



Cynllun Datblygu Lleol
Newydd 2018-2033

Replacement Local Development
Plan 2018-2033



PAPUR YMGYNGHORI 2 – ADRODDIAD SYLWADAU
CONSULTATION PAPER 2 – REPRESENTATION REPORT

Chwefror 2019

February 2019

Mae'r ddogfen hon ar gael i'w gweld a'i lawrlwytho ar wefan y Cyngor yn: www.conwy.gov.uk/cdlln Mae copïau hefyd ar gael i'w gweld yn y prif lyfrgelloedd a swyddfeydd y Cyngor a gellir eu cael gan y Gwasanaeth Polisi Cynllunio Strategol, Coed Pella, Ffordd Conwy, Bae Colwyn LL29 7AZ neu drwy ffonio (01492) 575461.

Os hoffech chi gael gair â swyddog cynllunio sy'n gweithio ar y Cynllun Datblygu Lleol ynglŷn ag unrhyw agwedd ar y ddogfen hon, cysylltwch â'r Gwasanaeth Polisi Cynllunio Strategol ar (01492) 575181 / 575445 / 575124 / 574232.

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This document contains Welsh and English representations from the public, therefore they haven't been translated..



Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Representation(s)

Nature

27378 Natural Resources Wales (Planning Consultations) [5880]

YES

Summary:

Please see full document for detailed comments on:
Foul Drainage
Flood Risk
Sites of Special Scientific Interest
Biodiversity
Protected Species
Land Contamination and Sensitive Groundwaters
Landscape

We will be happy to provide further advice and guidance in the latter stages of the SA/SEA process and look forward to working with you on the replacement LDP.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Representation(s)

Nature

27323 Dwr Cymru Welsh Water (Mr Dewi Griffiths) [6050]

YES

Summary:

We note that the Council are seeking to allocate development in accordance with a settlement hierarchy and that the level of growth to be allocated to specific settlements will be consulted on at later stages of the plan process. In order to accurately assess how growth will impact upon our infrastructure we will need to know the amount and distribution of growth. We welcome early engagement in the LDP process and we would be pleased to work with your Authority in examining the impact of the proposed options on our assets once further information is available.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 1

Representation(s)

Nature

27388 Betsi Cadwaladr University Health Board (Ms Sally Baxter) [6087]

NO

Summary:

We don't believe Option 1 would be the best option.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 1

Representation(s)

Nature

27332 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Agreed that the current LDP has not delivered the level of housing required within the plan, but it is not accepted that the settlement hierarchy itself is the reason for this.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 1

Representation(s)

Nature

27405 Cllr Anne McCaffrey [5149]

YES

Summary:

I think we should stick with the Urban and Rural Settlement classifications and general distribution levels assigned within the current LDP. Excessive development in rural areas inevitably means overdevelopment in areas where need is not identified, where access to services is not sustainable, where community services are non-existent, limited, inaccessible or lack of resilience. This only results in greenfield land being prioritised for use.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 2

Representation(s)

Nature

27333 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Agreed that the current LDP has not delivered the level of housing required within the plan, but it is not accepted that the settlement hierarchy itself is the reason for this.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 3

Representation(s)

Nature

27406 Cllr Anne McCaffrey [5149]

NO

Summary:

I am totally opposed to Dwygyfylchi being classed as a Satellite Settlement as proposed. Dwygyfylchi does not have "most infrastructure, services, facilities and potential land available". GP services have recently been diminished and centralised to Llanfairfechan. Post Office closed down several years ago. ARRIVA is reducing by 50% bus services to/from the village, as well as connectivity to Llandudno Hospital, Bangor Hospital, John Bright School, Llandudno Junction Rail Station. Ysgol Capelulo is already overcrowded and oversubscribed.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 3

Representation(s)

Nature

27334 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

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.

Response

Agreed that the current LDP has not delivered the level of housing required within the plan, but it is not accepted that the settlement hierarchy itself is the reason for this.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 3

Representation(s)

Nature

27314 Beech Developments (NW) Ltd [765]

YES

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

All of the above tends to point us towards Option 3 as the most appropriate of the identified options to be pursued, although, of course, much depends on the way in which development is subsequently distributed.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 3

Representation(s)

Nature

27358 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 4

Representation(s)

Nature

27313 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

It appears to us that Option 4 begins to get too complicated, but, in addition, we do not see why some of the settlements identified as Secondary Settlements should be distinguished from the main urban areas, of which they are functionally part or why, for example, Abergele should be 'downgraded' within the hierarchy.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 4

Representation(s)

Nature

27335 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Agreed that the WSP now has limited weight however with NDF/SDPs yet to be adopted it remains the only regional/national plan for Wales. Despite its age, some of the principles behind it still have relevance.



Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 4

Representation(s)

Nature

27407 Cllr Anne McCaffrey [5149]

YES

Summary:

I do, however, favour inclusion of a new Town Settlement and think there are a number of opportunities to do this across the County, enabling development whilst protecting communities and villages from unsustainable development.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 4

Representation(s)

Nature

27303 Helen Pittaway [6304]

YES

Summary:

I believe this best categorises the settlements between urban and rural, primary and secondary.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 5

Representation(s)

Nature

27408 Cllr Anne McCaffrey [5149]

NO

Summary:

I am totally opposed to Dwygyfylchi being classed as a Satellite Settlement as proposed. Dwygyfylchi does not have "most infrastructure, services, facilities and potential land available". GP services have recently been diminished and centralised to Llanfairfechan. Post Office closed down several years ago. ARRIVA is reducing by 50% bus services to/from the village, as well as connectivity to Llandudno Hospital, Bangor Hospital, John Bright School, Llandudno Junction Rail Station. Ysgol Capelulo is already overcrowded and oversubscribed.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 5

Representation(s)

Nature

27336 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 5

Representation(s)

Nature

27416 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Option 5 - hybrid approach.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 5

Representation(s)

Nature

27359 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

Question 1 Which Settlement Hierarchy do you consider to be the best option?

Option 5

Representation(s)

Nature

27389 Betsi Cadwaladr University Health Board (Ms Sally Baxter) [6087]

YES

Summary:

Further discussion may be beneficial to support the assessment of options however, we feel Option 5 as a hybrid of option 3 & 4 may provide the best option.

Response

Noted.



Section Option Assessment and Settlement Hierarchy

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

Representation(s)

Nature

27417 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

NO

Summary:

No

Response

Noted.

Section Option Assessment and Settlement Hierarchy

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

Representation(s)

Nature

27337 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

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

Representation(s)

Nature

27409 Cllr Anne McCaffrey [5149]

YES

Summary:

I am in favour of distributing Growth and Settlement across the County. Lack of investment and development within our non coastal rural areas particularly renders them unsustainable for the future and also imposes disproportionate pressures on the Council and those communities whose need and demand for services exist and need to be met. Jobs distribution and economic development need to correlate directly with housing distribution, facilitation Prosperity for All, a Welsh Government objective. Existing communities, where there is inadequate connectivity and access to services, facilities and required infrastructure must not be overburdened with inappropriate development.

Response

Noted.

Section Option Assessment and Settlement Hierarchy

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

Representation(s)

Nature

27390 Betsi Cadwaladr University Health Board (Ms Sally Baxter) [6087]

YES

Summary:

The location of Primary and Community services could be an additional consideration eg GP, Community pharmacy. The land use plans could be vital to considering the estate for community facilities in its broadest sense.

Response

Agreed, the LPA are keen to use the RLDP to support provision of healthcare facilities e.g. through site allocation where appropriate, subject to justification and evidence to demonstrate need.



Representation(s)

Nature

27360 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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.

Response

Noted.

Representation(s)

Nature

27338 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27418 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted

Representation(s)

Nature

27339 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27419 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted

Representation(s)

Nature

27361 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

This growth option scores positively in the majority of sustainability appraisal objectives. This growth option is likely to support improved health and wellbeing outcomes through facilitating growth of the working age population and the provision of associated economic opportunities.

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 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.

Response

Noted.

Representation(s)

Nature

27340 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27420 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted.

Representation(s)

Nature

27362 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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 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.

Depending on the extent greenfield land is used, the levels of growth could result in adverse effects on ecological, geodiversity and soil interests.

Response

Noted.

Representation(s)

Nature

27341 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27421 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted.

Representation(s)

Nature

27364 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27422 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted.

Representation(s)

Nature

27342 Home Builders Federation Ltd (Mr Mark Harris) [6080]

YES

Summary:

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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27365 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

No longer being considered by the Council

Response

Noted.

Representation(s)

Nature

27343 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not agree with the figure and consider that it would result in a housing requirement figure that would not be deliverable.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

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

Representation(s)

Nature

27423 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Yes

Response

Noted.

Question 9 *What is your preferred growth option as detailed in the options above?*

Representation(s)

Nature

27324 Dwr Cymru Welsh Water (Mr Dewi Griffiths) [6050]

YES

Summary:

Welsh Water has no real preferred growth option from those under consideration. We look to the adopted Local Plan to guide us where future investment in our infrastructure may be required and we aim to ensure that sufficient capacity exists to accommodate domestic development, however if a lack of capacity is identified we look to address this through capital investment in our Asset Management Plans (AMP). To support this investment planning we require some certainty in terms of growth areas and site allocations

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 3

Representation(s)

Nature

27367 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

Option 3 may also contain reasonable growth assumptions given that it uses some of the same methodology and assumptions as used in WG projections. 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 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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27315 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

We have not seen a proper justification for Option 4 which is said to be based on the results of the Employment Land Review in pointing towards a requirement for between 12.6 and 14.3 ha of additional employment land. However, the Employment Land Review appears to assess demand as ranging between 12 and 21 ha of additional employment land being required and, therefore, it is clear that Option 4 scenario is very much at the bottom end of the identified range and appears to offer little to address the fundamental problems with the economy that have been identified.

Response

Noted. 12-14ha of Employment land is a growth scenario predicted in the Conwy Employment Land Review based on economic forecasts (which suggest growth will be flat over the next 15 years,) balanced against the positive impact regional projects will have on numbers of jobs in Conwy.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27424 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

YES

Summary:

Option 4 - employment led growth for 1,850 jobs by 2033 (which would need 5,250 homes) approx. 1,050 of which are affordable.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27391 Betsi Cadwaladr University Health Board (Ms Sally Baxter) [6087]

YES

Summary:

Suggest Option 4 is the preferred spatial growth option.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27366 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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 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. 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.

Response

Noted.

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27306 Helen Pittaway [6304]

YES

Summary:

House building needs to be driven by employment opportunities as our young people to should be encouraged to stay in the area instead of being forced away in order to find work. If jobs are not a major consideration, the homes built risk being used for holiday homes which detrimentally impact communities.

Response

Noted.

Section *Growth Options (Levels of Growth 2018 - 2033)*

Question 9 What is your preferred growth option as detailed in the options above?

Option 5

Representation(s)

Nature

27316 Beech Developments (NW) Ltd [765]

YES

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Option 5 is based on 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. Given that this Growth Strategy has been adopted by the Council, it would seem illogical that the LDP might not then look to put in place a planning strategy that would support the achievement of its goals.

For the above reasons we consider that Option 5 is the Option that should be pursued.

27344 Home Builders Federation Ltd (Mr Mark Harris) [6080]

YES

Summary:

We consider 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'. 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). Given that this Growth Strategy has been adopted by the Council, then the planning strategy should support the achievement of its goals.

Response

Noted - Since publication of the Economic Growth Strategy, as part of its LDP evidence base and in line with PPW, the Council commissioned an Employment Land Review (ELR.) The ELR looks at a range of growth scenarios based on past take up rates, economic growth forecasting, population projections, relevant strategies and significant regional projects. After reviewing these scenarios, the preferred approach is the scenario which combines economic forecasts with significant regional projects. This scenario allows for upto 14ha of additional employment land (including an allowance for contingency which is based on past take-up rates.)

Section Growth Options (Levels of Growth 2018 - 2033)

Question 9 What is your preferred growth option as detailed in the options above?

Option 5

Representation(s)

Nature

27410 Cllr Anne McCaffrey [5149]

YES

Summary:

I think we need to take cognisance of the potential demise of the Wylfa Newydd Project within the lifespan of the RLDP. Without doubt, this impacts on the need for housing and the jobs growth projections.

I do think we need to align the RLDP with our Regional Growth Plan. But I do think we need to be prepared to take a realistic and measured approach and resist being directed by WG or PINS to adopt unsustainable and undeliverable levels of growth.

Response

Accepted in principle. The impact of Wylfa on the LDP jobs growth figures has since been removed.



Section Growth Options (Levels of Growth 2018 - 2033)

Question 10 Are there any other options we should include?

Representation(s)

Nature

27425 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

NO

Summary:

No

27345 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

None.

27392 Betsi Cadwaladr University Health Board (Ms Sally Baxter) [6087]

NO

Summary:

We are not aware of any other options to include.

Response

Noted.

Question 10 Are there any other options we should include?

Representation(s)

Nature

27368 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

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.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Representation(s)

Nature

27426 Bay of Colwyn Town Council (Mrs Tina Earley) [5871]

NO

Summary:

No overall preference.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Representation(s)

Nature

27307 Mr and Mrs David Gee [103]

YES

Summary:

I am making this representation on behalf of the joint owners of the plot of land, of about 2 acres, situated between Hawes Drive and Maes y Castell in Deganwy. The nearest postcode is LL32 9BW.

We consider that, whichever of the nine Strategic Options is selected, some, if not all, of this plot of land is suitable for residential development.

Response

Noted. Assessment of non strategic sites for inclusion in the RLDP will take place following publication of the Preferred Strategy, during the compilation of the Deposit Plan.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Representation(s)

Nature

27325 Dwr Cymru Welsh Water (Mr Dewi Griffiths) [6050]

YES

Summary:

We are pleased that the document recognises the importance of ensuring that new development areas can be served, or are capable of being served, by appropriate infrastructure. We will need to know the level of growth in each settlement and the specific location of proposed allocations in order to accurately assess the capability of our existing water and sewerage networks, and Wastewater Treatment Works (WwTW), to accommodate development.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 1

Representation(s)

Nature

27317 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Given our comments in relation to the logic of updating the settlement hierarchy, we do not support Option One that would merely repeat the distribution within the current LDP, although we acknowledge that the main settlements should continue to be the main focus for development.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 1

Representation(s)

Nature

27346 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 1

Representation(s)

Nature

27370 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

This 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.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 2

Representation(s)

Nature

27318 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Nor do we support Options 2, 3 and 5 which in their different ways seek to direct all development either to the A55 corridor, to key settlements alone, or to hubs and corridors, there is always a need for balance with the greatest level of growth directed to the most sustainable locations, but an overall sustainable approach must also consider housing needs within the smaller settlements so as to maintain and even improve their viability/vitality in the future.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 2

Representation(s)

Nature

27371 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

The key weakness of Option 2 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.

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 2

Representation(s)

Nature

27347 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Agreed that flexibility is key to support the delivery of the RLDP objectives. In terms of housing, this will be through a combination of the hierarchy and housing policies.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 2

Representation(s)

Nature

27305 Helen Pittaway [6304]

YES

Summary:

Using existing large settlements along the coast makes the best use of transport links and infrastructure, that would be attractive to homebuyers and employers alike.

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 3

Representation(s)

Nature

27319 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Nor do we support Options 2, 3 and 5 which in their different ways seek to direct all development either to the A55 corridor, to key settlements alone, or to hubs and corridors, there is always a need for balance with the greatest level of growth directed to the most sustainable locations, but an overall sustainable approach must also consider housing needs within the smaller settlements so as to maintain and even improve their viability/vitality in the future.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 3

Representation(s)

Nature

27372 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

Option 3 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.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 3

Representation(s)

Nature

27348 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Agree that there is a need to give more flexibility to growth in some of the more sustainable locations and further consideration will be given to the hierarchy for inclusion in the PS.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27349 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27322 Beech Developments (NW) Ltd [765]

YES

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Option 4 is the most balanced approach, but with the important caveat that local needs should not be forgotten or under-estimated. We note that it is commented that that this Option is more directed towards settlement hierarchy options 4 and 5, which we have not supported, but we see it more as an outline of a general approach to housing distribution and, particularly, as it is noted that the final approach may be a combination of more than one option (page 56), we see no difficulty in identifying it as our preference in terms of the options identified.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 4

Representation(s)

Nature

27369 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

YES

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

This will direct development in line with the WSP 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. Likely to have less impact on the capacity of infrastructure and on a wide range of physical and environmental constraints.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 5

Representation(s)

Nature

27320 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Nor do we support Options 2, 3 and 5 which in their different ways seek to direct all development either to the A55 corridor, to key settlements alone, or to hubs and corridors, there is always a need for balance with the greatest level of growth directed to the most sustainable locations, but an overall sustainable approach must also consider housing needs within the smaller settlements so as to maintain and even improve their viability/vitality in the future.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 5

Representation(s)

Nature

27350 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Accepted in principle. A growth distribution similar to what has been suggested is planned for the Preferred Strategy and will be subject to further consultation.

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Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 5

Representation(s)

Nature

27373 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

Scores positively in the majority of sustainability appraisal objectives and would be suited to all of the settlement hierarchy options. However focusing growth on transport hubs and corridors would have mixed results. Growth would be focused within the sustainable locations, 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.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 6

Representation(s)

Nature

27321 Beech Developments (NW) Ltd [765]

NO

Agent: The Planning Consultancy (Mr Matt Gilbert) [764]

Summary:

Whilst we acknowledge that Option 6 relating to a new or expanded settlement could have a role, we believe, in accordance with PPW, that such an approach should only be contemplated when other options have been fully investigated in order to meet the level of identified need (the experience of Denbighshire in seeking to deliver major development at Bodelwyddan should be a lesson to all as to the potential complexity of such an approach).

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 6

Representation(s)

Nature

27351 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

The HBF do not support options 1, 2, 3 or 6 and 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.

Response

Noted.



Section The Spatial Distribution Options for Growth

Question 11 What is your preferred spatial growth option as detailed in the options above?

Option 6

Representation(s)

Nature

27374 FCC Environmental (UK) Limited (Mr Matthew Hayes) [6286]

NO

Agent: Axis (Mr Martin Pollard) [6306]

Summary:

Does not score positively within any of the sustainability appraisal objectives. It would be inflexible to changes in circumstance and have limited mechanisms to promote brownfield land. The Council has a severe shortfall in its 5 year housing supply, and the allocation of a new settlement of 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.

Response

Noted.

Section The Spatial Distribution Options for Growth

Question 12 Are there any other options we should include?

Representation(s)

Nature

27352 Home Builders Federation Ltd (Mr Mark Harris) [6080]

NO

Summary:

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

Response

Noted.
