

**For Office Use Only**

Date Received:

Comment Number:

Customer Number:

Local Development Plan Review Report 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, Library Building, Mostyn Street, LLANDUDNO, LL30 2RP or by either e-mailing cdll.ldp@conwy.gov.uk

This consultation is limited to comments on the **LDP Review Report**. It is not an opportunity to comment on the existing Local Development Plan; to submit land for consideration for inclusion or to state any changes you may want to see made in the replacement Local Development Plan. This will come at a later stage.

| 1. Personal Details | | 2. Agent Details (if any) | |
|---------------------|----------------------------------|---------------------------|--|
| Title | Mr | Mr | |
| First Name | David | Phil | |
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* Where relevant

Please indicate which paragraph(s) you wish to make comment on*:

4.11, 5.2.4, 5.3.2, 5.3.6, 5.3.7, 5.3.9, 5.4.7, 5.4.9, 5.4.10

* Please photocopy this sheet if you require more space and append additional sheets to this form.

Please set out your comment(s) in the order they appear in the Review Report below:

4.11 - Support – The review should consider larger scale windfall developments and allocations within and adjacent to Tier 1 Villages in order to achieve shortfalls in the Rural Development Strategy Areas (RDSA) identified in paragraph 4.5.

5.2.4 - Support – Housing land allocations should be reviewed and new deliverable sites allocated through a call for candidate sites. In addition, windfall site and allocations within and adjacent to in Tier 1 villages should not be capped in size as this limits the ability of the market to deliver housing where there is a demand and which otherwise would be consistent with the thrust of the LDP.

5.3.2 - Support – Employment Land allocations should be reviewed to ensure that the location and supply of allocated sites matches the market demand, including land outside the Urban Development Strategy Areas, but with good access to the A55.

5.3.6 - Support – Additional work is required to ensure that employment land is located in locations driven by market forces to ensure early take up and development.

5.3.7 - Support – Revised policy wording should consider allowing flexibility to allow market driven unallocated windfall employment sites to come forward outside Urban Development Strategy Areas (UDSA) and Rural Development Strategy Areas (RDSA) where they will address a specific need and comply with the thrust of other policies in the LDP.

5.3.9 - Support – List of employment sites should be reviewed to include brownfield land and waste sites which have the necessary infrastructure to support employment uses. Policy MWS/7 supports the use of industrial land for waste management facilities due to the compatible nature of built waste facilities and it is suggested that Policies EMP/3,4 and 5 should contain reciprocal wording to allow waste sites to be developed for employment uses provided that this would not result in a shortfall in the required number of waste management facilities.

5.4.7 - Object – Policy TOU/2 limits new tourism and recreational development to UDSA and RDSA. Review should be more comprehensive to give a greater degree of flexibility to deliver appropriate tourism and recreation developments outside of these areas.

5.4.9 - Support – We support a review of policy TOU/3 and it should be revised to promote new sustainable holiday accommodation outside the Holiday Accommodation Zones in Llandudno. This would widen the tourism offer within Conwy and promote the wider distribution of tourism income across the County.

5.4.10 - Support - We support a review of Policy TOU/4 'Chalet, Caravan and Camping Sites' to promote 'alternative camping' and suggest that eco lodges should be included in the list along with yurts, pods and shepherds huts.

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

Signature:

Date

21-12-2017

Publication of your comments:

Please note that all comments received will be made available publicly and published on the Councils website

Please indicate which paragraph(s) you wish to make comment on*:

5.9.2, 5.9.5, 5.9.7

* Please photocopy this sheet if you require more space and append additional sheets to this form.

Please set out your comment(s) in the order they appear in the Review Report below:

5.9.2 - Object – Whilst policy MWS/3 for safeguarding mineral reserves remains relevant the areas shown on the Proposals Map need to be comprehensively reviewed to ensure internal consistency with Policy MWS/4 and MTAN 1 in terms of buffer zones. For example, a number of areas within and adjacent to Llanddulas Quarry could not be quarried due to residential property within the 200m and 100m buffers for hard rock and sand and gravel respectively, promoted in MTAN 1 and MWS/4. As such these and similar areas should be removed from the safeguarded minerals areas so as not to preclude alternative developments at these locations.

5.9.5 - Support – We support a call for additional waste sites/quotas as part of employment land allocations, but consider that safeguarding of waste sites solely for waste uses is no longer necessary given that Policy MWS/7 supports the use of other industrial land for waste management facilities and National policy now requires LPAs to consider waste as part of an employment land review. Allocation of sites solely for Waste Management has not delivered facilities at these locations and reviewing policy to allow greater flexibility for the market to deliver waste and employment sites where they are best suited should be considered.

5.9.7 - Object – Policy MWS/8 is considered too restrictive. NRW guidance and reasoned justification to Policy MWS/8 implies that for development with 250m of a landfill the EHO and NRW must be consulted. This would imply that individual applications located within the landfill buffer zone will be assessed on their merits based on a risk based assessment. It is suggested that the policy is reworded to make it explicit that development within the zone would be allowed subject to a risk based assessment. For closed landfills this should be focussed on potential for gas migration, as other amenity issues and avoiding potential constraints on landfill operators would no longer be relevant.

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

Signature:

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Publication of your comments:

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Please indicate which paragraph(s) you wish to make comment on*:

11.1.2, 11.1.3, 11.1.4, 11.1.9,

* Please photocopy this sheet if you require more space and append additional sheets to this form.

Please set out your comment(s) in the order they appear in the Review Report below:

Appendix 3 – Review of LDP Policy Effectiveness - Summary – Policies HOU/1, HOU/2, EMP/3 and TOU/2 should have a more comprehensive review to allow greater flexibility for the market to deliver much needed housing, employment and tourism development. Policies MWS/4, MWS/6 and MWS/8 should have a more comprehensive review to ensure that they do not sterilise potential developments sites that could otherwise come forward.

11.1.2 - Object- Policies HOU/1 and HOU/2 should have caps on the number of dwellings outside allocated sites and settlement boundaries removed in favour of a criteria based policy. This would allow appropriate windfall developments to come forward and maximise housing supply in a sustainable manner, rather than being constrained by an arbitrary cap. This will allow smaller local developers to more effectively deliver the necessary housing through windfall sites.

11.1.3 - Object -Revised policy wording for EMP/3 should be considered to allow flexibility for market driven unallocated windfall employment sites to come forward outside Urban Development Strategy Areas (UDSA) and Rural Development Strategy Areas (RDSA) where they will address a specific need and comply with the thrust of other policies in the LDP.

11.1.4 - Object –Policy TOU/2 limits new tourism and recreational development to within UDSA and RDSA. Review should be more comprehensive to give a greater degree of flexibility to deliver appropriate tourism and recreation developments outside of these areas.

11.1.9 - Object – Whilst Policy MWS/3 for safeguarding mineral reserves remains relevant the areas shown on the Proposals Map need to be comprehensively reviewed to ensure internal consistency with Policy MWS/4 and MTAN 1 in terms of buffer zones to ensure only those areas that are actually deliverable in the long term are safeguarded. For example, a number of areas within and adjacent to Llanddulas Quarry could not be quarried due residential property within the 200m and 100m buffers for hard rock and sand and gravel respectively, promoted in MTAN 1 and MWS/4. As such these and similar areas should be removed from the safeguarded minerals areas so as not to preclude alternative developments.

The need for Policy MWS/6 safeguarding of waste sites solely for waste uses should be reviewed given that Policy MWS/7 supports the use of other industrial land for waste management facilities and National Policy now requires LPAs to consider waste as part of an employment land review.

Policy MWS/8 is considered too restrictive. NRW guidance and reasoned justification to Policy MWS/8 implies that for development with 250m of a landfill the EHO and NRW must be consulted. This would imply that individual applications located within the landfill buffer zone will be assessed on their merits based on a risk based assessment. It is suggested that the policy is reworded to make it explicit that development within the zone would be allowed subject to a risk based assessment. For closed landfills this should be focussed on potential for gas migration, as other amenity issues and avoiding potential constraints on landfill operators would no longer be

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