



# Replacement Local Development Plan 2018-2033

## Background Paper

July 2019

**BP 42: Welsh Language Impact Assessment  
of Allocated Sites**

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# Welsh language impact assessment of allocated sites in Conwy's Preferred Strategy 2018-33

High level summary of conclusions for Welsh language impact  
assessment approach for the five allocated sites

July 2019



# Summary of conclusions of WLIA on five sites

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# Summary of conclusions of WLIA on five sites

## High level summary of conclusions for Welsh language impact assessment approach for the five allocated sites

### Introduction

Conwy County Borough Council (Conwy) is developing a Replacement Local Development Plan for the period 2018-33. As part of the Strategy Appraisal, the County Borough is required to carry out a Welsh language impact assessment on its proposals. Therefore, prior to publishing the Preferred Strategy in July 2019, RHD Consultancy Ltd was commissioned to carry out an analysis of the changes in legislation and policy since the last LDP, to review the Welsh language planning policy for Conwy Council and to complete a high-level Welsh language impact assessment on the Preferred Strategy.

A high-level Welsh language impact assessment has been prepared for the Preferred Strategy and will be published in July 2019.

This paper provides a high-level summary of the above, outlining the five sites that have been proposed in the Preferred Strategy as well as presenting the high-level conclusions on the individual Welsh language impact assessments required as next steps.

### Strategic Sites

Strategic Policy 11 within Strategic Objective 1 of Conwy's Preferred Strategy (2019) lists the strategic sites allocated within the plan for development – housing, commercial and mixed use.

Please see the table below for a summary of the 5 strategic sites:

#### **Strategic Policy 11 (SP/11): Strategic Sites**

To partly meet the future growth requirements, reflect highly constrained land to the east of the County Borough and contribute positively to the North Wales Growth Deal, five Key Strategic Sites\* are proposed in sustainable and accessible locations, supported by the required infrastructure and proposed phasing over the Plan Period:

Coastal Development Strategy Area (CDSA):

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1. Llanfairfechan – Mixed Use Housing (400 Homes), Affordable Housing, Primary School, Allotments and Recreational Space. The site is phased between 2021 and 2029
2. Llanrhos – Mixed Use Housing (250 Homes), Affordable Housing, Primary School, 1 Hectare of B1 Employment Land, Allotments and Recreational Space. The site is phased between 2024 and 2031.
3. Old Colwyn – Housing (450 Homes), Affordable Housing, Allotments and Recreational Space. The site is phased between 2024 and 2033.
4. Abergele – Mixed Use Employment (4.7 Hectares of B1, B2 & B8), Retail, Recreational Space and a Primary School. The site is phased between 2021 and 2027.

### Rural Development Strategy Area (RDSA)

5. Llanrwst Key Service Centre - Housing (200 Homes), Affordable Housing, Allotments and Recreational Space. The site is phased between 2021 and 2026.

\*All Key Strategic Sites are supported by a Viability Assessment, Site Assessments and Concept Drawings. All Strategic Sites will be supported by a Placemaking Vision, Design Principles and Development Briefs.

## Welsh language high level assessment by site

Each of the five sites have been analysed in turn to determine the need for a fuller impact assessment. In coming to our conclusions, we drew on a number of national policy, legislation and other documentary evidence, such as: Planning Policy Wales, TAN 20 (2017), Planning and the Welsh language: the way ahead (2005), Conwy's Welsh language planning policy, the Well-being of Future Generations Act 2015, Welsh Language (Wales) Measure 2011, Cymraeg 2050, ONS Census 2011 data, Conwy's Welsh Language Standards, and Conwy's Welsh language strategy.

## Coastal Development Strategy Area: West

A new mixed-use Strategic Site is proposed in Llanfairfechan consisting of 400 new homes, affordable housing, new primary school, allotments and recreational space. The frontloading approach has determined that there is capacity in the water supply and sewerage/drainage infrastructure and Doctor's Surgery. However, active travel routes and safer routes to school options require improvement from the wider residential areas within Llanfairfechan. A new Band-B Primary School is also planned between 2020 and 2024. The impact of the growth level has been considered and reflected in the appropriate size of school.

## Summary of conclusions of WLIA on five sites

This strategic area lies at the western extremity of the RLDP Plan Area, physically separated from the Creuddyn area by the Penmaenbach headland and is bounded to the south by the Snowdonia National Park. Llanfairfechan and Penmaenmawr are the two urban settlements within this strategy area and are generally self-contained with a good level of facilities and services.

Both Llanfairfechan and Penmaenmawr are linguistic sensitive areas in Conwy with, 46.7% and 33.8% of the population able to speak Welsh, respectively – which is above the national population of 19%. This area also neighbours Snowdonia national park where high percentages of the population are Welsh speaking.

To reflect the population levels, services and facilities, good accessibility and the impacts related to the adjusted growth distribution from the East, 10% of housing growth (market and affordable) will be located within the Western Strategic Area, including completions, permissions, windfall and new allocations. As a result of topography and land availability in Penmaenmawr, the majority of new homes will be located within Llanfairfechan, which has excellent accessibility to the strategic rail and road network and the wider higher order urban settlements.

The school in Llanfairfechan has capacity issues currently and a new Band B school is planned between 2019 and 2024. The Welsh in Education Strategic Plan also commits to increasing the Welsh medium provision and categories of schools – to more Welsh medium/ bilingual provision.

To ensure growth and new housing is deliverable a new mixed-use strategic site is proposed in Llanfairfechan consisting of 400 new homes, affordable housing, new primary school and recreational space. Improvements to the pedestrianisation from the wider residential areas and active travel routes will need to be improved to support the sustainability of the strategic site and area.

Due to the linguistic sensitive areas within this Plan Area as well as the size of the development, a Welsh language impact assessment is required in line with TAN 20 as well as the Welsh Language Standards, which requires an impact assessment into both positive and adverse effects and opportunities to support and promote the use of Welsh.

When conducting the impact assessment, this will be an opportunity to promote and support the use of the Welsh language as well as to mitigate any adverse effects from the development at Llanfairfechan and its surrounding areas.

The assessment should consider how the allotments being developed and any other social and recreational plans in the area of the Plan are developed in a way that promotes and supports increasing use of Welsh in everyday life.

## Summary of conclusions of WLIA on five sites

In planning the school development, the impact assessment will need to consider the impact on the Welsh language and opportunities to promote and support the Welsh in Education Strategic Plan and the Welsh language strategy to increase the Welsh speakers in Conwy by 2%.

### Coastal Development Strategy Area: Creuddyn

A mixed-use Strategic Site is proposed at Llanrhos between the urban settlements of Llandudno Junction and Llandudno consisting of 250 new homes (including affordable housing), approximately 1 hectare of B1 (office) to promote cluster employment uses, new primary school, allotments and recreational space. The area is also recognised as an area in need of improved public transport, active travel and green infrastructure, which will be progressed via a comprehensive Development Brief. The Strategic Site is phased from 2024 onwards to ensure it links with the 'Band C' School Modernisation Programme.

Creuddyn, Llandudno, Llandudno Junction and Conwy are the main urban settlements within this area, performing an important cultural, social and economic role to the Plan Area. Conwy has a population of 27.3% Welsh speakers (3,901) and Llandudno has 20.3% (4,079) and they are both linguistic sensitive areas within this LDP area (as defined by the threshold in Planning and the Welsh language: the way ahead, 2005).

Due to the excellent transport links and strategic positions of these towns, the Preferred Strategy predicts a growth in these towns:

- Over the Plan Period it is projected that approximately 30% of the housing growth (market and affordable) will be located within the Creuddyn Strategic Area consisting of completions, permissions, windfall and new allocations.
- To ensure the needs of the Conwy Commercial Market Analysis Report conclusions are delivered, the area will also accommodate approximately 30% of employment land consisting of completions, permissions and new allocations.

A mixed-use strategic site is proposed at Llanrhos between the urban settlements of Llandudno Junction and Llandudno consisting of 250 new homes (including affordable housing), 1 hectare of B1 (office) to promote cluster employment uses, new primary school and recreational space.

The area is also recognised as an area in need of improved public transport, active travel and green infrastructure, which will be progressed via a comprehensive Development Brief. The strategic site is phased from 2024 onwards to ensure it links with the 'Band C' School



## Summary of conclusions of WLIA on five sites

Modernisation Programme. The strategic site is supported by excellent accessibility to the A470 and A55 and alternative modes into the higher order urban settlements.

Due to size of the proposal (more than 10 units and 10,000 sq. metres) means that this allocated site within the Preferred Strategy will require a Welsh language impact assessment in line with TAN 20 guidance.

Llandudno and Conwy are amongst the main urban settlements within this Plan Area. Conwy has a population of 27.3% Welsh speakers (3,901) and Llandudno has 20.3% (4,079) and they are linguistic sensitive areas due to the percentages (as defined by Conwy's Welsh language planning policy and guided by the threshold in Planning and the Welsh language: the way ahead, 2005). Furthermore, the numbers of Welsh speakers are significant overall to Conwy and nationally.

Whereas the mixed-use site being proposed is at Llanrhos, it is strategically placed near Conwy which is a linguistic sensitive area where 27.3% of the population speak Welsh and Llandudno which is a strategically important area where 20.3% of the population speak Welsh. There are also other communities nearby e.g. Mochdre, Deganwy where the percentage of Welsh speakers is above the national average: and therefore, the whole area is strategically important.

As recommended in Planning and the Welsh language: the way ahead (2005) these require an impact assessment.

The assessment needs to consider both the positive and negative impacts for the wider area surrounding the sites that have been earmarked for development. Both employment and housing development can have effects both in the locale and wider than the conurbation where building supply is allocated. This assessment needs to consider the potential impact on inward and outward migration from Welsh speaking areas and where this is found, to put mitigation measures in place. Some mitigation tools that may be considered include training and support for local people to access and gain new employment being developed locally. Section 106 agreements could also be used to fund Welsh medium activities in the community to strengthen sustainable and resilient places.

The assessment will also identify the potential for this area to promote and support increased use of the Welsh language going forward including putting plans in place to support recreational activities through the medium of Welsh within the new developments and opportunities for Welsh speakers from surrounding areas to access and use these opportunities.

## Summary of conclusions of WLIA on five sites

The assessment will also include consideration of the planned school provision and how this will promote use of Welsh amongst children and young people and contribute to Conwy's Welsh language strategy to increase the percentage of Welsh speakers in the county borough by 2% over the next 5-year period.

### Coastal Development Strategy Area: Central

A Strategic Site to the south of Old Colwyn consisting of 450 new homes, allotments and recreational space. The Strategic Site will be phased from 2024 onwards to consider Band C School Impacts. Following the frontloading approach, the site may need to accommodate improvements to the wider highway network, improved public transport service and active travel linkages. Hydraulic Modelling is also underway to determine whether capacity improvement works will be required to the water supply and sewerage/drainage infrastructure.

Over the Plan Period it is projected that approximately 35% of the housing growth (market and affordable) will be located within the Central Strategic Area consisting of completions, permissions, windfall and new allocations.

To ensure the needs of the Conwy Commercial Market Analysis Report conclusions are delivered, the area will also accommodate approximately 10% of employment land consisting of completions, permissions and new allocations.

Colwyn Bay serves the residential, retail and economic needs of the surrounding catchment and continues to undergo significant investment and improvement to the town centre and beach frontage. It is situated along the strategic rail and road network and served well via public and alternative modes of transport.

To continue investment and further regenerate the area over the Plan Period, a strategic site to the south of Old Colwyn consisting 450 new homes and recreational spaces has been allocated.

The strategic site will be phased from 2024 onwards and be supported by highway improvements, improved public transport service and active travel linkages.

Improvements to the nearby primary and secondary schools may also require redevelopment to accommodate growth during the Band C School Modernisation Programme from 2024 onwards as a result of housing growth.

New convenience and comparison retailing will also be promoted in Colwyn to meet the needs of the Conwy Retail Study.

## Summary of conclusions of WLIA on five sites

The Tier 2 Village of Llysfaen is also located within the CDSA due to its relationship to Old Colwyn, whilst the Hamlet of Bryn y Maen is closely related to upper Colwyn Bay, however the sustainability of these settlements is limited by the strategic linkages to the main roads and the public transport network. The policy approach to these settlements over the Plan Period will be informed by their position in the settlement hierarchy, with the level of growth reflecting local needs and the current range of facilities and services that they offer.

This area includes several areas of strategic importance to the Welsh language. For example, Mochdre (22.5%), Old Colwyn, (21.9%) and Llysfaen (21.1%), where the percentage of the population able to speak Welsh is above the national average. In Old Colwyn, the number of Welsh speakers is significant for the County with 1,719 able to speak Welsh in the community council area, Rhos on Sea is also in this area where 18.4% (1,366) of the population speaks Welsh. Due to the culmination of these sites in this area, and the size of the LDP site, a Welsh language impact assessment is required in accordance with TAN 20 and the Conwy's Welsh language planning policy.

This assessment will include an analysis of both the positive and negative impacts of housing growth (35% of the overall plan) on the Welsh language and their communities, including but not limited to Old Colwyn, Llysfaen and Bryn y Maen, but also the surrounding areas and the overall cumulative effects. This assessment will consider how to mitigate negative effects and promote the use of the Welsh language more broadly.

The impact assessment on the Welsh language will look at the employment opportunities being proposed in the plan to ensure that these offer opportunities for local people to access and also ensure that these proposals help support sustainable and resilient Welsh speaking communities in the area.

It will also need to include consideration of the impact on Welsh medium and bilingual education in the area, linking with the Welsh in Education Strategic Plan for the county borough. Considerations will include the language medium of both primary and secondary schools, the effect on language categorisation of the schools, and the impact of development on school places and overall numbers, as well as knock-on effects on communities due to school location and cohort decisions.

### Coastal development Strategy Area: East

Mixed Use Employment (4.7 Hectares of B1, B2 & B8), Recreational Space and a Primary School. The site is phased between 2021 and 2027.

## Summary of conclusions of WLIA on five sites

Abergele South East forms a key project within the North Wales Growth Deal. The site was previously allocated in the Adopted LDP and as such careful consideration has been given to re-allocating the Key Strategic Site for mixed-use Employment (4.7 Hectares of B1, B2 & B8), Convenience Retail, Allotments, Recreational Space and a Primary School.

Key to delivery of the site is the available capacity in the highway network and town centre to accommodate the growth without the need for significant highway infrastructure improvement in the town centre. Evidence suggests that the town centre traffic lights are at capacity and further growth and related traffic would be detrimental without town centre interventions (e.g. a gyratory or one-way system).

In Abergele, 2,014 speak Welsh, which is 19.6% of the population, according to the 2011 Census and therefore has the largest number of Welsh speakers by community council in Conwy. Abergele has been identified as a strategically important one for the Welsh language in the area. This site is also close to Pensarn electoral ward where 28.4% of the population speaks Welsh – which is a linguistic sensitive area. Llanddulas, Rhyd y Foel and Llysfaen are also close by, where 19%+ of the population can speak Welsh.

This Plan Area is situated to the east on the coastline of Conwy and together with its spatial distribution, could potentially help alleviate some of the impact of this proposed development on the rural heartlands and other Welsh linguistic sensitive sites. However due to it being a large development and the importance of Abergele and its environs, there is potential for this to attract inward commuting and/or migration from the East. Both retail and employment could attract Welsh speakers from heartlands to Abergele out of rural communities.

Due to the size and scale of this site, TAN 20 guidance says that a Welsh language impact assessment is required. This would also be in line with the Welsh language standards and good practice – that significant policy decisions are impact assessed. This will provide an opportunity to promote and support the use of the Welsh language as well as to ensure that mitigation measures are in place so as not to adversely affect the Welsh language.

### Rural Development Strategy Area

#### 1. Llanrwst

Whereas 90% of the development is proposed for the urban areas listed above, 10% is allocated for rural development. It is proposed that the majority of rural growth is focused in Llanrwst.

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Llanrwst is the largest and most sustainable of the settlements falling within the RDSA, located some 13 miles from the urban settlements of Llandudno Junction and Conwy. Llanrwst is a settlement that supports the wider rural communities in terms of employment, retailing and community services and facilities. It is served primarily by the A470 trunk road, with the A548 and B5106 also providing local road links, whilst the Conwy Valley Rail Line connects to the coastal strategic rail network.

To encourage development in sustainable locations, a Llanrwst strategic site is proposed consisting of 200 new homes (market and affordable) and recreational spaces along the A470. Vacant employment land at the Tŷ Gwyn Industrial Site will also be safeguarded for future development. Convenience retailing will also be promoted in Llanrwst to meet the needs identified.

The Llanrwst settlement boundary will be reviewed. Development outside, but on the edge of, the Llanrwst settlement boundary will be permitted, in exceptional circumstances to support changes in employment demand and deliver higher levels of affordable housing up to 20 dwellings and where there are no unacceptable impacts.

Llanrwst is a linguistic sensitive area with 61% of the population able to speak Welsh. An area with such a significant percentage of Welsh speakers is defined as a Welsh language heartland (Aitchison, J. and Carter, H. (1998)). The Welsh language is used day to day and in daily life and is the main hub for many Welsh speaking heartlands close by. The Welsh language is part of the fabric of the area and is also strategically important to national policy – Cymraeg 2050.

Furthermore, Llanrwst is strategically important as a town. On the doorstep to many more linguistic sensitive areas in the region (e.g. Trefriw, Llanddoged, Maenan), Llanrwst is typically a service hub of those areas and supports sustainable rural communities more widely.

In summary, Llanrwst is an important strategic site which contributes to the authority's Welsh language strategy and the national strategy of creating a million Welsh speakers by 2050. The size of the proposed housing development in this region is large and TAN 20 requires a Welsh language impact assessment.

Housing development in Welsh linguistic sensitive areas and rural heartlands more widely, are known to potentially impact house prices and net migration effects. The affordable housing to be provided on the strategic site is likely to be around 40-60 units, but exact numbers are dependent on the affordable housing policy. This programme should be assessed for its potential to promote the use of Welsh and prevent negative impacts. The assessment must ensure it meets the needs of Welsh speakers in the area. The impact assessment will need to



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carefully consider the potential effects of housing growth in the region and how it can safeguard the health of the Welsh language in it.

As part of this assessment, the impacts on local businesses will need to be assessed to identify the potential effects on existing businesses and local jobs. Any negative impacts will need mitigation measures. This assessment should include considering the impacts on jobs for Welsh speakers and opportunities to sustain and enhance services and facilities available through the medium of Welsh for people.

The assessment should also address ways to promote and support the sustainability and resilience of communities in this area in line with national policy on placemaking (Planning Policy Wales, 2018).

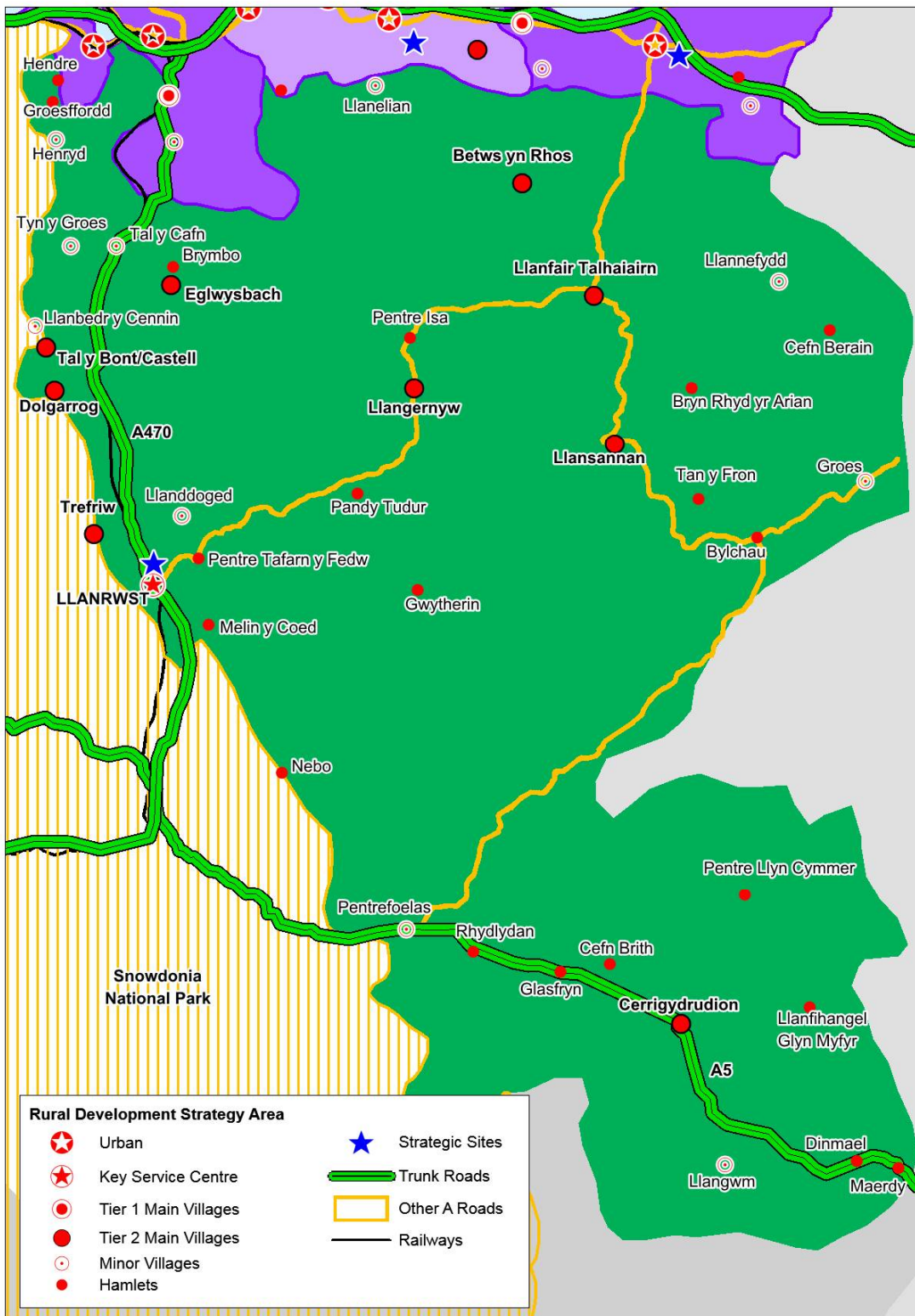
The recreational and retail being proposed within the Plan will be assessed to promote their availability through the medium of Welsh.

### 2. Tier 2 Villages in rural Conwy

Most of the Tier 2 Main Villages, Minor Villages and Hamlets are also located within the RDSA with levels of employment and housing growth in these communities related to their needs for economic and residential development, based on the settlement hierarchy.

This is the rural heartland of Conwy where the Welsh language is spoken by the majority and there are main linguistic sensitive sites with much in excess of the threshold of 25% of Welsh speakers in the population (recommended in the Planning and the Welsh language: the way ahead report (2005). Please see map 6 below:

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## Summary of conclusions of WLIA on five sites

There are Tier 2 Main Villages, Minor Villages and Hamlets located within the Rural Development Strategy Area and many of these are linguistic sensitive areas e.g. Cerrigydrudion (77.2%), Llangernyw (64.4%), Betws yn Rhos (46.4%). Where the Welsh language is spoken by half or more, they are considered Welsh language heartlands, as defined by Aitchinson et al (1998) and the Welsh language is part of the social fabric of the community. Most areas have higher than the 25% threshold set in Planning and the Welsh language: the way ahead report, and the majority have above the national percentage of Welsh speakers of 19%.

It is vital that the Tier 2 Main Villages are sustainable and resilient in order to ensure the county borough has sustainable places in line with placemaking in Planning Policy Wales (2018). These settlements primarily serve their local population and as such local growth and diversification will be promoted to retain community identity, protect the Welsh Language and encourage a more balanced age structure.

The Preferred Strategy says that allocated sites will be related to the local need for economic and residential development, based on the settlement hierarchy. No figures have been provided for new developments in these areas.

The Preferred Strategy states that land will not be allocated for new development. Alternatively, a flexible approach will be promoted within the settlement boundaries. This is consistent with TAN 6 guidance – offering flexibility in rural communities.

New enterprises and business expansions will be supported in the Tier 2 Villages. A constructive approach towards agricultural development proposals will also be adopted, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation. A positive approach to the conversion of rural buildings for business reuse, in addition to taking a positive approach to diversification projects in rural areas will be adopted.

In light of the challenges highlighted in the Preferred Strategy for these rural areas arising from the UK leaving the EU, constructive and flexible approaches to agriculture diversification and new enterprise could help support and promote these sustainable rural communities.

The Preferred Strategy says that both market and affordable housing may be permitted within the settlement boundaries on windfall and allocated sites. The viability of housing



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schemes will determine the appropriate level of market and affordable housing. Such schemes will generally be smaller than the higher order settlements and be restricted to 15 units and below to protect the natural and historical environment. Affordable housing exception sites and employment opportunities may be permitted outside, but on the edge of, settlement boundaries at a scale appropriate to the function of the settlement and where there are no unacceptable impacts.

Due to the number of linguistic sensitive sites in this area, a Welsh language impact assessment would be required with mitigation measures if there were any developments in this area.

Mitigation measures that could be usefully considered are targeted affordable housing for local Welsh speakers to reduce the risk of outward migration, as well as use of s106 agreements in line with TAN 6 to provide additional funding for the council to promote and support the use of the Welsh language and create resilient and sustainable Welsh speaking communities. Mitigation measures could include but not be limited to: free Welsh language courses in the community, Welsh language awareness packs for any new residents moving to the area, financial support for Welsh medium social and recreational activities in the community and increased services in the community through the medium of Welsh.