping our own local business people consolidate, move or diversify. The B class is quite out of date with modern e trading and commerce outwith the public sector who still have B1 uses.

Paragraph 5.3.10 - Welcome an early review of EMP6 as it has also caused unintended hardships and trapped people when its now shown that the LDP shows no demands for employment for B1. How was such a policy allowed to be applied one wonders if the evidence did not exist but a residential need was there under HOU1/2.

Paragraph 5.28 - This policy has led to a virtual stop in new conversions harming the supply of homes in rural areas at a time when village supply has also

been brought to a near halt. The policy is in need of review so I would build in more flexible criteria to kickstart rural hopes.

I have read the ideas about the Welsh Language policies and welcome moves (albeit late) to improve and focus assessments for development types that matter.

I think in future WLIA locally needs to focus more on housebuilding of 25plus on greenfields with a special emphasis on the 40 plus house scheme. It also needs to deal with school closures and loss of public transport links and public services in future, not shops. As regards mapping linguistic areas at risk I remain to be convinced that will reverse years of public policies which have undone their special fabric and would not add to controversy. I dont see how that can be done with any degree of accuracy at present to be helpful.

. It would have been better to concentrate on stemming the decanting of old and young from these places than looking at the after event too late.

Flooding policies require review for the coast after NRW has lowered its thresholds and has stated it is not intending to invest in coast defences thereby prejudicing development and land uses in Conwy. The implications for no go areas need to be mapped again.

Retail is altering radically

with e retail so the Council must consider if most of its primary retail areas will survive the next 5 yrs unscathed and if B8 use are largely unrequired. Retail park land allocations may also require review as these patterns fragment.

I look forward to the public being allowed to submit their realistic new housing land allocations to the Council to enable the LDP to be updated as quick as possible.

Yours sincerely,
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