

CYNLLUN DATBLYGU LLEOL CONWY 2007 – 2022

CONWY LOCAL DEVELOPMENT PLAN 2007 – 2022



ADRODDIAD ADOLYGU – ADRODDIAD SYLWADAU

REVIEW REPORT – REPRESENTATION REPORT

Ebrill 2018
April 2018

Mae'r ddogfen hon ar gael i'w gweld a'i lawrlwytho ar wefan y Cyngor ar: www.conwy.gov.uk/cdll 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, Adeilad y Llyfrgell, Mostyn Street, Llandudno, LL30 2RP neu drwy ffonio (01492) 575461. Os hoffech gael gair â swyddog cynllunio sy'n gweithio ar y Cynllun Datblygu Lleol ynglŷn ag unrhyw agwedd o'r ddogfen hon, cysylltwch â'r Gwasanaeth Polisi Cynllunio Strategol ar (01492) 575181/575445/575124/574232.

Os hoffech gael dyfyniad neu grynodedb o'r ddogfen hon ar gasét, mewn print bras, mewn Braille neu ar unrhyw ffurf arall, ffoniwch y Gwasanaeth Polisi Cynllunio Strategol ar (01492) 575461.

Mae'r ddogfen hon yn cynnwys sylwadau gwreiddiol Cymraeg a Saesneg gan y cyhoedd, ac o'r herwydd, nid ydynt yn cael eu cyfieithu.

This document is available to view and download on the Council's web-site at: www.conwy.gov.uk/ldp . Copies are also available to view at main libraries and Council offices and can be obtained from the Strategic Planning Policy Service, Library Building, Mostyn Street, Llandudno, LL30 2RP or by telephoning (01492) 575461. If you would like to talk to a planning officer working on the Local Development Plan about any aspect of this document please contact the Strategic Planning Policy Service on (01492) 575181 / 575445 / 575124 / 574232.

If you would like an extract or summary of this document on cassette, in large type, in Braille or any other format, please call the Strategic Planning Policy Service on (01492) 575461.

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

Review Report***Section Introduction******1.1******Rep No Name Type Representation Summary***

27260	Abergele Town Council (Mrs Lorraine Whalley) [6150]	Comment	This Council notes the progress being made by CCBC in relation to the LDP Review Report.
-------	---	---------	--

<i>Section</i>		<i>Vision and Objectives</i>	
		<i>3.3</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27170	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	The HBF suggest that this would be a good point to include a reference to the potential impact of the North Wales Growth Deal and its ambitions for economic growth which will need to be matched by the provision of new homes in the right locations. There doesn't appear to be any mention of it anywhere else in the document.

<i>Section</i>		<i>LDP Strategy</i>	
		<i>4.4</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27208	Anwyl Construction Ltd [2038]	Object	Failure to deliver the envisaged number of windfalls: The windfall allowance was calculated by using a 5 year past trend and doubling it. As the Inspector reported (para 5.35) "simply doubling this figure by way of extrapolation to 2022 introduces a greater degree of uncertainty...". The Plan also relies on a high percentage of windfalls (29%) coming forward. The risk of failure from windfall not being achieved was therefore reasonably predictable.
27226	Beech Developments (NW) Ltd [765]	Object	Failure to deliver the envisaged number of windfalls: The windfall allowance was calculated by using a 5 year past trend and doubling it. As the Inspector reported (para 5.35) "simply doubling this figure by way of extrapolation to 2022 introduces a greater degree of uncertainty...". The Plan also relies on a high percentage of windfalls (29%) coming forward. The risk of failure from windfall not being achieved was therefore reasonably predictable.
27171	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	The current commentary on windfall sites is one sided and does not include a number of the factors that could have an effect on the level of windfall development. <i>Change To Plan Sought:</i> Additional text requires to provide a more balance discussion.
27244	Macbryde Homes Ltd [2074]	Object	Failure to deliver the envisaged number of windfalls: The windfall allowance was calculated by using a 5 year past trend and doubling it. As the Inspector reported (para 5.35) "simply doubling this figure by way of extrapolation to 2022 introduces a greater degree of uncertainty...". The Plan also relies on a high percentage of windfalls (29%) coming forward. The risk of failure from windfall not being achieved was therefore reasonably predictable.

<i>Section</i>	<i>LDP Strategy</i>		
	<i>4.7</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27261	CCBC (Mr Dyfed Rowlands) [6156]	Comment	<p>While it is acknowledged that Tir Llwyd is unlikely to demonstrate compliance with TAN15 requirements when considering 75 years of climate change, present day risk to the site is generally acceptable. However, given that the site is at lower risk than most of the community which it serves there is clear over-riding justification for development of the site to support the community until such time as it may stop being viable to protect the area.</p> <p><i>Change To Plan Sought:</i></p> <p>Any development at Tir Llwyd should therefore allow for regular monitoring of changes to flood risk and accept that should necessary improvements not be forthcoming this may lead to the lifetime of development being reduced.</p> <p>Change of use within flood risk areas should be seen as an opportunity to improve resilience and adapt to climate change risks.</p>

<i>Section</i>		<i>LDP Strategy</i>	
		<i>4.9 LDP Housing Requirements</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27209	Anwyl Construction Ltd [2038]	Object	The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged. <i>Change To Plan Sought:</i> The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged.
27210	Anwyl Construction Ltd [2038]	Object	The revision to TAN1 (2015) has not exacerbated the housing land supply position. It provided a standardised method of calculating housing land supply. The consequence is that Local Authorities cannot not use alternative methods of calculation (such as previous build rates) to rely on past performance a measure of success nor to continue to set aside their responsibilities to plan for the delivery of housing in accordance with National Planning Policy. <i>Change To Plan Sought:</i> The review report should reflect this.
27228	Beech Developments (NW) Ltd [765]	Object	The revision to TAN1 (2015) has not exacerbated the housing land supply position. It provided a standardised method of calculating housing land supply. The consequence is that Local Authorities cannot not use alternative methods of calculation (such as previous build rates) to rely on past performance a measure of success nor to continue to set aside their responsibilities to plan for the delivery of housing in accordance with National Planning Policy. <i>Change To Plan Sought:</i> The review report should reflect this.
27227	Beech Developments (NW) Ltd [765]	Object	The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged. <i>Change To Plan Sought:</i> The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged.
27158	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	HBF objects to the statement that the 'LDP target was unrealistic'. HBF objects to the statement 'This issue was exacerbated in 2015 by changes to TAN1'. <i>Change To Plan Sought:</i> Amend wording accordingly.
27246	Macbryde Homes Ltd [2074]	Object	The revision to TAN1 (2015) has not exacerbated the housing land supply position. It provided a standardised method of calculating housing land supply. The consequence is that Local Authorities cannot not use alternative methods of calculation (such as previous build rates) to rely on past performance a measure of success nor to continue to set aside their responsibilities to plan for the delivery of housing in accordance with National Planning Policy. <i>Change To Plan Sought:</i> The review report should reflect this.

<i>Section LDP Strategy</i>			
<i>4.9 LDP Housing Requirements</i>			
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27245	Macbryde Homes Ltd [2074]	Object	The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged.
		<i>Change To Plan Sought:</i>	The LDP housing target was not unrealistic. It was evidence based, consulted upon at Deposit, Examined and found to be Sound. This should be explicitly acknowledged.

<i>Section</i>		<i>LDP Strategy</i>	
		<i>4.10</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27211	Anwyl Construction Ltd [2038]	Object	<p>PPW para 9.2 does not state that Local Authorities should reduce the emphasis given to WG household projections when determining LDP housing requirements. In fact para 9.2 states they must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community and must take account of...the Welsh Governments later household projections. The must also take account of a number of other sources including local housing needs and demands, the needs of the local and national economy and social considerations (including unmet need).</p> <p><i>Change To Plan Sought:</i> The Review Report must reflect this.</p>
27247	Macbryde Homes Ltd [2074]	Object	<p>PPW para 9.2 does not state that Local Authorities should reduce the emphasis given to WG household projections when determining LDP housing requirements. In fact para 9.2 states they must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community and must take account of...the Welsh Governments later household projections. The must also take account of a number of other sources including local housing needs and demands, the needs of the local and national economy and social considerations (including unmet need).</p> <p><i>Change To Plan Sought:</i> The Review Report must reflect this.</p>
27229	Beech Developments (NW) Ltd [765]	Object	<p>PPW para 9.2 does not state that Local Authorities should reduce the emphasis given to WG household projections when determining LDP housing requirements. In fact para 9.2 states they must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community and must take account of...the Welsh Governments later household projections. The must also take account of a number of other sources including local housing needs and demands, the needs of the local and national economy and social considerations (including unmet need).</p> <p><i>Change To Plan Sought:</i> The Review Report must reflect this.</p>

<i>Section</i>		<i>LDP Strategy</i>	
		<i>4.11 Conclusion</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27187	Dwr Cymru Welsh Water (Mr Dewi Griffiths) [6050]	Comment	<p>We note that the Review will need to reconsider both the scale and distribution of growth proposed, and that the capacity of settlements to absorb additional employment and residential development will need to be assessed in light of the evidence to be collected through the Review. Since the LDP was adopted in 2013 it will be necessary for us to reassess the capacity of our infrastructure to accommodate growth.</p> <p><i>Change To Plan Sought:</i> As we utilise the growth information contained within LDPs to inform the AMP capital investment in our infrastructure we would welcome engagement at the earliest possible stage regarding potential growth options and changes to allocations to allow us the opportunity to advise on potential infrastructure capacity constraints.</p>
27188	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	<p>The review should consider larger scale windfall developments and allocations within and adjacent to Tier 1 Villages in order to achieve shortfalls in the Rural Development Strategy Areas (RDSA) identified in paragraph 4.5.</p>
27207	Anwyl Construction Ltd [2038]	Object	<p>Rather than the Review Report using language which suggests a need to reduce the housing supply the Council should be taking positive and continuing steps to enable delivery of housing, including in a replacement LDP.</p> <p>Additional, suitable, viable land attractive to the market in sustainable places where people want to live is available and capable of contributing to housing delivery.</p> <p><i>Change To Plan Sought:</i> The Review should proactively set out the intent to review all such sources and to deliver land to address the existing undersupply and unmet need and deliver new housing alongside the economic growth agenda.</p>
27225	Beech Developments (NW) Ltd [765]	Object	<p>Rather than the Review Report using language which suggests a need to reduce the housing supply the Council should be taking positive and continuing steps to enable delivery of housing, including in a replacement LDP.</p> <p>Additional, suitable, viable land attractive to the market in sustainable places where people want to live is available and capable of contributing to housing delivery.</p> <p><i>Change To Plan Sought:</i> The Review should proactively set out the intent to review all such sources and to deliver land to address the existing undersupply and unmet need and deliver new housing alongside the economic growth agenda.</p>
27243	Macbryde Homes Ltd [2074]	Object	<p>Rather than the Review Report using language which suggests a need to reduce the housing supply the Council should be taking positive and continuing steps to enable delivery of housing, including in a replacement LDP.</p> <p>Additional, suitable, viable land attractive to the market in sustainable places where people want to live is available and capable of contributing to housing delivery.</p> <p><i>Change To Plan Sought:</i> The Review should proactively set out the intent to review all such sources and to deliver land to address the existing undersupply and unmet need and deliver new housing alongside the economic growth agenda.</p>

<i>Section</i>		<i>LDP Strategy</i>	
		<i>4.11 Conclusion</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27248	Macbryde Homes Ltd [2074]	Object	<p>There is no mention of the suitability of sites allocated for housing in the plan or indeed their potential to become available. For example there has been subsequent research on the need to look at deliverability and viability far more closely than in previously LDPs (WG study 'Longitudinal Viability Study of the Planning Process').</p> <p>Furthermore case studies (including in Conwy) suggest permissions not being released as a result of delays in signing S106 agreements.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>
27230	Beech Developments (NW) Ltd [765]	Object	<p>There is no mention of the suitability of sites allocated for housing in the plan or indeed their potential to become available. For example there has been subsequent research on the need to look at deliverability and viability far more closely than in previously LDPs (WG study 'Longitudinal Viability Study of the Planning Process').</p> <p>Furthermore case studies (including in Conwy) suggest permissions not being released as a result of delays in signing S106 agreements.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>
27159	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	<p>There is no comment on the fact that some of the previously allocated sites may have in fact been the wrong sites to allocate, particularly any rolled over from previous plans.</p> <p>No account taken of the issues identified in the WG Longitudinal and Viability study regarding site viability and deliverability.</p> <p><i>Change To Plan Sought:</i> The HBF would request an additional paragraph which refers to the WG Longitudinal viability study and looks at the issues identified in the report in more detail thus giving a more balanced view.</p>
27212	Anwyl Construction Ltd [2038]	Object	<p>There is no mention of the suitability of sites allocated for housing in the plan or indeed their potential to become available. For example there has been subsequent research on the need to look at deliverability and viability far more closely than in previously LDPs (WG study 'Longitudinal Viability Study of the Planning Process').</p> <p>Furthermore case studies (including in Conwy) suggest permissions not being released as a result of delays in signing S106 agreements.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.1.3</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27160	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	A further review of CIL has now been announced by central government and it should also be noted that CIL powers will be devolved to Wales in April 2018.
27232	Beech Developments (NW) Ltd [765]	Comment	A further review of CIL has now been announced by central government. CIL powers will be devolved to Wales in April 2018.
27250	Macbryde Homes Ltd [2074]	Comment	A further review of CIL has now been announced by central government. CIL powers will be devolved to Wales in April 2018.
27214	Anwyl Construction Ltd [2038]	Comment	A further review of CIL has now been announced by central government. CIL powers will be devolved to Wales in April 2018.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.2.1</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27186	Campaign for the Protection of Rural Wales (Mr Peter Detheridge) [35]	Comment	<p>I find the report to be a thorough, comprehensive and valuable document. It has been clear for some time that the currently adopted LDP has become out of date in respect of housing, such that the Plan has arguably lost credibility by its inability to control the location of new housing. Whilst housing seems to me to be the key element that needs to be reassessed clearly there are other aspects of the Plan that need to be amended particularly to reflect the needs of recalculated population projections.</p> <p><i>Change To Plan Sought:</i> However, as I am conscious of the urgent need to produce a Reviewed Plan and the length of time of the Plan production process, I feel that the number of issues to be reviewed should consequently be kept to the absolute minimum possible.</p>
27161	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	<p>The HBF does not believe it is right to state that the build rate is 'extremely ambitious', as it was proven and agreed at the time of the plans adoption.</p> <p><i>Change To Plan Sought:</i> Amend wording to 'ambitious'.</p>
27251	Macbryde Homes Ltd [2074]	Object	<p>The build rate is not 'extremely ambitious'. The evidence at Examination supported it including capacity in the housebuilding industry along with housing need. The current LHMA (2016-2021) shows a need for at least 199 affordable housing units per year.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>
27215	Anwyl Construction Ltd [2038]	Object	<p>The build rate is not 'extremely ambitious'. The evidence at Examination supported it including capacity in the housebuilding industry along with housing need. The current LHMA (2016-2021) shows a need for at least 199 affordable housing units per year.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>
27233	Beech Developments (NW) Ltd [765]	Object	<p>The build rate is not 'extremely ambitious'. The evidence at Examination supported it including capacity in the housebuilding industry along with housing need. The current LHMA (2016-2021) shows a need for at least 199 affordable housing units per year.</p> <p><i>Change To Plan Sought:</i> The review report should reflect this.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		5.2.2	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27216	Anwyl Construction Ltd [2038]	Object	<p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p> <p><i>Change To Plan Sought:</i></p> <p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p>
27162	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	<p>The economic down turn happened between 2008 and 2013 so it is incorrect to refer to it as being over recent years. In fact in recent years the number of homes in Wales has been on the increase particularly since the introduction of Help to Buy Wales in 2014, this scheme is funded until at least 2021 so there is no current reason why this should not continue to support the purchase of new homes of which currently 78% are by first time buyers.</p> <p><i>Change To Plan Sought:</i></p> <p>The reference to the current recession should be removed and the positive impact of Help to buy should be referred to in this section.</p>
27252	Macbryde Homes Ltd [2074]	Object	<p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p> <p><i>Change To Plan Sought:</i></p> <p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p>
27234	Beech Developments (NW) Ltd [765]	Object	<p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p> <p><i>Change To Plan Sought:</i></p> <p>The UK has not been in recession since 2013. The Review report should reflect this and look to the other reasons (many of which are identified in full) why the plan has not delivered. Help to buy should be referred to in this section.</p>

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.2.4</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27163	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	If any of the suggested changes already made in response to earlier sections of the document are made then this paragraph will also need to be amended particularly around the fact it blames the recession as the main reason for not achieving a 5 year land supply. Reference should also be made to the WG study 'Longitudinal Viability Study of the Planning Process' in this paragraph.
27172	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Comment	A review of the land allocations is overdue and there is evidence of local hoarding of land to the disadvantage of other applicants. Only genuine sites over 10 units should be retained and contingency sites removed. I support a review of the boundaries. The rural settlement strategy requires review. I would like the LDP to set an upper limit on any site attempting to circumvent the LDP at 20 dwellings. A review of green barriers should link in with this work. Housing allocations in Llanfairfechan need to be updated. Colwyn Bay housing supply needs increasing.
27189	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	Housing land allocations should be reviewed and new deliverable sites allocated through a call for candidate sites. In addition, windfall site and allocations within and adjacent to in Tier 1 villages should not be capped in size as this limits the ability of the market to deliver housing where there is a demand and which otherwise would be consistent with the thrust of the LDP.

<i>Section</i>	<i>Policy Introduction</i>		
	5.2.5		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27217	Anwyl Construction Ltd [2038]	Object	<p>Other appeal decisions in the area have not been allowed despite the lack of five year land supply. A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case. The lack of success on appeal where the council has less than a five year land supply is a cross-Wales issue.</p> <p><i>Change To Plan Sought:</i></p> <p>A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case.</p>
27253	Macbryde Homes Ltd [2074]	Object	<p>Other appeal decisions in the area have not been allowed despite the lack of five year land supply. A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case. The lack of success on appeal where the council has less than a five year land supply is a cross-Wales issue.</p> <p><i>Change To Plan Sought:</i></p> <p>A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case.</p>
27235	Beech Developments (NW) Ltd [765]	Object	<p>Other appeal decisions in the area have not been allowed despite the lack of five year land supply. A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case. The lack of success on appeal where the council has less than a five year land supply is a cross-Wales issue.</p> <p><i>Change To Plan Sought:</i></p> <p>A balanced view should therefore be given to avoid the wording suggesting housebuilders will be able to win any appeal - which is clearly not the case.</p>
27164	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	<p>This section is currently misleading and does not give a balance picture of the situation. There are other appeal decisions in the area which have not been granted even though there is a lack of five year land supply, so this needs to be explained to give a more balanced view.</p> <p><i>Change To Plan Sought:</i></p> <p>This section should be reworded to give a more balanced view of the situation relating to housing development allowed on appeal.</p>

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.2.8</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27254	Macbryde Homes Ltd [2074]	Comment	It would be helpful to provide a table of developed sites along with the level of affordable housing achieved. Where below policy requirement provide a reason to give a balanced view.
27236	Beech Developments (NW) Ltd [765]	Comment	It would be helpful to provide a table of developed sites along with the level of affordable housing achieved. Where below policy requirement provide a reason to give a balanced view.
27218	Anwyl Construction Ltd [2038]	Comment	It would be helpful to provide a table of developed sites along with the level of affordable housing achieved. Where below policy requirement provide a reason to give a balanced view.
27165	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	The HBF suggests that it would be helpful to give some examples of why the level of affordable housing has not been delivered. Is it for instance as a result of site viability issues. Alternatively examples could be reference in an Appendix where a table of sites developed is provided with the level of affordable achieved and if below policy requirement the reason why this is the case.
27179	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	This policy has led to a virtual stop in new conversions harming the supply of homes in rural areas at a time when village supply has also been brought to a near halt. The policy is in need of review so I would build in more flexible criteria to kickstart rural hopes.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.2.9</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27237	Beech Developments (NW) Ltd [765]	Comment	Other Councils in north Wales now actively delivering affordable housing units through their own delivery vehicles and through the delivery to those companies of "gifted units" as part of developments. This provides early delivery to known needs.
27255	Macbryde Homes Ltd [2074]	Comment	Other Councils in north Wales now actively delivering affordable housing units through their own delivery vehicles and through the delivery to those companies of "gifted units" as part of developments. This provides early delivery to known needs.
27219	Anwyl Construction Ltd [2038]	Comment	Other Councils in north Wales now actively delivering affordable housing units through their own delivery vehicles and through the delivery to those companies of "gifted units" as part of developments. This provides early delivery to known needs.
27166	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	If the Council are planning to start building its own Council Housing this would be the place to refer to it and explain how this might help in the delivery of more affordable homes as it would not be reliant on securing a percentage of affordable as part of a larger private site.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.2.11</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27167	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Comment	Wording should be added to explain that this additional affordable housing need does not automatically mean that the policy requirement within the plan will be set higher than before as other issues such as viability will have to be considered. Also the current level has not been achieved (and if this is down to viability) an increase in policy requirement would juts potentially result in less houses both private and affordable coming forward.
27220	Anwyl Construction Ltd [2038]	Object	<p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously. Viability is critical and any increase in affordable requirement may potentially reduce the overall number of houses delivered .</p> <p><i>Change To Plan Sought:</i></p> <p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously.</p>
27238	Beech Developments (NW) Ltd [765]	Object	<p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously. Viability is critical and any increase in affordable requirement may potentially reduce the overall number of houses delivered.</p> <p><i>Change To Plan Sought:</i></p> <p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously.</p>
27256	Macbryde Homes Ltd [2074]	Object	<p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously. Viability is critical and any increase in affordable requirement may potentially reduce the overall number of houses delivered.</p> <p><i>Change To Plan Sought:</i></p> <p>This additional affordable housing need should not automatically mean the Affordable Housing policy requirement will be set higher than previously.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.2.18 Gypsy & Traveller Sites</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27155	Mr Paul Luckock [146]	Object	<p>The LDP should be more specific in respect of paragraphs 5.2.18 to 5.2.23.</p> <p>New residential and transit provision for Gypsy/Travellers should be available as soon as possible.</p> <p>If land is not allocated in the LDP the ongoing struggles of private or local authority developers to get sites approved and built will continue.</p> <p>A seven pitch transit site may not accommodate demand because Gypsy/Travellers are a diverse group and Irish Travellers, Romany Gypsy and New Age Travellers maybe unwilling to share one transit site?</p> <p><i>Change To Plan Sought:</i> Though the GTANA(2017) indicated the need for only one residential site and further provision of 3% per annum, a small residential site of say four pitches should be allocated in the LDP.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.3.1 Poor take-up of employment land</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27239	Beech Developments (NW) Ltd [765]	Support	The developers strongly welcome and support full review of existing employment allocations to identify any that could be released to housing.
27221	Anwyl Construction Ltd [2038]	Support	The developers strongly welcome and support full review of existing employment allocations to identify any that could be released to housing.
27257	Macbryde Homes Ltd [2074]	Support	The developers strongly welcome and support full review of existing employment allocations to identify any that could be released to housing.

<i>Section</i>		<i>Policy Introduction</i>	
		5.3.2	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27190	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	Employment Land allocations should be reviewed to ensure that the location and supply of allocated sites matches the market demand, including land outside the Urban Development Strategy Areas, but with good access to the A55.

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.3.6</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27191	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	Additional work is required to ensure that employment land is located in locations driven by market forces to ensure early take up and development.

<i>Section</i>		<i>Policy Introduction</i>	
		5.3.7	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27192	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	Revised policy wording should consider allowing flexibility to allow market driven unallocated windfall employment sites to come forward outside Urban Development Strategy Areas (UDSA) and Rural Development Strategy Areas (RDSA) where they will address a specific need and comply with the thrust of other policies in the LDP.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.3.9</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27193	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	List of employment sites should be reviewed to include brownfield land and waste sites which have the necessary infrastructure to support employment uses. Policy MWS/7 supports the use of industrial land for waste management facilities due to the compatible nature of built waste facilities and it is suggested that Policies EMP/3,4 and 5 should contain reciprocal wording to allow waste sites to be developed for employment uses provided that this would not result in a shortfall in the required number of waste management facilities.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.3.10</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27178	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	Welcome an early review of EMP6 as it has also caused unintended hardships and trapped people when its now shown that the LDP shows no demands for employment for B1. How was such a policy allowed to be applied one wonders if the evidence did not exist but a residential need was there under HOU1/2.

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.3.16</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27177	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	Welcome the review of EMP4 as I am its arch critic. It has been excessively used as a blunt object to harm local small business on some assumption that doing nothing is better than helping our own local business people consolidate, move or diversify. The B class is quite out of date with modern e trading and commerce outwith the public sector who still have B1 uses.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.3.19 Regional Growth Drivers</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27249	Macbryde Homes Ltd [2074]	Object	<p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board. The latter aspiration for 120000 new job opportunities in north Wales to 2035, associated Growth Bid activities. Regional Growth aspiration clearly points towards a requirement for significant additional housing to support employment and job creation. The Conwy Economic Strategy 2017-2027 seek to deliver 3500 new jobs to the County - a significantly higher number than the current LDP.</p> <p><i>Change To Plan Sought:</i></p> <p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board.</p>
27213	Anwyl Construction Ltd [2038]	Object	<p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board. The latter aspiration for 120000 new job opportunities in north Wales to 2035, associated Growth Bid activities. Regional Growth aspiration clearly points towards a requirement for significant additional housing to support employment and job creation. The Conwy Economic Strategy 2017-2027 seek to deliver 3500 new jobs to the County - a significantly higher number than the current LDP.</p> <p><i>Change To Plan Sought:</i></p> <p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board.</p>
27231	Beech Developments (NW) Ltd [765]	Object	<p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board. The latter aspiration for 120000 new job opportunities in north Wales to 2035, associated Growth Bid activities. Regional Growth aspiration clearly points towards a requirement for significant additional housing to support employment and job creation. The Conwy Economic Strategy 2017-2027 seek to deliver 3500 new jobs to the County - a significantly higher number than the current LDP.</p> <p><i>Change To Plan Sought:</i></p> <p>The Review should reflect on the requirement for General Conformity with the emerging National Development Framework for Wales, the potential for a North Wales Strategic Development Plan and take full account of the vision of the North Wales Economic Ambition Board.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.4.6</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27183	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Comment	<p>I consider that you now need a proper land policy for agriculture and diversification post leaving the EU in 2018.</p> <p>I suggest taking the views of CLA/NFU/ FUW as recent decisions locally show a lack of town planning recognition and indeed positivity or sensitivity to the sector, how it is changing, the effects for land use and rural areas and economic survival.</p> <p><i>Change To Plan Sought:</i></p> <p>Agro forestry etc needs consideration as well as on farm tourism.as a backstop during decoupling from subsidy.</p> <p>More flexible options need to be built into the LDP review and this is timely and I suggest it be put in place next.</p>

<i>Section Policy Introduction</i>			
<i>5.4.7 Emerging Conwy Employment Land Review 2017</i>			
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27194	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Object	Policy TOU/2 limits new tourism and recreational development to UDSA and RDSA. Review should be more comprehensive to give a greater degree of flexibility to deliver appropriate tourism and recreation developments outside of these areas.
	<i>Change To Plan Sought:</i>		Review should be more comprehensive to give a greater degree of flexibility to deliver appropriate tourism and recreation developments outside of these areas.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.4.9</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27195	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	We support a review of policy TOU/3 and it should be revised to promote new sustainable holiday accommodation outside the Holiday Accommodation Zones in Llandudno. This would widen the tourism offer within Conwy and promote the wider distribution of tourism income across the County.

<i>Section Policy Introduction</i>			
<i>5.4.10 Chalet, Caravan and Camping Sites</i>			
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27176	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	Welcome a review on this item too as the tourism sector is diversifying as quick as the LDP review.
	<i>Change To Plan Sought:</i>		The policy needs to be more clear on pods and huts (eg not counting them as caravans which they are not or stop sites other than working farms from having rural pods or huts which is quite unfair). I see the need to sharpen up the words on extensions to existing caravan sites to allow no new caravans on green fields at all under any circumstance. Only existing caravan sites to benefit in future. Also, no ratcheting of caravans for chalets to be allowed at all on existing sites other than lodges for caravans.
27196	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	We support a review of Policy TOU/4 'Chalet, Caravan and Camping Sites' to promote 'alternative camping' and suggest that eco lodges should be included in the list along with yurts, pods and shepherds huts.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.5.1 Retail</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27182	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Comment	Retail is altering radically with e retail so the Council must consider if most of its primary retail areas will survive the next 5 yrs unscathed and if B8 use are largely unrequired.
	<i>Change To Plan Sought:</i>		Retail park land allocations may also require review as these patterns fragment.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.5.7 Open Space</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27174	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Object	<p>Open space allocations seem to be out of step with the LDP evidence with some areas having unchanged major shortfalls of open space for the LDP period.</p> <p>Housing allocation led growth has not occurred to try and meet with some of this strategic shortfall. The council must allocate land and deal with these deficits itself next rather than rely on others to do it for them. I am also concerned to hear of rumours to build cheap homes on allotment land which favours RSAs.</p> <p><i>Change To Plan Sought:</i></p> <p>I believe that loophole requires plugging in the LDP and I shall be asking for a policy on that. If others cannot build on open space no one else should either, unless the LDP Policy is rewritten to properly reflect the Ministerial 2017 statement on open space in Wales from Fields In Trust. At present the open space policy wording is not in compliance with WAG policy.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.6.1</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27184	Natural Resources Wales (Planning Consultations) [5880]	Support	We have read the Review Report and note the proposed amendments to the replacement LDP with respect to the Natural Environment, Minerals and Waste. We welcome the future consultations with regards to the proposed schedule of works for the replacement LDP.
27181	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Object	Flooding policies require review for the coast after NRW has lowered its thresholds and has stated it is not intending to invest in coast defences thereby prejudicing development and land uses in Conwy.
	<i>Change To Plan Sought:</i>		The implications for no go areas need to be mapped again.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.6.14</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27173	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Object	<p>The use of the word poor design is not well chosen when we see examples of out of scale public buildings out of context being approved for use by the public sector but not in the private sector locally. The problem has been of the Council being unable to articulate its design ambitions when asked leading to uncertainty.</p> <p><i>Change To Plan Sought:</i></p> <p>If a policy is tacked on which deals with architecture and landscape architecture then that may be of more use than using words such as poor design which is plainly reliant on no objective assessments most of the time and no level playing field applied. This also applies to heritage assessments that also lack rigour under the new system.</p>

<i>Section</i>	<i>Policy Introduction</i>		
	<i>5.6.15 Green Wedges</i>		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27175	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	Welcome the review on this item.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.6.16 Sustainable Drainage Systems</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27262	CCBC (Mr Dyfed Rowlands) [6156]	Comment	<p>SuDS policy NTE/8 needs to be updated to fully align with Welsh Government SuDS Standards. These standards are likely to become statutory in 2018 with the introduction of SuDS Approval Boards (SAB). While current policy NTE/8 (if enforced correctly - which is often not the case) matches the standards in most regards the primary requirement for maximising rainwater harvesting is not reflected in NTE/8.</p> <p><i>Change To Plan Sought:</i></p> <p>The policy should highlight the cost benefits for developers in implementing compliant drainage as well as the links to meeting other policy requirements eg: Water conservation through rainwater harvesting Use of areas required to meet open space requirements for surface SuDS Opportunities to improve biodiversity and landscape</p>

<i>Section Policy Introduction</i>			
<i>5.7.16 Welsh language - implications for LDP Review</i>			
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27180	Town and Country Planning Services (Conwy) (Mr K Evans) [2030]	Support	<p>I have read the ideas about the Welsh Language policies and welcome moves to focus assessments for development types that matter.</p> <p>I think in future WLIA locally needs to focus more on housebuilding of 25plus on greenfields with a special emphasis on the 40 plus house scheme. It also needs to deal with school closures and loss of public transport links and public services in future, not shops. As regards mapping linguistic areas at risk I remain to be convinced that will reverse years of public policies which have undone their special fabric and would not add to controversy.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.9.1 Policy performance</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27185	Natural Resources Wales (Planning Consultations) [5880]	Support	We have read the Review Report and note the proposed amendments to the replacement LDP with respect to the Natural Environment, Minerals and Waste. We welcome the future consultations with regards to the proposed schedule of works for the replacement LDP.

<i>Section</i>		<i>Policy Introduction</i>	
		5.9.2	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27197	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Object	<p>Whilst policy MWS/3 for safeguarding mineral reserves remains relevant the areas shown on the Proposals Map need to be comprehensively reviewed to ensure internal consistency with Policy MWS/4 and MTAN 1 in terms of buffer zones. For example, a number of areas within and adjacent to Llanddulas Quarry could not be quarried due to residential property within the 200m and 100m buffers for hard rock and sand and gravel respectively, promoted in MTAN 1 and MWS/4. As such these and similar areas should be removed from the safeguarded minerals areas so as not to preclude alternative developments at these locations.</p> <p><i>Change To Plan Sought:</i></p> <p>Whilst policy MWS/3 for safeguarding mineral reserves remains relevant the areas shown on the Proposals Map need to be comprehensively reviewed to ensure internal consistency with Policy MWS/4 and MTAN 1 in terms of buffer zones.</p>

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.9.5</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27198	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Support	We support a call for additional waste sites/quotas as part of employment land allocations, but consider that safeguarding of waste sites solely for waste uses is no longer necessary given that Policy MWS/7 supports the use of other industrial land for waste management facilities and National policy now requires LPAs to consider waste as part of an employment land review. Allocation of sites solely for Waste Management has not delivered facilities at these locations and reviewing policy to allow greater flexibility for the market to deliver waste and employment sites where they are best suited should be considered.

<i>Section</i>		<i>Policy Introduction</i>	
		<i>5.9.7</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27199	FCC Environmental (UK) Limited (Mr David Molland) [6155]	Object	<p>Policy MWS/8 is considered too restrictive. NRW guidance and reasoned justification to Policy MWS/8 implies that for development with 250m of a landfill the EHO and NRW must be consulted. This would imply that individual applications located within the landfill buffer zone will be assessed on their merits based on a risk based assessment.</p> <p><i>Change To Plan Sought:</i> It is suggested that the policy is reworded to make it explicit that development within the zone would be allowed subject to a risk based assessment. For closed landfills this should be focussed on potential for gas migration, as other amenity issues and avoiding potential constraints on landfill operators would no longer be relevant.</p>

<i>Section</i>	<i>Joint Plans</i>		
	7.1		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27242	Macbryde Homes Ltd [2074]	Comment	<p>The developers note the Written Statement of the Cabinet Secretary of 14 December 2017 inviting Conwy and Denbighshire to submit proposals to prepare a Joint LDP. The developers agree with the Cabinet Secretary that the cost and time taken to prepare LDP's to date is excessive and that resources should be used efficiently.</p> <p>However, the Statement of 14 December 2017 is likely to lead to additional delay and uncertainty in the immediate future and a lengthened Development Planning process yet again.</p> <p><i>Change To Plan Sought:</i></p> <p>Notwithstanding that the current LDP would remain in force until formally replaced, the developers have very serious concerns that the current unsatisfactory housing land supply position in the County will, as a consequence of additional delay, only worsen. Delay increases uncertainty, risks much needed investment and fundamentally is likely to prevent the delivery of market and affordable homes which are very much needed in the County in the short term. Unless resolved quickly this could lead to the unsatisfactory situation of planning by appeal.</p>
27206	Anwyl Construction Ltd [2038]	Comment	<p>The developers note the Written Statement of the Cabinet Secretary of 14 December 2017 inviting Conwy and Denbighshire to submit proposals to prepare a Joint LDP. The developers agree with the Cabinet Secretary that the cost and time taken to prepare LDP's to date is excessive and that resources should be used efficiently.</p> <p>However, the Statement of 14 December 2017 is likely to lead to additional delay and uncertainty in the immediate future and a lengthened Development Planning process yet again</p> <p><i>Change To Plan Sought:</i></p> <p>Notwithstanding that the current LDP would remain in force until formally replaced, the developers have very serious concerns that the current unsatisfactory housing land supply position in the County will, as a consequence of additional delay, only worsen. Delay increases uncertainty, risks much needed investment and fundamentally is likely to prevent the delivery of market and affordable homes which are very much needed in the County in the short term. Unless resolved quickly this could lead to the unsatisfactory situation of planning by appeal.</p>

<i>Section</i>		<i>Joint Plans</i>	
		<i>7.1</i>	
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27224	Beech Developments (NW) Ltd [765]	Comment	<p>The developers note the Written Statement of the Cabinet Secretary of 14 December 2017 inviting Conwy and Denbighshire to submit proposals to prepare a Joint LDP. The developers agree with the Cabinet Secretary that the cost and time taken to prepare LDP's to date is excessive and that resources should be used efficiently.</p> <p>However, the Statement of 14 December 2017 is likely to lead to additional delay and uncertainty in the immediate future and a lengthened Development Planning process yet again.</p> <p><i>Change To Plan Sought:</i></p> <p>Notwithstanding that the current LDP would remain in force until formally replaced, the developers have very serious concerns that the current unsatisfactory housing land supply position in the County will, as a consequence of additional delay, only worsen. Delay increases uncertainty, risks much needed investment and fundamentally is likely to prevent the delivery of market and affordable homes which are very much needed in the County in the short term. Unless resolved quickly this could lead to the unsatisfactory situation of planning by appeal.</p>
27205	Welsh Assembly Government (Mr Mark Newey) [2176]	Object	<p>In light of the recent Written Statement inviting Local Authorities to consider the merits of preparing Joint LDPs and the letter from Lesley Griffiths AM, Cabinet Secretary for Energy, Planning and Rural Affairs (13 December 2017) specific to your Local Authority, I wish to draw to your attention to the need to provide a robust analysis of the benefits of preparing a Joint LDP.</p> <p>Whilst I note that you already undertake a large degree of joint working on the evidence base transcending administrative boundaries, it is not clear as to why this cannot be translated into a Joint LDP?</p> <p><i>Change To Plan Sought:</i></p> <p>I currently consider your RR inadequate regarding the evidence to support progressing a replacement LDP on an individual basis. There are extremely strong arguments for preparing a Joint LDP, as set out in the Cabinet Secretary for Energy, Planning and Rural Affairs letter (13 December 2017 refers). These matters need to be addressed thoroughly by the RR.</p>

<i>Section</i>	<i>Joint Plans</i>		
	7.6		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27240	Beech Developments (NW) Ltd [765]	Object	TAN1 is not the reason why the plan must be reviewed. TAN1 provides the nationally accepted measure of genuinely available housing land and performance against the plan. This paragraph should be reworded to acknowledge that housing land supply is constrained by a number of factors. It should also address the likely requirement for a Joint LDP with Denbighshire. <i>Change To Plan Sought:</i> TAN1 is not the reason why the plan must be reviewed.
27222	Anwyl Construction Ltd [2038]	Object	TAN1 is not the reason why the plan must be reviewed. TAN1 provides the nationally accepted measure of genuinely available housing land and performance against the plan. This paragraph should be reworded to acknowledge that housing land supply is constrained by a number of factors. It should also address the likely requirement for a Joint LDP with Denbighshire. <i>Change To Plan Sought:</i> TAN1 is not the reason why the plan must be reviewed.
27258	Macbryde Homes Ltd [2074]	Object	TAN1 is not the reason why the plan must be reviewed. TAN1 provides the nationally accepted measure of genuinely available housing land and performance against the plan. This paragraph should be reworded to acknowledge that housing land supply is constrained by a number of factors. It should also address the likely requirement for a Joint LDP with Denbighshire. <i>Change To Plan Sought:</i> TAN1 is not the reason why the plan must be reviewed.
27168	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	The HBF objects to some of the wording as it is wrong to say that it is the changes to TAN1 which have caused the under delivery of new homes, TAN1 is only a way of measuring the genuinely available land, it does not have an impact on the actual delivery of homes. Additional wording is required in light of the Ministers recent statement regarding LDP's and the need for them to move forward jointly. <i>Change To Plan Sought:</i> This paragraph should be reworded.

<i>Section</i>	<i>Conclusion</i>		
	8.1		
<i>Rep No</i>	<i>Name</i>	<i>Type</i>	<i>Representation Summary</i>
27241	Beech Developments (NW) Ltd [765]	Object	<p>The developers object to the conclusion that the way to measure and demonstrate improved performance in delivering homes is to seek fewer at the outside. Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need. The plan must not set housing need at a low level just to allow for the numbers to be delivered.</p> <p><i>Change To Plan Sought:</i> Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need.</p>
27223	Anwyl Construction Ltd [2038]	Object	<p>The developers object to the conclusion that the way to measure and demonstrate improved performance in delivering homes is to seek fewer at the outside. Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need. The plan must not set housing need at a low level just to allow for the numbers to be delivered.</p> <p><i>Change To Plan Sought:</i> Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need.</p>
27169	Home Builders Federation Ltd (Mr Mark Harris) [6080]	Object	<p>HBF object to the suggestion that the housing number should be reduced to a level which will ensure delivery, as this would be contrary to national guidance. The housing level should be set as a result of the identified need and any additional aspiration for growth which the Council may identify. Ensuring the right sites are allocated and that they are deliverable taking account of the impact of the plans policies is the issue.</p> <p><i>Change To Plan Sought:</i> Amend the wording to make it clearer the way in which housing numbers are set taking account of need and aspirations for economic growth.</p>
27259	Macbryde Homes Ltd [2074]	Object	<p>The developers object to the conclusion that the way to measure and demonstrate improved performance in delivering homes is to seek fewer at the outside. Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need. The plan must not set housing need at a low level just to allow for the numbers to be delivered.</p> <p><i>Change To Plan Sought:</i> Housing provision should be set taking account of the identified need as advised in PPW as well as providing for any economic or other aspirations linked to housing need.</p>

Section *Appendix 1 - AMR Performance Summary*
 9.1

Rep No	Name	Type	Representation Summary
27264	CCBC (Mr Dyfed Rowlands) [6156]	Comment	MI/0064 - With increasing guidance and understanding of SuDS over recent years ERF comments have increasingly identified failure to meet policy NTE/8 but without the corresponding enforcement of the policy. In the period since 2016 we are aware of numerous permissions being granted against advice on NTE/8 and would expect this to be an indicator that will be flagged as red during the next review. <i>Change To Plan Sought:</i> As the SAB, when implemented, will take over the surface water drainage approval role for all significant developments this indicator may become unnecessary, however, policy NTE/8 will still be relevant for single properties and should be updated as previously highlighted and enforced
27263	CCBC (Mr Dyfed Rowlands) [6156]	Comment	There is no indication of the criteria for green, amber, red status.

Section *Appendix 3 - Review of LDP Policy Effectiveness*

11.1

Rep No	Name	Type	Representation Summary
27265	CCBC (Mr Dyfed Rowlands) [6156]	Comment	NTE/8 - Since adoption of the LDP there has been new CIRIA SuDS Guidance, Welsh Government SuDS Standard and the upcoming commencement of Schedule 3 of the Flood & Water Management Act. NTE/8 is currently not enforced in order to function effectively and needs amendments to align with current best practice and policy as per our comments. There is potential to highlight how SuDS can contribute to CFS/11, CFS/13, NTE/3 & NTE/10
		<i>Change To Plan Sought:</i>	NTE/8 is currently not enforced in order to function effectively and needs amendments to align with current best practice and policy as per our comments. There is potential to highlight how SuDS can contribute to CFS/11, CFS/13, NTE/3 & NTE/10
