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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

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* Where relevant

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)?*

The HBF's understanding is that an LDP needs to take account of and be in line with any national policy or other relevant legislation, however, this does not mean that the plan must follow the same structure. The main concern the HBF have with the proposed approach is that it does not clearly show the cross-cutting nature of housing and its links to employment and health in particular. We note that the published version of PPW was quite different to the draft version referred to in this consultation so the RLDP will need to be amended to take account of these changes.

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

The HBF suggests that the proposed vision is overly complicated/wordy. The HBF considers that there is some confusion/conflict which has been created by the published version of PPW between placemaking and sustainable places but understand that this is not for Conwy Council to resolve. The HBF are however supportive of it linking the role of new housing, employment and infrastructure delivery.

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

As stated above the HBF considers that the vision seems overly complicated and wordy. A sustainable place is often hard to define and the added requirement for 'placemaking' adds an additional consideration. In its self the vision can not deliver sustainable places, it's the objectives, spatial strategy, the policies and ultimately the interpretation and implementation of those policies which deliver development.

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

Although the HBF are supportive of Housing being included within Objective Strategic Objective 2 (SO2): Key issues and problems, we are particularly concerned about the suggestion that 'There is a need to ensure that the growth level applied in the RLDP takes into account the capacity of the home building industry to deliver'. This suggests that the only reason the previous plan has not delivered at the rate expected is because of developer capacity which is clearly not the case and has not be evidenced in the plans supporting documents. The HBF consider that there are several other reasons why delivery has not met the delivery levels in the LDP such as allocated sites not being deliverable for a variety of reason, external factors such as the market, skills and material shortages and the wider economy. The HBF have previously identified that the largest single landowner restricting the sale of allocated housing land is Conwy County Borough Council clearly another factor in the delivery rates achieved. The HBF consider that Housing is cross-cutting and sits across a number of the other Objectives and is considered to be equally as important as part of Objective SO1 Placemaking and also relates to the economy and environmental objectives of the plan.

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

The HBF suggests that an additional objective should be entitled 'infrastructure' this should describe the need to provide a range of infrastructure elements, such as transport, schools, employment to support the delivery of new homes and assist in the placemaking and sustainability agenda.

Consultation Paper 2: Strategic Growth and Spatial Distribution Options

<p>Question 1: <i>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)</i></p>
<p>The HBF is concerned that the first three options either relate or are based on the previous LDP Settlement Hierarchy which has not delivered the homes required to meet the identified need of the current plan. Option 4 is based on the Wales Spatial Plan which although technically not yet replaced was adopted in 2004 and last updated in 2008. It will shortly be replaced by the NDF and possibly a SDP for North Wales, although the timings of these new plans do not align with the replacement Conway LDP it does not seem appropriate to base a plan on principles established by such an old plan. Option 5 is a hybrid of earlier options which we have commented on above. The HBF suggests that although we may not agree with the wording that describes the options either options 3 or 5 offer the largest number of settlements and thus the greatest opportunity increasing the chances of meeting the demands of the authority with regard to housing delivery.</p>
<p>Question 2: <i>Are there any other settlement hierarchy options you would like to put forward?</i></p>
<p>The HBF do not wish to put forward any other specific settlement hierarchy, but would suggest that the Council needs to consider a hybrid option of 3 and 5 with the added consideration of market demand which should take account of where people would like to live.</p>
<p>Question 3: <i>Do you agree with the figures and rationale for Growth Option 1?</i></p>
<p>The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not deliver the housing growth needed to not only support the economic aspirations of the Council but also deliver the much needed affordable housing.</p>
<p>Question 4: <i>Do you agree with the figures and rationale for Growth Option 2?</i></p>
<p>The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not deliver the housing growth needed to not only support the economic aspirations of the Council but also deliver the much needed affordable housing.</p>
<p>Question 5: <i>Do you agree with the figures and rationale for Growth Option 3?</i></p>
<p>The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not deliver the housing growth needed to not only support the economic aspirations of the Council but also deliver the much needed affordable housing.</p>
<p>Question 6: <i>Do you agree with the figures and rationale for Growth Option 4?</i></p>
<p>The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not deliver the housing growth needed to not only support the economic aspirations of the Council but also deliver the much needed affordable housing.</p>
<p>Question 7: <i>Do you agree with the figures and rationale for Growth Option 5?</i></p>
<p>The HBF considers that Option 5 is the best growth option as it is both aspirational and employment led which links back to the Councils wish to be the 'economic and cultural growth engine of North Wales' (see Plans proposed vision) and the adopted Conwy Economic Growth Strategy. Its is also the most likely to meet the affordable housing requirement of the area.</p>
<p>Question 8: <i>Do you agree with the figures and rationale for Growth Option 6?</i></p>
<p>The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not be deliver.</p>
<p>Question 9: <i>What is your preferred growth option?</i></p>
<p>The HBF considers that Option 5 is the best growth option as it is both aspirational and employment led which links back to the Councils wish to be the 'economic and cultural growth engine of North Wales' (see Plans proposed vision). As 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</p>

within the Employment Land Review). Given that this Growth Strategy has been adopted by the Council, then the planning strategy should 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.

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

No

Question 11: What is your preferred spatial growth option?

The HBF confirm that we do not support options 1, 2, 3 or 6 do not support one particular option but instead elements of Options 4, 5 and although these are described in very different ways, comparing the plans they look very similar. Accordingly, we suggest the Council look to develop a hybrid option based on these options, which gives the greatest flexibility for growth based around sustainable settlements (Urban, Satellite Settlements and the Local Service Centres), according to their ability to accommodate development, therefore providing greater likelihood of the plan being able to deliver the identified vision, objectives and needs.

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

The HBF do not wish to suggest any other options at this stage.

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

Signature:

Mark Harris

Date

25/01/2019

Publication of your comments:

Please note that all comments received will be made available publicly and published on the Council's website:

<http://conwy.jdi-consult.net/ldp>

Link to Privacy Notice: www.conwy.gov.uk/spps/privacypolicy