

Strategic Site Engagement in Conwy County Borough by Planning Aid Wales: Old Colwyn Report

1. Background

Planning Aid Wales (PAW) was commissioned by Conwy County Borough Council (Conwy CBC) in September 2023 to provide non-statutory community engagement activities on 5 Strategic Sites in the emerging Conwy Replacement Local Development Plan. This report provides a summary of activities undertaken with respect to the Old Colwyn Strategic Site. It summarises the feedback received from local communities who participated in the facilitated events for the site delivered by PAW. This report and all additional comments received by email will be forwarded to Conwy CBC who intend to use the information collected to inform the Deposit Stage of the plan.

As an organisation that supports community engagement in the planning process, PAW only undertakes commissions that:

- Align with its mission for a fairer, more transparent and more responsive planning system.
- It believes can add value to a planning consultation / engagement process and will allow more people to have a more meaningful say in that process.

As well as meeting these priorities, PAW particularly welcomes this engagement activity. Whilst there are lessons learned that can be applied to future activities, it goes above and beyond what Local Planning Authorities are required to do in planning regulations - the entire exercise is being delivered in addition to 'statutory' consultations that have and will take place on the Replacement Local Development Plan.

2. Scope & Methodology

This engagement work was intended to explore the views of community representatives on how the sites could be developed in future. The information gathered can be used to inform site-specific policies / Place Plans / Site Briefs / Masterplans (or even planning applications) and will inform the production of the Deposit Replacement Local Development in 2024. The original project scope included the provision of one face-to-face and one online event per site (a total of 10 events) between October and December 2023. Venue availability meant that facilitating all of the events during this period and allowing time for advertising was not possible, and as such it was agreed that some events would be extended into January 2024 and additional events would be provided subject to demand.

The project has attracted substantial feedback on the publicity of the events both from members of the public and their elected representatives. PAW has made every effort to adjust the nature of the activities accordingly and unfortunately, use of existing Local Development Plan contact lists were not possible due to Data Protection reasons. As a result of the above, PAW has undertaken additional works outside of the scope of the original proposal, including preparation and postage of letters to residents close to the site (see section 3, below) and the provision of two additional face-to-face events to meet booking demand.

Both the online and face-to-face events followed broadly the same format. PAW delivered a presentation and then facilitated audience discussion around a set of broad, overlapping topics. The presentation included information on:

- PAW's role and the nature of the events.
- A brief overview of the Local Development Plan (LDP) preparation process, land allocations, candidate sites and how LDPs influence planning application decisions.
- A recap of activities already taken place on the Conwy Replacement Local Development Plan to date (including the Preferred Strategy consultation in 2019) and the anticipated forthcoming Deposit Plan Consultation in 2024.
- A definition of Strategic Sites, how they are assessed and selected.
- The current authority-wide targets (4,300 homes including 700/20% contingency and 1,500 jobs on 16.4ha employment land).
- A review of the intended site allocation in the 2019 Preferred Strategy and a comparison with the current proposal.
- Details of the current proposal as follows:

- A reduction in the anticipated number of homes from 450 to 200-300 new homes, to including affordable housing, as part of staged development.
- Improved local road network and active travel.
- Public open space.
- Land safeguarded adjacent to Ysgol Swn Y Don for expansion.
- GP space provided within existing surgery in short term subject to mitigation / further discussions to take place with surgery and Health Board.
- Identification that the existing adjacent allocation for Ty Mawr will likely continue at ~237 homes.

PAW addressed procedural questions wherever possible and asked follow-up questions to explore matters further where appropriate, but it was also emphasised that any feedback (including questions) gathered would be presented back to Conwy CBC word-for-word.

For the online event, the entire session was recorded and feedback from participants was transcribed. For the face-to-face session, participants were provided with physical copies of the site map and discussion prompt sheets and were invited to record their feedback either directly on the sheets or on sticky notes.

Four broad discussion topics were facilitated as follows:

1. **First Impressions**, where initial comments, issues and questions on any topic were invited.
2. **Local Knowledge**, where participants were invited to describe the character of the existing site and its surroundings and share their views on the proposal and impacts in the context of this knowledge.
3. **Site Design**, where participants were invited to consider design implications in relation to access / highways, movement across the site, Active Travel, the form and nature of open space, environmental matters, safety and any potential improvements that would make the allocation better.
4. **Community priorities**, where participants were invited to consider community wants / needs, gaps in provision or any improvements or benefits the site might bring.

A summary of all of the feedback gathered as part of the exercise is presented in part 4, below. Appendix A presents the full feedback as provided at both events. It was also emphasised that further comments could be provided in writing by 31st January 2024, and all communications received have been forwarded to Conwy CBC alongside this report. A summary of the additional comments received is provided in Appendix B (NOTE: full comments have not been published in this report for Data Protection reasons).

3. Advertising, bookings and feedback on publicity

With the support of the Strategic Planning Policy Service at Conwy CBC, PAW prepared multi-channel advertising that included:

- Email notices were issued to local representatives according to research across 9 categories (Elected Members, Town and Community Councils, adjoining councils, local services, third sector organisations, local groups, local business representatives and businesses and ‘others’ such as local media and hard-to-reach groups). In such instances, PAW was reliant on information publicly available or could be found via internet search.
- Social media posts were issued via CCBCs social media channels.
- Press releases were issued to the local press via CCBCs press team.
- Details were shared on the CCBC website.
- Posters were distributed to appropriate venues e.g. town council halls, churches and shops close to each site.
- Letter mailouts were issued to properties adjoining or adjacent to the sites in question.

Each email notice invited participants to share the invites with their local networks. In some instances, this attracted substantial social media and press attention.

Each notice included a link to an event booking form on the Eventbrite platform which was used for PAW to plan around event numbers.

A total of 88 emails¹ and 394 letters were sent. A summary of the advertising issued by PAW, the bookings generated and the resultant participation for the Old Colwyn site is provided below:

| Event | Bookings | Attended |
|---|-----------------|------------|
| Old Colwyn – Online, 12 th Dec. | 20 | 14 |
| Old Colwyn – Festival Church, 10 th Jan. | 50 ¹ | 29 |
| Old Colwyn – Stadiwm CSM (x2), 22 nd Jan | 105 | 62 |
| Total: | 175 | 105 |

¹ Participants invited to attend 22nd Jan event(s) after bookings reached venue limit of 80 and a waiting list of 13. This was for health and safety reasons.

¹ Indicates the number of unique email addresses researched for local groups that were publicly available via Google Search. Addresses may have been contacted independently by PAW and Conwy CBC.

Feedback on publicity

Adjustments were made to publicising activities wherever possible as the activities progressed and according to the feedback received from local members and members of the public. This included undertaking postal advertising, which was not originally part of the project scope.

In the case of the Old Colwyn site, letters were sent to 394 properties nearest the site using addresses established using Conwy CBC online maps, as indicated in the following map:



It should be noted that unlike a public survey, where the widest possible population is invited to attract a breadth of views, these events were designed to explore and discuss the depth of opinion of the views of community representatives local to the sites. Nonetheless, concerns were raised during the project that:

- The events were not advertised widely enough and did not reach enough people in time. This was partly limited by the timeframes established to complete the project and partly by the limited contacts that could be supplied to PAW and the tenant's concerns were addressed by Conwy CBC directly. All events were advertised to local elected Members, Old Colwyn Town Council, via Conwy's social media channels, via press releases and via local advertising and letter.

- The information provided about the events was insufficient and triggered multiple requests for more information from Conwy CBC and PAW. Whilst every effort was made to be clear about the nature of the events in the initial advertising, many concerns were raised about the lack of information about the proposals on the sites themselves. Whilst it has been emphasised at every opportunity that there is limited information available about the sites at this stage of the Replacement LDP process and the aim of the exercise is to inform the subsequent statutory consultation on the Deposit Plan, these concerns persisted. PAW prepared a 10-page FAQ document about the exercise and distributed event slides after the first event had been delivered on each site as a result.

Based on the above, Planning Aid Wales would make the following recommendations for improving publicity in future:

1. Establish and publicise the scope and limitations of publicity activities at the outset, placing even greater emphasis on inviting community representatives to help 'spread the word'.
2. Allow a minimum 8-week lead-in time for advertising of each event.
3. Ensure a web page is established with all available background information, links to previous exercises and details of how to book into events before advertising is begun.
4. Consider larger / more flexible venues, taking into account proximity to the sites in question.
5. Ensuring the LDP consultation register is available / publicity can take place via the register.
6. Several participants in Old Colwyn suggested that young people in the area should be engaged in the process.

4. Summary of feedback on the Old Colwyn Site

105 participants attended the events and a further 17 individuals forwarded comments by email. In total, the Old Colwyn exercise has been able to generate in excess of 630 individual comments on a wide range of matters that were primarily issues of concern and local knowledge, although there were some, albeit far fewer comments on site design and community priorities.

It was PAW's impression that the vast majority participants who attended events would likely object to the site were the exercise a formal consultation, and in fact, most of the subsequent Emails received identified that they were outright objections. Some participants did express support for some form housing in principle but also expressed concerns about the justification of need at this site, the scale of the proposal and the potential associated impacts.

Whilst the sessions were divided into four broad discussion topics, each topic overlapped with the next, and for ease, the following summary takes into account feedback from all events and discussion topics and has been divided into i). Issues of concern and ii). Mitigations and improvements.

i). Issues of concern to the community

The following points have been ranked by the number of times referenced by different individuals across all events and additional comments received by email.

NOTE: This is not an exhaustive list of all issues raised – see appendices A and B for notes of all feedback generated.

The most common areas of concern, in order of frequency raised (highest first) included:

1. The allocation will have a negative impact on highway safety.

A total of 78 comments were raised relating to traffic, access, highway safety and public transport matters across all activities (See appendices A and B for more detail). These can be broadly categorised into the following themes:

1. Existing road networks and access lanes that will connect with the site are already suffer heavy congestion at peak times and cannot cope with the estimated 1,000 additional cars that the site will bring (Coed Coch Road, Llanellian Road and The Marine Roundabout referenced multiple times). The additional traffic will cause increased pollution and will be unsafe.

2. Drivers will try to avoid the above and use lanes such as Peulwys Lane which is narrow, partially unadopted, winding, has no pavements and few passing bays, causing access and safety concerns for drivers, pedestrians and emergency services.
3. The new residents will need to commute for work and the distance of the site from the town centre and amenities will mean that car use will be necessary. The site is not served by public transport (and should be) and the steepness of the site will make it unsuitable for active travel for many.
4. The regeneration proposals for the Marine Roundabout will be negatively affected by the site(s), as will other traffic management measures such as the 20mph speed limit and speed bumps.
5. The existing traffic assessment was conducted during 2020 lockdowns, it does not reflect actual traffic movement and is not impartial as it was prepared by the developer. New independent traffic assessments should be undertaken. Some suggested a one-way system would be necessary.

2. The allocation is inappropriate / unnecessary.

76 comments were raised relating to the need for the housing (particularly at this scale), it will result in the loss of the identity and character of Old Colwyn and will not address the needs of local residents. The main themes identified included:

1. The need for housing at the site has not been justified, goes against national and local planning policy and would result in the loss of working agricultural land and the irreversible change to the character and identity of Old Colwyn as a village. The site(s) would become 'New Colwyn', would not be able to integrate with the community and would represent unjustifiable urban sprawl. The site itself has a wide range of geological, topological and other constraints (identified under other sections below) and no evidence has been presented to justify its suitability.
2. The site does not meet the needs of the population. 2021 Census data showed that the population of Old Colwyn had decreased by 0.2% in the preceding 10 years, and the proposal would result in an unjustifiable increase of the population by 14%. The proportion of 65-year-olds had increased by 11% in the same period and the site is too far from the town centre, too steep and not served by public transport, making it unsuitable.

3. New housing has been disproportionately focused in Old Colwyn and previous plans and developments have failed to improve local infrastructure and services.

3. The allocation will negatively impact already struggling local services

61 comments raised concerns about there being insufficient capacity in local education, health and other services to meet current demand, let alone the additional housing being proposed. The main themes identified included:

1. Insufficient capacity of local health services. Primarily the existing pressure on Cadwgan GP surgery, long delays for appointments and an inability to recruit new GPs means the additional housing would negatively affect it. Other health services including dentistry, hospital, cancer care and community nursing was also referenced. Concerns were raised over reported figures used by Betsi Cadwaladr Health Trust to determine capacity (1.2 people / house) were insufficient and whether the Trust had confirmed they could cope with additional housing.
2. Impact on schools. Multiple concerns were also raised about school capacity and existing budgetary challenges they are facing, in spite of reported capacity and mitigations for Ysgol Swn y Don. Some felt the demand could not be met by an existing school, even if extended, and that there would be no additional capacity at Welsh speaking schools.
3. A wide range of other services were referenced with the same capacity issues, including emergency services, policing and local infrastructure (roads, water supply, drainage, electricity etc).

4. Local flooding is increasing and water infrastructure cannot cope

59 comments were raised in relation to flooding, surface-run-off, drain and sewer capacity and water supply. The main themes identified included:

1. Incidences of flooding surrounding the site are increasing (some attributed this to climate change) and existing drains and sewers are already unable to cope. Multiple examples of fields and local roads and lanes flooding were given for Coed Coch Road, Peulwys Lane and Peulwys Estate with photographs being supplied with written comments. Some noted the situation had worsened as a result of recently completed housing developments and others highlighted the geology of the site (boulder clay) and topography of the site (a steep hill) makes matters worse. Many stated the new housing will create additional surface runoff and very few felt the issue could be managed by Sustainable Urban Drainage Systems on the site. Some suggested

existing infrastructure needed to be upgraded and others asked for more detailed objective reports on the matter to be prepared.

2. Concerns were also raised over foul sewer capacity and that current infrastructure would be unable to cope with such a large increase in housing. Some asked for upgrades to the existing system and that separate systems were needed for any new housing.
3. Some concerns were also raised about water supply being insufficient for existing residents, let alone the new properties.

4. Alternative, brownfield sites should be prioritised

33 comments suggested that Conwy CBC should prioritise brownfield sites over the green field allocations proposed. Many comments suggested the total housing figures should be better distributed throughout the authority in infill and brownfield sites rather than concentrated in Old Conwy. Colwyn Bay in particular was suggested as an alternative, where empty shops and other buildings should be prioritised to simultaneously regenerate the town and help meet active travel objectives.

5. The allocation will destroy local habitats

33 comments raised concerns about the loss of the land as detrimental to local ecosystem, resulting in the loss of important (and in some cases protected) Flora and Fauna. A wide range of species were referenced including Orchids, bats, birds (including birds of prey), butterflies and badgers. As well as the loss of habitat, concerns were raised over the loss of hedgerows as feeding grounds and the entire site as a breeding ground. Several calls were made for a full ecological study to be prepared.

6. Housing proposed will not meet local needs or be affordable

30 comments considered that the housing that would be provided would be large market housing that would not meet local needs and would be unaffordable by local people, in particular young people. Whilst there was some consensus that affordable housing is needed, there was a general sense of distrust that even if Conwy CBC required it, developers would renege on these agreements. Some felt that Housing Associations should be supported to provide housing (on other, smaller sites), whilst others suggested at the least, the number of units on the allocation should be reduced.

7. This and other engagement exercises have been inadequate

30 comments were received highlighting that this and past exercises did not reach enough people, that the strength of community feeling is stronger and wider-reaching than the exercise captured (e.g. a petition of 652 signatures), and community views have been and will be ignored. Many felt that each resident in Old Colwyn should be notified, Conwy Officers should have attended events to answer questions and feedback has not been provided on the Preferred Strategy. Others expressed concern that elected members are being prevented from representing community views by planning procedures.

8. Other areas of concern

1. 19 comments were made regarding the loss of existing uses; Peulwys Farm as the oldest remaining farm in the area, the loss of green amenity space and the impact on public footpaths.
2. 17 comments identified concern over the direct impact on neighbouring properties and the traffic, noise and dust impacts of construction on the site which would likely last many years.
3. 9 comments identified the site is completely unsuitable for active travel due to its steepness.
4. 6 comments raised concerns about the impact of the proposal on the Welsh Language and such a large population increase would dilute the use of the language in Old Colwyn further.

ii). Mitigations and Improvements

Whilst the majority participants felt the allocation was inappropriate (with many objecting outright), some were willing to participate in discussions and put forward some suggestions relating to mitigations against impacts, site design and priorities for the community should the site go ahead. However, even in the context of these discussions, many felt the concerns identified in part i) should be addressed fully and full justifications should be provided in the upcoming Deposit Plan regarding all matters raised.

The most common suggestions in these discussions, in order of frequency raised (highest first) included:

1. Address access / transport / highway safety matters. 34 comments related to addressing traffic and transport matters identified. Many of these reiterated concerns, but some made the following suggestions:

1. Prepare an up to date, objective and impartial traffic assessment and an appropriate traffic management plan. This should include traffic pollution studies and the principle of studies should be extended to all key concerns raised.
2. Ensure access for emergency services and safe routes for education transport is considered above.
3. Provide more bus / public transport services (some noted that this was not in planning's gift).
4. Extend and ensure speed restrictions are enforced.
5. Consider the impact on public footpaths.
6. Avoid installation of traffic lights on Marine Roundabout.
7. Consider reducing current speed limit on Peulwys Lane beyond Meadowbank.
8. Ensure access through the site is provided for construction traffic before development begins to limit disruption.
9. Avoid opening access through the Gwynant estate.
10. Ensure any highway improvements accommodate traffic volumes and offer maximum visibility.

2. Address local service / infrastructure concerns. 25 comments reiterated concerns over impact on local infrastructure comments related to addressing traffic and transport matters identified above, but some made the following suggestions:

1. Prioritise delivery of infrastructure (roads, services) before housing is developed.
2. Ensure any provisions made in policy (section 106, affordable housing, open space etc.) are actually enforced and delivered and are not diluted by viability arguments.
3. Ensure funding for schools and health services can be sustained beyond initial set-up costs, e.g. guaranteed Doctor capacity.
4. Ensure sufficient drainage infrastructure capacity is provided (including treatment plants) for existing and new properties.
5. Consider providing amenities that can be shared with existing residents and avoid creating a pure housing estate (shops, community centres, open spaces, play spaces etc).
6. Consider District heating system to reduce energy impacts.

3. Address appropriateness and affordability concerns. 22 comments made the following suggestions:

1. Reduce the scale of development and the number of units or reconsider alternative (brownfield sites).
2. Provide more social / affordable housing (preferably on brownfield sites).
3. Ensure affordability is well defined, justifiable and appropriate in the context of the local area.
4. Address local needs in housing mix – ensure that bungalows and 1-2 bed properties are provided (ideally in other locations) and ensure local young people are able to stay in the area.
5. Ensure affordable housing / social housing is not undermined by viability arguments.
6. Reduce tax-payer burden for current homelessness crisis.

4. Nature and environmental protection. 15 comments reiterated concerns over the loss of local habitats, but some suggestions included:

1. Ensuring full ecological and environmental impact assessments are undertaken and any matters identified are appropriately mitigated against.
2. Ensure the Site of Special Scientific Interest near Ty Mawr is not affected.
3. Consider establishing Tree Protection Orders for trees on site.

1. Site / Building Design. 10 comments raised the following suggestions:

1. Consider energy efficient design to reduce carbon impacts; ensure houses are oriented correctly and ensure energy infrastructure is considered.
2. The site is subject to high winds and this should be taken into account in design.
3. Public open space should include green fields, places to walk, not just for children but for people of all ages
4. Safety matters like emergency access during construction should be planned for.
5. Avoid 3-storey properties with cramped parking
6. Ensure site is designed for people at different stages of life.
7. Create a park / public space on the Southern path of Ty Mawr / Merion Bach. The current footpath is overgrown, underused and could be better.

5. Other suggestions. 9 comments made the following suggestions:

1. Several identified that Section 106 monies should be enforced, used what they are intended for and should prioritise benefit the local community only. One suggested that improving energy efficiency of existing housing stock.
2. Ensuring the properties are freehold rather than leasehold.
3. Provide facilities that will benefit existing and new residents – youth club, meeting places for all ages and open spaces – social infrastructure not just housing.

6. Active travel. 7 comments raised regarding active travel unanimously identified the steep nature of the site would make it unsuitable for cyclists and all but the fittest pedestrians. Retention, maintenance and improvement of existing footpaths were identified as priorities by some.

5. Conclusions and Recommendations

Of the 105 residents of Old Colwyn who participated in this exercise, it is clear that the majority opposed the principle of the proposed allocation and expressed a wide range of concerns on impact of the scheme on traffic, local services, flooding and other matters.

It is recognised that the participants represent 1.29% of the total population of Old Colwyn and in that regard, the results of the exercise cannot be taken as either statistically significant or a representation of the views of those who did not participate. However, given the frequency and commonality of the issues raised independently at events, it is possible similar issues may be reflected in a wider engagement exercise.

The issues identified by the community within this report (both in the body of the report and the appendices) are submitted to Conwy CBC for consideration as they prepare the Deposit Plan; at the least, PAW recommends that all of the issues raised are addressed, justified and clarified in the Deposit Plan consultation, and ideally a response is prepared to the issues raised and circulated back to those who participated and published on their website. In terms of the forthcoming consultation, PAW also suggests that the recommendations in section 3 are taken into account when planning and publicising the Deposit Plan consultation exercise.