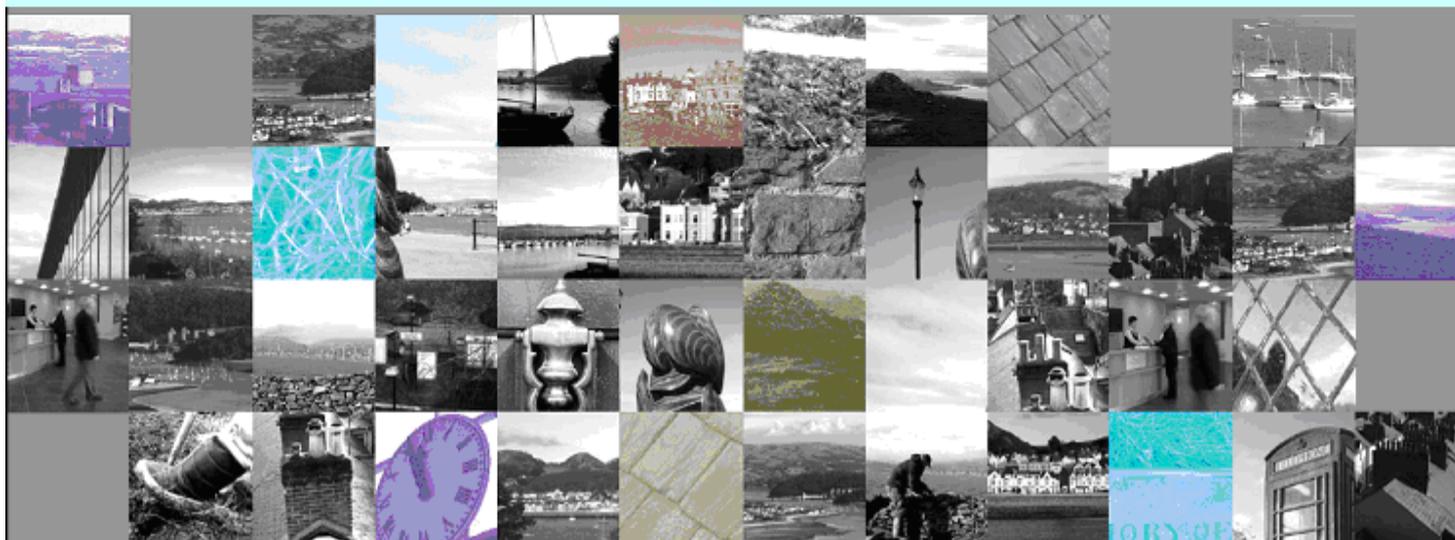


Conwy Deposit Local Development Plan 2007 – 2022 (Revised edition 2011)



REVISED BACKGROUND PAPER 10 – SUBMISSION

Sustainable Appraisal/Strategic Environmental Assessment

August 2012

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Conwy County Borough Council Deposit Local Development Plan

Sustainability Report
including Focused Changes

August 2012



NON-TECHNICAL SUMMARY

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1 Non-technical summary - Introduction

- 1.1 This report is the non-technical summary of the combined sustainability appraisal (SA) and strategic environmental assessment, of the Deposit version of the Conwy County Borough Council Local Development Plan (LDP). The main SA report shows the appraisal findings in full, including focused changes to the LDP prior to Examination.
- 1.2 This non-technical summary intended to provide an overview of the findings of the appraisal, with more detail of the process and outputs included in main report.
- 1.3 The main purpose of carrying out an SA is to assess what the impacts of development proposed in the LDP might be on the economy, the environment and society. Where potential negative effects are identified the SA then makes recommendations for how the LDP can be modified, or controls put on development, to avoid or mitigate against these. This is part of a process where successive stages of the emerging LDP are appraised and findings fed into the next stage of plan preparation.
- 1.4 The full SA report is a public document and its purpose is to show how the sustainability considerations are integrated into preparing the LDP. The SA report is also intended to allow readers of the plan an idea of how effective the LDP might be in delivering more sustainable development, and where there might be adverse impacts.

2 Sustainability appraisal stages

- 2.1 The SA is a process that continues throughout the preparation of the LDP. So far, the appraisal has included several stages and reports. These demonstrate the feedback process between plan making and the sustainability appraisal, allowing sustainability considerations to be integrated into the LDP during preparation.
- 2.2 The SA reports from earlier stages of appraisal are available on the Conwy Borough Council website.

Scoping Report

- 2.3 Part of the statutory requirements for a strategic environmental assessment is to consult with named organisations on what issues the assessment should cover. This is set out in a 'scoping report', an essential first step in appraisal, it includes:
 - a characterisation of the sustainability baseline of the County Borough, to identify key sustainability issues that should be addressed in the LDP
 - a review of other plans and programmes covering the County Borough that may influence SA and LDP

- a set of sustainability objectives to define sustainable development for the SA
- an outline of the proposed methodology for SA.

2.4 Responses from the consultees were taken into account in moving forward with the SA.

SA of the options report and initial preferred strategy

2.5 This stage the sustainability appraisal considered the alternative levels of housing and employment for the LDP. The SA also assessed the proposed options for distributing this development around the plan area, to identify the sustainability implications of these alternatives.

SA of the Preferred Strategy

2.6 The SA at this stage assessed the sustainability implications of the full preferred strategy version of the LPD. This included an appraisal of the chosen growth option and distribution of development.

SA of the Deposit LDP (April 2009, 2011 and 2012)

2.7 The SA at these stages assessed the sustainability implications of full Deposit versions of the LPD. However, following the 2009 consultation process it was decided to revise the Deposit and therefore the SA. The 2011 SA report was largely the same as was prepared in 2009, although takes into account the changes. This stage of the SA updates the 2011 report in light of Focused Changes made to the LDP. Findings and recommendations of the SA are updated to take into account sustainability impacts of these changes.

3 The sustainability objectives

3.1 A set of sustainability objectives have been developed for the SA. These objectives are based on agreed national definitions of sustainable development, but adapted using the information gathered at scoping to tailor them to the needs of the appraisal of the Conwy LDP. They cover a range of sustainable issues related to the protection of the environment and natural resource, the economy and society.

3.2 The purpose of the objectives is to provide a consistent definition of sustainable development for the SA process. The emerging objectives, policies and proposals of the LDP can then be tested against them as part of a process of systematic appraisal. Table 1 shows the sustainability objectives.

Table 1: Sustainability objectives for the SA of the Conwy LDP

Concern	Sustainability objective
Social progress which recognises the needs of everyone	
Access to services	Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation
Community and culture	Maintain and enhance community cohesion and identity
Health and well-being	<ul style="list-style-type: none"> • Provide a clean, healthy and safe environment for all
Housing	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs
Effective Protection of the Environment	
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area
Landscape character	<ul style="list-style-type: none"> • Ensure special and distinctive, semi-natural and historic landscapes and their specific features are conserved and enhanced
Built environment	<ul style="list-style-type: none"> • Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards
Cultural heritage	<ul style="list-style-type: none"> • Conserve and enhance the built and archaeological cultural heritage features of the area
Prudent use of natural resources	
Energy	<ul style="list-style-type: none"> • Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources
Land	<ul style="list-style-type: none"> • Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant
Water	<ul style="list-style-type: none"> • Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding
Air and Atmosphere	<ul style="list-style-type: none"> • Reduce all forms of air pollution locally and globally improve the atmosphere
Minerals and primary resources	<ul style="list-style-type: none"> • Safeguard non-renewable resources and promote reuse of primary resources
Maintenance of high and stable levels of economic growth and employment	
Economic diversification	<ul style="list-style-type: none"> • Encourage diversification of the economic base in rural and urban areas
Employment access	<ul style="list-style-type: none"> • Ensure that there is good access for all to employment
Encouraging investment	<ul style="list-style-type: none"> • Emphasise and increase factors conducive to wealth creation and attractiveness to investors

4 Sustainability appraisal of the growth options

- 4.1 An important part of any SA is considering how alternative ways of delivering development area could lead to different impacts for delivering sustainable development.
- 4.2 As shown in paragraphs 2.5 and 2.6, prior to this stage of the SA the appraisal process assessed the relative impacts on sustainability of alternative ways of delivering growth and distributing development. New options were presented for growth at this Deposit stage.
- 4.3 The appraisal identified that the chosen housing growth option was relatively low, based on the need for more houses simply to accommodate the existing population. As more people live alone and live longer so the number of people in each home is gradually decreasing pushing up demand. Therefore, the level of growth is almost as small as is possible to help provide homes to meet the needs of existing residents, natural population change, and meet some of the inevitable demand from people moving into the area whatever reason.
- 4.4 The SA notes that pursuing higher levels of growth may have more impacts on the natural environment, through the need for more land. However, it could also have benefits for the communities of the County Borough by helping to provide more affordable homes, and help more young people remain in the area and perhaps support better economic growth. However, how effectively this is achieved would rely on option chosen for the spatial distribution of growth. To support successful rural communities would mean more housing to rural villages, with the potential for negative impacts related to the LDP objective of reducing the need to travel.
- 4.5 The growth options have been revised from the 2011 Deposit LDP, with housing growth level reduced to 6,350 dwellings, with a contingency to take total housing growth to 6,985 dwellings. A higher housing growth level had been chosen of 6,800, with a contingency to take total housing growth to 7,900. The sustainability appraisal does identify some potential sustainability implications of the lower growth rate. These implications are that lower growth:
- may not be able to meet affordable housing needs
 - may not be high enough to deliver the workforce necessary to achieve economic growth objectives, and therefore may encourage commuting.
- 4.6 The appraisal of the strategy for distributing development around the County Borough shows that the chosen approach likely to lead to similar patterns of development to what already exists. The focus on the coastal towns is likely to help support these communities, with more development supporting more accessible services, and therefore helping to reduce the need to travel.

5 A sustainable spatial strategy

- 5.1 Creating a sustainable strategy is an essential part of creating a sustainable LDP. 'Frontloading' of the plan to have a sustainable spatial strategy should mean that the rest of the plan could simply follow this in order to deliver sustainability development in the plan area. Using development control policies to fine-tune the deliver and get the most out of development.
- 5.2 One of the principle roles of a spatial strategy is to deliver more sustainable development by reducing reliance on car travel. This can be done through supporting public transport improvements, walking, and cycling routes. However, more important than this a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place.
- 5.3 The spatial strategy has an essential role in distributing development and therefore shaping the future shape of the towns and villages. It needs to look for ways to provide a mix of different land uses, such as homes, jobs and services, which people can access without getting in their car. The strategy needs to link where people live to where they work. Everyday commuting creates a large number of unsustainable car trips and often puts those who cannot travel by car at a disadvantage.
- 5.4 Reducing travel can have some major sustainability benefits. These include:
- reducing emission to air, with benefits for local air quality and helping mitigate against climate change
 - lowering Conwy's contribution to climate change
 - reducing congestion can be beneficial for the economy
 - health benefits, from reduced air pollution and reducing adverse impacts on wellbeing of congested roads
 - social benefits, as more people have equitable access to jobs and services where the priority is not on people who can or choose to travel by car.
- 5.5 In principle, the strategy of the LDP is compatible with this approach to creating a sustainable spatial strategy. The strategy focuses the majority of development in the 'Urban Development Strategy Area' and should help promote more sustainable patterns of development, reducing the need to travel.
- 5.6 In addition, permitting a proportion of development in the rural area can help support vibrant and viable rural communities, through the provision of new affordable homes for local people and new rural enterprise. It may be that additional information on the existing and potential roles of rural villages may have identified some that have the capacity to accommodate a higher level of growth. This could help support a strong local economy and provide a focus for a rural hinterland.

- 5.7 The spatial distribution of development is supported by a policy that requires all sites to deliver a high proportion affordable house for local needs. This could have benefits in helping reverse the decline of rural communities and making sure young people can afford to remain in Conwy. However, the SA does note the need to make sure housing is coming forward for development to meet identified affordable housing requirements. With only 6,350 new homes to be built the target of 30% affordable homes for all new development needs to be rigorously applied to achieve this.
- 5.8 The SA also queries the basis on which housing and employment has been distributed within the Urban Development Strategy Area. The LDP provides little certainty that this is based on meeting the specific needs of different areas. The SA identifies that the distribution of development may be based on site availability, rather than any strategic plan for each town or functional group of towns.
- 5.9 This means the strategy may not be making the best of the opportunities presented by new development. For instance:
- further reducing the need to travel in the coastal area by creating greater self-containment in each town, or functional groups of towns, by balancing levels of jobs and homes, or
 - using growth to stimulate regeneration of towns and support of local services.
- 5.10 The SA does recognise that the spatial strategy in Conwy is restricted in what it can achieve by the quantity of existing housing expected from sites that:
- are committed for housing development and have already been through the planning process
 - houses that have already been built since the start of the plan period
 - houses that are predicated to be developed on sites that are currently unidentified and are not allocated, known as 'windfall'.
- 5.11 The SA also notes that there is not a great deal of difference between the amount of housing is anticipated to be delivered on 'windfall' sites as on allocated housing sites. The SA suggests that, to make sure that these sites come forward in line with the spatial strategy, strategic policies need to be carefully worded to show where development will and will not be permitted, and the scale of development suitable in different towns and villages.

6 Sustainability appraisal of policies

- 6.1 The SA assessed the content of the policies of the LDP. This considered how these policies are likely to contribute to sustainable development as well as recommendations on how they could be improved.
- 6.2 **Principles determining the location of development:** These policies include the main strategy for development, the sustainability of which is part

of the spatial strategy SA. Other policies are positive for delivering more sustainable development, and include the principles of good design and sustainable development. The SA recommends some changes to policy and text of avoid duplicating other sections of the LDP.

- 6.3 **Housing strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The policies on housing should help deliver sustainable development objectives related to social sustainability. For instance, the affordable housing policy could help to support sustainable rural communities.
- 6.4 The SA also makes some recommendations on possible changes to help deliver more sustainable development, including:
- housing densities should be maximised to make best use of accessible locations and land
 - some clarification may be need in the policy on Gypsy, Traveller and Travelling Showpeople sites to make sure these are allocated and determined based on the diverse needs of each community.
- 6.5 The SA also reviewed the housing allocations made in the LDP, using the Council's appraisal of sites as a basis. The Council's appraisal is useful in identifying potential constraints to development on the allocations. These should be followed up in the LDP by including a housing implementation that lists for each site the constraints and sensitivities and how developers will be expected to take these into account in the development proposals. This information is particularly important given the substantial revision of sites allocated for development between the 2009, 2010 and 2011 Deposit versions of the LDP.
- 6.6 **Mixed use development:** Other information that may help the reader get an understanding of the role of the LDP and the future of the County Borough is more site specific information about allocations. Several of the sites allocated for development are to be for a mix of uses.
- 6.7 To secure development that is sustainable as possible in these locations Development Briefs and / or specific policies could be included in the LDP. These would address the overall aim for the development or redevelopment of a site, including mix of uses, design guides, low carbon energy goals and access improvements.
- 6.8 **Contingency sites for housing:** The SA welcomes the inclusion of monitoring to release contingency sites. Greater certainty has been provided in background paper 41 (August 2012) of what the trigger points are for allowing these sites to be bought forward, although these should be outlined within the LDP itself. It is suggested that for sustainable development that these are only released in conjunction with meeting economic growth targets.

- 6.9 The SA also queried how decisions were made on the allocated sites being the most suitable. It is essential that the Council can justify that the choice of allocations are compatible with sustainable development objectives. This includes being able to demonstrate that development of these allocations would not result in harm to the natural and built environment, where comparable alternative sites are available.
- 6.10 **The economic strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The strategy includes permitting around 15% of new employment development in the rural area, the SA notes that this type of development should only be given permission where it is of a scale suitable to this location, to avoid creating unsustainable travel patterns. However, there may be benefits for rural communities of supporting rural enterprise.
- 6.11 The SA suggests to improve the clarity of the plan the split of the employment land requirements into 'predicted population change' and 'to reduce out-commuting' is removed. LDP policy, allocations and text do not appear to differentiate between what type or location of development these categories represent.
- 6.12 **Contingency sites for employment:** Managing the release of the additional 3.5 ha of employment land may be undermined by the policy that allows non-allocated sites on the urban periphery to be developed. If additional sites are allowed to come forward preventing the contingency sites may not be possible, with may undermine the chosen strategy.
- 6.13 **Tourism** is an essential part of the Conwy economy, the SA suggests some changes to tourism policies to help make sure they help deliver high quality new development of this type and supporting existing tourism schemes.
- 6.14 **Community facilities and services:** The policies of this section should help support the delivery and protection of accessible facilities and services, essential for viable communities. Policies include supporting retailing and protecting shops from inappropriate change of use, protecting and allocating allotment sites, and delivering new open space in development.
- 6.15 However, the SA makes some recommendations where improvements could be made to policies to help sustainability performance:
- Retail policy could include a strategic sequential approach to delivering this type of development, favouring town centres, to help reduce car travel and out-of-town retailing that can adversely impact on viability of town and village shops.
 - Policies allowing some change of use in shopping centres may help ensure vacant units do not harm the character of these areas. However, it may be suitable to state which types of uses will and will not be permitted to help make sure these areas remain primarily for shopping.

- 6.16 **The natural environment:** Protecting, and improving where possible, the natural environment is essential in securing the sustainable delivery of development. However, the SA makes some recommendations where improvements could be made to policy:
- Referring to nationally and internationally protected sites may be suitable in policy. This should not repeat national policies but could reflect on the implications of these designations on the local area, e.g. views to and from Snowdonia national park, and reference to the internationally designated nature conservation sites in Conwy, particularly as allocated development is in close proximity to some of these sites
 - in securing renewable energy as part of development, it may be suitable for the LDP set requirements for larger sites to consider viability of combined heat and power.
 - a flood risk policy could be included in the LDP to help avoid vulnerable development being put in areas of unsuitable flood risk.
- 6.17 **Cultural heritage:** Conwy contains areas characterised by high quality built historic and cultural heritage. The policies in this section should help in the protection of this, although some changes could be made to improve their clarity.
- 6.18 **Sustainable transport strategy:** The LDP includes policies to help deliver an improved transport network in Conwy. This includes protecting land for public transport, walking and cycling routes, these are essential to help secure a modal shift away from car use, and therefore reduce environmental and health impacts and support equitable access. The policies of the LDP include safeguarding land for new road development. The SA identifies new roads do not perform well in helping achieve more sustainable development. Despite some initial economic benefits from reduced congestion roads will have inevitable longer term negative impacts people and the environment.
- 6.19 **Minerals and waste:** The minerals policies clearly set out that no new hard rock quarries will be permitted in Conwy, although the operation of existing quarries should be protected. This will help reduce the potential impacts of quarrying on people and the environment in the plan area. However, the SA notes that if the long-term demand for hard rock does not decrease, protecting the local environment could simply displace the impacts of quarrying elsewhere nationally or globally. This may also have an increased need for long distance transportation of rock, contrary to principles of sustainability. Policies on safeguarding sand and gravel sites should help reserve this mineral resource for future use.
- 6.20 The LDP lists the type of waste facility that could be developed in the plan area and possible locations. However, to aid delivery of these sites in the short-term, and help deliver more sustainable waste management, it would be better to allocate specific sites and uses through the LDP. Relying on a planning application process to determine sites is likely to be a slower

process, particularly if the waste management type is perceived as a risk to health, such as windrow composting or energy recovery.

General comment

- 6.21 To make an LDP that can successfully deliver sustainable development it needs to be easily understood.
- 6.22 Many different types of people will need to make use of the LDP, from householders, planning professionals, interest groups and the planning authorities. This means an LDP that is easier to use should lead to better planning applications and more consistent decision making, resulting in the more successful implementation of sustainable development.
- 6.23 For this reason, the SA makes some general suggestions on changes to the LDP to benefit the clarity and usability of the document.
- 6.24 The LDP is currently quite long and shortening it could make it easier to understand and use. This could include:
- removing some of the repetition in the introduction, strategy and 'reasoned justification' of strategic policies
 - limiting policies to those that directly set development control criteria, in line with current Welsh Assembly Government.
- 6.25 A separation of the 'spatial strategy' text and policies from the development control policies could also help improve the legibility of the LDP. The spatial strategy would set the framework against which all development proposals are tested, with development control policies used to make sure the sustainability benefits of all new development are maximised and adverse impacts avoided.

1 Introduction

- 1.1 The primary task of this document is to report the findings of the ongoing Sustainability Appraisal (SA) of the emerging Local Development Plan being prepared by Conwy County Borough Council.
- 1.2 This SA is a process that includes assessing the sustainability implications of implementing the Local Development Plan (LDP). This will need to look at all aspects of the plan, from the generation of growth and spatial development options to the detailed assessment of policies and proposals for implementation.
- 1.3 The purpose of the SA has been to inform the decision making process during preparation of the Local Development Plan (LDP). This is in order to ensure that potential sustainable development implications of the LDP strategy are identified, and recognised in the choices made by Conwy County Borough Council. It is also the role of SA to test the performance of the plan under review in order to help to determine whether it appears to be appropriate for the task intended. The SA method is in line with good practice on sustainability appraisal and the European Community Directive on Strategic Environmental Assessment (SEA).
- 1.4 Initial stages of the SA have also been undertaken, starting with the production of a Scoping Report, with the purpose of identifying approach the SA should take to the appraisal, and the matters that should be addressed in the SA. The Scoping Report was sent out to consultation with a select group of consultees, and their input has been incorporated into the SA. The SA report is available on the Conwy County Borough Council website.
- 1.5 Following scoping an appraisal of the options report and preferred strategy version LDD (March 2006) was undertaken. The SA report prepared at that time raised some concerns of potential negative impacts of implementing the proposed strategy. The SA report made recommendations of where amendments or clarifications to the strategy could help improve its performance in terms of achieving more sustainable development.
- 1.6 Subsequently, an SA of the preferred strategy LDP consultation draft was carried out. The stage of SA now reached is the appraisal of the 2010 Deposit version of the LDP, updated to take into account changes prior to Examination in Public. Two Deposit versions of the LDP have been produced by the Council. An initial version, prepared in 2009, was revoked following a need to review housing figures. This SA report follows closely the SA of the 2009 Deposit, updated to reflect the changes. - Background documents were produced by those preparing the LDP to indicate how the findings of the SA have, and will be taken on board in moving forward with the Strategy and preparation of the whole LDP¹.

¹ Conwy County Borough Council (28 June 2006) *Summary of Recommendations of the SA of the Conwy LDP Options Report and Preferred Strategy*

Content of the report

- 1.7 Section 2 of this report gives detail on the background to the LDP, and the SA process. This includes consideration of how the requirements of SEA will be incorporated into the appraisal process. In this section the progress on the SA to date is outlined, including the production of a scoping report, and consultation that was undertaken as part of this, as well as the next steps in the SA.
- 1.8 Section 3 considers other plans, programmes and strategies that are relevant to the LDP and the SA. Section 4 contains a brief characterisation of the baseline situation in the Conwy LDP area, identifying some key matters the LDP could address.
- 1.9 Section 5 contains the rationale behind the selection of the sustainability objectives used in the appraisal process.
- 1.10 Section 6 onwards contains the sustainability appraisal of the LDP and its vision, objectives, strategy, policies and allocations. Section 6 looks at the vision and objectives, section 9 the strategy and section 10 the policies. In addition, section 7 looks again at how option and alternative were considered for growth and distribution of development.
- 1.11 Section 8 includes general comments on how useable the LDP is, and if the way it is presented may actually make sure more sustainable development is implemented.
- 1.12 Section 10 summarises how the impacts of the plan on the environment, economy and society could be mitigated. Section 11 considers monitoring proposals for the SA combined with monitoring for the LDP.

2 Sustainability Appraisal and the development plan

- 2.1 Conwy County Borough Council is currently in the process of preparing the LDP for the County Borough of Conwy, which does not include the National Park. The SA is being undertaken alongside the preparation of the LDP, with the appraisal integral to the development of the LDP in terms of informing the process and the policy agenda. This is demonstrated by the stages of SA already complete, including an appraisal of initial options and strategy.
- 2.2 The SA is used to help formulate the LDP and considers the sustainability implications of the objectives, strategy and policies of the LDP. However, the Council does not have to follow the advice or recommendations of the appraisal, so long as the choices made can be justified.

Background to the Conwy LDP

- 2.3 Under the old development planning system for Wales Unitary Development Plans were to be produced for each authority. A UDP was never adopted in Conwy. The Council had started work on the UDP and it reached a deposit draft, however they decided not to proceed with completing the UDP, and instead move to the new planning system brought in under the Planning and Compulsory Purchase Act 2004 (PCP Act 2004). Conwy was one of the first authorities to decide to begin a plan under the new system.
- 2.4 The LDP will replace the plans that currently deliver development in the area, some of which are very outdated:
- Gwynedd Structure Plan 1993
 - Clwyd Structure Plan (second alteration) 1999
 - Llandudno Conwy District Plan 1982
 - Colwyn Borough Local Plan 1999
- 2.5 The Council has set out a programme for the preparation of the Conwy LDP and the following table shows the main stages in the plan-making process.

LDP Stage	
Consultation on the LDP Preferred Strategy	October/November 2006
Consultation on the Deposit LDP	April 2009
Consultation on revised Deposit LDP	February/March 2011
Examination in Public	February/March 2013
Adoption of the LDP	Summer 2013

LDP Stage	
Consultation on the LDP Preferred Strategy	October/November 2006
Consultation on the Deposit LDP	April 2009
Consultation on revised Deposit LDP	February/March 2011
Examination in Public	February/March 2013
Adoption of the LDP	Summer 2013

- 2.6 Throughout the process of the LDP preparation successive stages will be subject to SA. This is to ensure that where decisions have to be made on selection alternatives, setting objectives, creating policies and allocating proposals, these are based on a good understanding of the implications for sustainability.

The Sustainability Appraisal process

- 2.7 The purpose of this appraisal is to better inform decision makers on the sustainability aspects of the plan and ensure the implications of the plan on helping to achieve sustainable development are recognised. Planning consultants, Baker Associates who are now part of Peter Brett Associates, are carrying out SA as an independent exercise, with some input and provision of information from officers at Conwy County Borough Council.

Strategic Environmental Assessment and Sustainability Appraisal

- 2.8 An SA must be carried out in order to fulfil the statutory requirements from the PCP Act 2004. The SA is also being undertaken in such a way so as to meet the requirements of the European Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and Statutory Instrument 1656 (w.170) 'The Environmental Assessment of Plans and Programmes' Regulations, 2004. SEA and SA are being undertaken together as a combined process with a report common to both.
- 2.9 The requirements for SEA come directly from European legislation, and are set out in a Directive that is common to all of the Member States of the European Union. In Wales, the Directive has been transposed into Regulations, which represent legislation very similar in wording to the original Directive.
- 2.10 The Regulations came into force in July 2004, and require certain types of defined 'plan or programme' to undergo environmental assessment, to a strict set of environmental criteria that are included in Schedule 2 of the Regulations. Development plans are identified as one of the types of 'plan or programme' that must be assessed. However, as development plans in the form of LDP are already statutorily required to undergo SA Welsh Assembly Government decided

that the best way to proceed, following the commencement of the SEA Regulations, was to ensure the SA process complied with the very specific regulatory requirements of SEA.

- 2.11 The need for SA is reiterated in 'Local Development Plans Wales' WAG 2005, which makes clear reference to SA, including meeting the requirements of SEA. It also advocates an integrated approach to the two processes. In this appraisal SA is used to mean a combined SA and SEA approach.
- 2.12 The main divergence between the two processes is that for SEA completing very strict regulatory processes is required to comply with the Regulations. The process of SA is only set out through guidance, from various sources, and therefore more open to interpretation.
- 2.13 A further difference is that SEA is primarily concerned with environmental sustainability, whereas SA is concerned with the wider sustainability agenda, including social and economic implications. This widens the SEA process considerably, however it must be remembered that the way that economic and social implications are considered in SA is only set out as guidance, as they are not part of the SEA Regulations.
- 2.14 The principal purpose of SEA is to ensure that environmental issues are given sufficient weight, and are not secondary to social and economic ones. The importance is to ensure that the current emphasis in the UK of integrating environmental, social and economic considerations to find an outcome that benefits all three, or to decide between them, does not detract from the primary purpose of SEA. The key environmental issues, which are outlined in the Directive, include:
- Landscape
 - Flora, fauna, biodiversity
 - Climate change
 - Human health
 - Water
 - Soil
 - Population
 - Air
 - Cultural heritage.
- 2.15 When the SA process was started on this LDP there was no guidance in Wales covering the SA of LDPs, although there was existing guidance on the SA of UDPs, in 'Sustainability Appraisal of UDPs' (WAG 2002) and this includes a supplementary report on the interim guide for SEA of UDPs. In England ODPM produced guidance on 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks', (November 2005), there is also the generic document on applying SEA to Plans and Programmes (2005) developed jointly by ODPM, WAG the Scottish Executive and Northern Ireland Environment

Department. These sources of guidance together guided the early stages of the SA of the Conwy LDP.

- 2.16 Since those early SA stages the LDP Manual produced by WAG in 2006 contains guidance on how SA fits into LDP preparation. Stating that the SA:

‘should be an **integral element of every stage of LDP production** (not a ‘tick box’ activity ‘bolted on’ at the end of the process).’ (paragraph 2.3.1).

- 2.17 Therefore, the guidance given in this document will help guide the SA from this stage forth, although the approach put taken must also take a practical approach to ensuring the outputs of the SA are as useful as possible by ensuring the topics covered and process followed in the SA help in creating a better LDP.

SA of the emerging LDP

- 2.18 The SA of the emerging LDP is an iterative process with feedback between successive stages of appraisal and the production of LDP. This is so the potential sustainability implications of alternative decisions and options made in formulating the strategy are explicit, thereby allowing these considerations to be taken into account in making choices.

- 2.19 **Scoping:** The LDP has undergone the preliminary scoping stage in SA. This initial stage in the SA process was carried out in October/November 2005. This scoping stage is a requirement of the SEA process, although as this is a combined SEA/SA it was suitable to include sustainability issues as well as the environmental issues required under the Regulations.

- 2.20 The Scoping Report was sent out for comment to a select groups of consultees including the three statutory consultees for SEA, the Environment Agency, Countryside Council for Wales and Cadw. The document was also circulated for comment within the Council, and the LDP Advisory Panel was consulted. Responses were received from a variety of organisations, and where appropriate the comments were taken on board and incorporated into the SA process.

- 2.21 **SA of Options Report:** This stage in the SA process considered the options put forward in the Background Paper to the Preferred Strategy, ‘Options Report’. The intended outcome is an indication of what the relative sustainability implications of implementing different growth options for employment and housing. In addition, this stage looks at alternative strategic spatial alternatives for the distribution of this growth. The purpose of this is to inform decision makers on the suitability of proceeding with their preferred choice in light of the potential sustainability implications. The findings of this appraisal appear in section 6.

- 2.22 This appraisal of options has had to be repeated to take into account the changes because of different versions of the LDP. While the spatial options remain largely constant, with minor changes of how areas are defined, the growth options have changed substantially. Therefore, this April 2009 SA has reassessed potential impacts of growth options.

- 2.23 Considering alternatives in this way is a requirement of the SA, and particularly the SEA process. That requires 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' (paragraph 12(2)), are appraised and documented in the SA report.
- 2.24 This is reiterated through 'Local Development Plans Wales' (WAG 2005) which states that to be effective sustainability appraisal should be fully integrated in the plan making process and should provide input at each stage when decisions are taken. Paragraph 3.6 of the document makes clear that, 'alternative policies, proposals and locations for development should be evaluated wherever appropriate'.
- 2.25 **SA of the options and preferred strategy:** In March 2006 a sustainability appraisal the options and preferred strategy was undertaken. The intention is appraisal at this early stage of a draft of the preferred strategy informs the LDP preparation process, with the aim of producing a more sustainable plan.
- 2.26 **SA of the Preferred Strategy:** In June 2006, a sustainability appraisal of a further draft of the options and preferred strategy document was appraised. This report was consulted upon alongside this stage of the DPD. Again, the purpose of the report was to aid the Council in making a decision on the preferred option, based on the relative sustainability implications of each approach. The main recommendations of this report are included as Appendix 1. The full SA of the Preferred Strategy is available from the Council website.
- 2.27 The SA has influenced the emerging strategy to some extent, and the report produced by Conwy County Borough Council, for the LDP Task and Finish Group 28 June 2006 summarised the findings of the SA and showed how the plan making team would consider these in moving forward with the LDP.
- 2.28 A summary of the changes made to the plan because of this sustainability appraisal are included in Appendix 2.
- 2.29 Following this Preferred Strategy stage new options for growth were developed for the Deposit LDP. These have been briefly appraised in Section 7 of this report. However, they were not made available for SA prior to drawing up the full Deposit Strategy, so there has been no opportunity for the findings to influence policy.
- 2.30 **SA of the Deposit LDP (2009):** The report documents the comprehensive process SA of the whole LDP, including objectives, strategy and policies. Policy appraisal uses a matrix based approach, in addition to a full commentary on the sustainability of the plan and its implications on implementation.
- 2.31 The approach taken to documenting the SA includes the specific reporting requirements of SEA, but a wider scope of reporting to look beyond environmental matters, and considers social wellbeing and economic performance.
- 2.32 The aim of this stage of SA is to look at the general coverage of issues in the LDP to make sure matters of sustainability importance have been suitably addressed. To secure delivery of sustainable development, the SA looks at the strategy and

policies of the LDP and assesses how easy these will be to implement. As even where there can be clear good intent for sustainable development, policies that are difficult to implement can hinder delivery.

- 2.33 **SA of the Deposit LDP (2011):** The majority of content remained as it was in the 2009 version and the aim of the report is the same. However, the report has been updated to take into account revised content of the LDP. Where necessary the change this has meant from the previous version is set out in the text.
- 2.34 **Amendment of SA to take into Deposit LDP Focused Changes (2012):** This is the current version of the SA report. It is an amendment to the previous SA taking into account the Focused Changes to the LDP prepared prior to Examination in Public.

3 Other plans and strategies informing the Sustainability Appraisal

- 3.1 It is a requirement for Strategy Environmental Assessment to look at other plans and programmes that cover the same area as the LDP. The purpose is to identify those that the SA and the LDP should take into account in order to deliver sustainable development.
- 3.2 It is the nature of local planning that there are some additional and overlapping policies at various levels that must be taken into account in the LDP. This is in addition to legislative and procedural requirements from national and UK government. The LDP will need to help implement local policy objectives and deliver land use policy for Wales as well as take account the policies from national agencies and partner organisations.
- 3.3 Many other documents prepared by the local authority and others provide context for the LDP – in the form of objectives that the LDP should help to meet and complementary material – in the form of policies and programmes.
- 3.4 In addition to local level plans and strategies, a large amount of guidance on development planning comes from the Wales level, in the form of Planning Policy Wales and the Technical Advice Notes (TANs), and the Wales Spatial Plan.
- 3.5 It is important for the LDP and the SA alike to take on board the messages from these documents, taking a unified approach to the development of the plan area. Including these in the relevant sustainability framework objectives is the best way to take them into account in the SA (section 5).
- 3.6 The rest of this section sets out the main plans and guidance that will influence the LDP and those matters that should be addressed, to some extent, in considering what sustainable development objectives have been set for the area and how these may be met through the LDP.
- 3.7 It is important to note that these lists are not intended to be exhaustive, and simply identify those plans and programmes that have greatest relevance to the LDP and SP. This means that this summary of documents only looks for those that can be directly influenced by LDP policy approaches.

International policy

- 3.8 The SA takes into account policy set at an international level, both those set by the United Nations, such as the Kyoto Protocol, 1992 on climate change and the need to limit greenhouse gas emissions, as well as the environmental legislation from the European Commission, outlined below.
- 3.9 The EC Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna 92/43/EEC – considers the conservation of flora and fauna and on a network of protected areas in Europe, including special protection areas.

- 3.10 The Water Framework Directive 2000/60/EC – considers sustainable water use and water quality protection in river catchments (no plans in the UK have yet to be produced under this Directive).
- 3.11 The Air Quality Framework Directive 92/62/EC – seeks to control air pollution.
- 3.12 Various waste management Directives including the Landfill Directive 99/31/EC – seek the more sustainable management of waste, including setting targets for recycling rates of waste, with implications for general waste management policies.

United Kingdom policy

- 3.13 The United Kingdom ‘Biodiversity Action Plan’ (1994) is the overall action plan for habitat and species protection in the UK, this is translated to a local situation for Conwy, in the Species and Biodiversity Action Plans.
- 3.14 The United Kingdom ‘Waste Strategy’ (2000) sets a vision for the approach to waste management in the UK. It includes targets for reducing industrial and commercial waste to landfill to 85% of 1998 levels by 2005, and recycling 30% of household waste by 2010, therefore the LDP needs to be checked to ensure that it promotes the more efficient use of resources.
- 3.15 The ‘Air Quality Strategy for England, Scotland, Wales and Northern Ireland’ (2000), this includes the need to improve air quality and includes specific targets for this.
- 3.16 ‘A Better Quality of Life; A strategy for sustainable development in the United Kingdom’ (1999) and the updated strategy ‘Securing the Future’ (2005) set out the UK wide sustainable development agenda.

Wales policies and strategies

- 3.17 The key document ‘Planning Policy Wales’ outlines the principles and aspirations for planning policy of the Welsh Assembly Government (WAG). Originally published in 2002 but then revised in 2010 this document is a central consideration of the document is to promote sustainable development and three other strategic objectives: the economy, social disadvantage, and equal opportunities.
- 3.18 The way that the land use planning system can be used to contribute to these objectives is also discussed and thematic sections outlining specific parts of planning policy take these ideas forward. Planning Policy for Wales expects sustainable development to be a key priority for Local Development Plans.
- 3.19 The ‘Wales Spatial Plan’ update is the national development plan in Wales. Conwy is influenced by three Spatial Plan sub-areas, that of North East Wales, North West Wales and to a lesser extent Central Wales. Within each there are differing priorities for development all of which must be taken into account in the approach taken to development in the County Borough.
- 3.20 The vision for North West Wales – Eryri a Môn, in the Spatial Plan update 2008 is:

“A high quality natural and physical environment supporting a cultural and knowledge-based economy that will help the area to maintain and enhance its distinctive character, retain and attract back young people and sustain the Welsh language.”

3.21 The vision for North East Wales – Border and Coast, in the Spatial Plan update 2008 is:

“An area harnessing the economic drives on both sides of the border, reducing inequalities and improving the quality of its natural and physical assets.”

3.22 The Wales Spatial Plan Update 2008 sets out key elements of realising these visions for the sub-areas. Those of most relevance to Conwy include:

- The need to develop sustainable accessibility between hubs, coastal and border towns and the rural parts of the area
- The role of the A55 as a Trans European network
- The principle hub of around Llandudno, encompassing Conwy, Llandudno, Llandudno Junction, and Colwyn Bay, is a key regional economic driver.
- There is a need in Conwy to broaden the economic base and raise the profile of the counties’ environmental assets will be an important focus to provide high quality employment opportunities, building on strengths and fostering a unique sense of place
- There is sufficient or even surplus levels of employment land allocated in land use plans, but this may not be of the type and quality suitable demands of employers, such as a need for smaller units for service or high value manufacturing
- Conwy, Colwyn Bay and Llandudno are regional tourism centres, although some investment is needed due to change in demand for traditional seaside resorts
- Conwy and Llandudno provide important retail, administrative and service functions for a large hinterland
- Relocation and concentration of the Welsh Assembly Government offices to Llandudno Junction and the opportunity for wider economic development in this area
- Colwyn Bay is the second largest urban area in North Wales, but has experienced a lack of investment and a range of socio-economic problems due to a declining economic base.
- In Conwy there are issues around people moving to the area to retire, which creates particular pressures for planning of housing and service provision.
- In Conwy past residential development rates have generally been above the annual requirements set, although this has little benefit to delivery of affordable homes

- Factors effecting affordability of homes include a high proportion of people live and work in the area and incomes are relatively low, mainly due to the structural mix of the economy
 - The role of Llanrwst that provide tourism, employment, outdoor activities, retail, service and local employment that supports a wider rural hinterland
 - High quality natural environment, including internationally designated nature conservation sites on the coast and the National Park. Many built heritage assets including Conwy World Heritage Site
- 3.23 The only 'key settlement of national importance' identified in the Wales Spatial Plan Update 2008 near Conwy is Bangor. The immediate area is identified as an area for economic development, and clearly this will influence the County Borough. Issues relating to commuting for work will be very important here.
- 3.24 The Llandudno hub, which includes Llandudno, Llandudno Junction, Colwyn Bay and Conwy, is identified in the Wales Spatial Plan Update 2008 as 'cross-boundary settlements'. The reason for this is the role these areas play in North East, North West Wales and Central Wales.
- 3.25 The plan suggests that Llandudno, Llandudno Junction and Conwy occupy a strategic position as a hub connecting North East and North West Wales as a retail, service and employment centre serving a large hinterland. The plan notes that there are areas of potential conflict between the environment and development.
- 3.26 The full suite of Technical Advice Notes and policy were used to inform the SA. With particular attention paid to 'Planning Policy Wales', which sets out the process for producing LDPs and the sustainability appraisal requirements. TANs of relevance to the SA process, which need to be taken into consideration in the SA of the Conwy LDP, are set out below.
- 3.27 Technical Advice Note 2: Planning and Affordable Housing (2006) provides advice on how the provision of affordable housing can be made through the planning system. It supports a revised policy that is set out in the Housing MIPPS (01/2006). This includes a new requirement to set a target for the level of provision based on local needs, state how this will be met and monitor its implementation.
- 3.28 Technical Advice Note 4: Retailing and Town Centres, (1996), gives practical advice on policy formulation for town centres and retail including, needs assessments, general principles and car parking standards.
- 3.29 Technical Advice Note 5: Nature Conservation and Planning, (1996), gives detailed advice on protection and designation of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). TAN 5 also looks at SSSI's and Local Nature Reserves (LNR). Nature conservation outside of statutory sites and areas is also advised, namely in Sites of Importance for nature Conservation (SINC) and Regionally Important Geological Sites RIGS. Protecting and conserving nature generally is also discussed in TAN 5.

- 3.30 Technical Advice Note 6, Agriculture and Rural Development (2000), outlines policy and guidance on rural, specifically agricultural and rural economic affairs. The TAN includes guidance on farm development and diversification, the re-use and conversion of rural buildings, forestry and development involving horses.
- 3.31 Technical Advice Note 8, Renewable Energy (2005), has specific land use implications for Conwy. Amongst areas of search for onshore wind energy, a site for 140MW has been identified on the boundary between Denbighshire and Conwy at Clocaenog Forest. This TAN provides the necessary detail to implement revised policy on Renewable Energy in MIPPS 01/2005.
- 3.32 Technical Advice Note 12, Design, (2002), includes important advice on many aspects of urban and building design. The TAN covers a wide range of issues important to general sustainability including; inclusive design, transport and movement, landscape, biodiversity, urban regeneration, the public realm, public buildings, public art, the historic environment, housing design and layout, employment and commercial areas, rural areas, resource efficient buildings, and design and public safety.
- 3.33 Technical Advice Note 13, Tourism, (1997), has specific relevance to Conwy. The TAN encourages good planning with regard to tourism and the promotion of sustainable tourism.
- 3.34 Technical Advice Note 14, Coastal Development, (1998). Encourages well designed and sustainable development in coastal areas.
- 3.35 Technical Advice Note 15, Development and Flood Risk, (2004). Provides Guidance to authorities regarding development and flooding, including the need to consider the effects of Climate Change and the use of Flood Risk maps.
- 3.36 Technical Advice Note 16 Sport and Recreation, (1998), outlines the safeguarding of provision and the development of sport and recreation facilities through the planning system.
- 3.37 Technical Advice Note 18, Transport, (1998), gives detailed advice on the policies and procedures regarding planning and transport and concerning new infrastructure. It has guidance, on walking, cycling, as well as inland waterways and public transport.
- 3.38 Technical Advice Note 20, The Welsh Language - Unitary Development Plans and Planning Control, (2000), encourages planning authorities to fully take account of the effects of Plans on the Welsh Language, specifically advertising and other controls that can effect provision for and promotion of the Welsh Language.
- 3.39 Technical Advice Note 21, Waste (2001), sets out the provisions that should be made for waste planning and sustainable waste management, supporting the Wales Waste Strategy. This uses principles of proximity and self-sufficiency, and prioritising waste management under the waste hierarchy with reducing waste the priority and disposal the least favourable option.

- 3.40 Minerals Technical Advice Note, Aggregates (2004), outlines the approach that should be taken when planning for primary aggregates, mineral waste and secondary/recycled aggregates. The overarching objective is 'to ensure supply is managed in a sustainable way so that the best balance between environmental, economic and social considerations is struck, while making sure that the environmental amenity impacts of any necessary extraction are kept to a level that avoids causing demonstrable harm to interest of acknowledged importance.'

Local and Regional Policy

- 3.41 The Conwy Document 'Related Plans and Strategies Background Paper' gives an excellent overview of the local policies and plans in Conwy, much of the information below has used this paper.

- 3.42 One of the most important documents to consider for both the LDP preparation and the SA is the Community Strategy. The Conwy Community Strategy (CCS), *A community strategy for Conwy 2004-2014*, provides an overarching planning framework for all other strategies, including the Local Development Plan.

- 3.43 The Community Strategy's vision for Conwy is,

"a place of natural beauty, a safe community that cares for its people who have ambition for the future".

- 3.44 This vision is supported by four main guiding principles, these are:

- **Fair and Inclusive Conwy** – everyone should feel part of the community of Conwy irrespective of personal circumstances or personal choices
- **Social and Cultural Identity** – the people of the County Borough of Conwy are proud of its culture and particularly want to continue to protect and develop the Welsh language
- **Protecting the Future** – whilst we are meeting the needs of present generations we must do so without compromising the ability of future generations to meet their own needs
- **Information, Involvement and Empowerment** – people in Conwy want to be informed so they can actively participate in its future well being

- 3.45 The Community Strategy approach is then set out in five key themes: Health, Prosperity, Safe Communities, Quality Environment, Learning and Creativity. Although most of the aims and sub objectives of the Community Strategy will bear some relationship with the aims of sustainability, with specific reference to the land use plan and sustainability issues of the five key themes;

- **A Healthy Place**; a land use plan can encourage sport and activity through promotion and protection of open space, land use planning also has an essential role to play in providing affordable housing

- **A Prosperous Conwy;** the local plan can help to create a mix of employment sites in good and accessible locations as well as protect existing employment sites from higher value land uses, the plan can also assist in creating a higher proportion of energy from sustainable sources. Through policy the plan can also help to secure new infrastructure investment opportunities.
- **Strong and Safe Communities;** through good design of new developments and improvements of existing ones, crime and fear of crime as well as accidents can be reduced.
- **A Quality Environment;** the local plan can help to protect and enhance the built and natural environment. The local plan also has a role to play in increasing the amount of waste that is recycled and in developing art
- **Encouraging Learning and Creativity;** a land use plan can have some impact on this objective through ensuring accessibility to learning opportunities and securing contributions to education where relevant.

- 3.46 The '*Conwy Regeneration Strategy*' sets out the direction and vision for the Plan Area through to 2015. The strategy follows on from the Community Strategy, the regeneration strategy has some direct links to sustainability and the Local Plan.
- 3.47 The focus is on economic growth, regeneration, and creating cohesive communities. The Local Plan can support this strategy by ensuring a good supply of suitable land for employment and other development. Infrastructure improvements are also a key part of the Regeneration Strategy.
- 3.48 The '*North Wales Development Strategy*' (2004), produced by the North Wales Economic Forum, looks at the whole of North Wales in economic terms, many of its principles are of a similar nature to those contained within the Regeneration strategy. The emphasis is placed upon the growth of new businesses and entrepreneurship.
- 3.49 The *Tourism Strategy for North Wales 2003-2008 'Planning tomorrow's tourism today'* (October 2003) is the most current tourism strategy, produced for the Tourism Partnership for North Wales. This has a strategic priority to
 "strengthen the unique sense of place, improve the quality of tourism facilities in North Wales and to reduce seasonality across the region"
- 3.50 This strategy includes strengthening the role and integration of the North Wales Coastal Towns of Llandudno, Colwyn Bay and the adjoining resorts as the premier seaside resort and conference centre in Wales
- 3.51 Inland Betws-y-Coed area makes up one of the four Tourism Growth Areas (TGA's) in North Wales. Key projects include a number of cycle and walking access improvements, establishing Llanrwst as a mountain biking gateway, signage improvements and an attraction/craft/retail development.

- 3.52 A land use plan has a role to play in the implementation of these strategies through providing sufficient quantities of land and improving the quality of areas through policy.
- 3.53 The 'North Wales Regional Waste Plan 2003-2013' has been agreed by the Welsh Assembly and the planning authorities in north Wales. The waste plan aims to provide a land use planning framework to enable individual waste authorities in the region to allocate sites for waste management facilities. The strategy also aims to regard waste as a 'resource' by recognising recycling and composting opportunities. The waste plan has had its first review with a recommended draft March 2008.
- 3.54 The Waste Plan review has the vision:
- "To provide a land use planning framework for the sustainable management of wastes and recovery of resources in North Wales with the following aims:
- to minimise adverse impact on the environment and human health
 - to minimise adverse social and economic impacts and maximise social and economic opportunities
 - to meet the needs of communities and businesses
 - to accord with the legislative requirements, targets, principles and policies set by the European and national policy frameworks."
- 3.55 The Conwy CBC 'Local Housing Strategy' is designed to address the issues for housing and in particular affordable housing in Conwy. The main land use objectives are to; increase the supply of affordable housing, and maximising planning powers to achieve this; the provision of rural housing; develop gypsy and traveller policy; promote sustainable housing development; provide more hostel accommodation.
- 3.56 As with other authorities in Wales, Scotland and England, Conwy has produced a Biodiversity Action Plan (BAP). The main land use implications of which are; addressing the demand for development whilst protecting biodiversity; encouraging more sustainable transport modes; protect and enhance natural and semi-natural habitats and ecosystems; create new habitats; ensure that policy does not harm local biodiversity.
- 3.57 The current Conwy CBC Local Transport Plan sets out how the authority will approach local transport up to 2006. In future a more 'regional' transport plan will be prepared jointly by all six of the north Wales Authorities.

4 Key baseline information

Introduction

- 4.1 The review of the baseline information considers the main environmental issues in Conwy. The review has identified the main sustainability features in the plan area, providing concise details of what the situation is now, and where possible, has made predictions about the changes to the baseline in the future if a 'business as usual' approach was followed and no LDP was prepared. In addition for each matter it has considered what impact the LDP could have on the baseline, and particularly where the LDP could have a beneficial impact. This is important to show the reason that the baseline information has been collected, and its relationship to the plan.

Water quality

- 4.2 Environment Agency monitoring shows that there is generally good water quality in and around the plan area. In regard to wastewater quality, much of the pollution of surface waters is beyond the control of the LDP as it comes from agricultural sources. Similarly, problems with Irish Sea contamination are also affecting coastal waters on a wider scale than just in the plan area.
- 4.3 With regard to development, every attempt should therefore be made to ensure there is sufficient sewerage treatment capacity for all new development throughout the County Borough. Infrastructure would need to be provided to separate storm-water run-off from wastewater, to make sure at times of heavy rainfall coastal and river waters do not become polluted storm overflows. The design of development should aim to incorporate as many water efficiency measures as possible.

Flooding

- 4.4 The coastal areas of Conwy are subject to flooding; principally Pensarn, Towyn, Kinmel Bay and Llandudno, and more limited flood risk areas are located inland from the coastal strip. The plan area is covered by the Conwy Tidal Flood Risk Assessment, which details the most important defences in terms of flood defence failure, and the risks of overtopping of defences.
- 4.5 With regard to this, development should only take place in areas susceptible to flooding in line with TAN15. Particular care also needs to be taken to control development in areas at risk of flooding, particularly the eastern coastal strip.
- 4.6 Using Sustainable Drainage techniques to reduce water run-off rates should also help in avoiding increasing the risk of flood caused by new development.

Air pollution

- 4.7 Air quality in Conwy is generally good, meeting NAQS (national air quality standards) and no Air Quality Management Area (AQMA) has been designated in the LDP area.

- 4.8 Besides a few sites with industrial emissions, the majority of air pollution in the county will come from road transport and the combustion of fossil fuels. This means that air quality does occasionally deteriorate in areas near busy trunk roads and urban areas.
- 4.9 In addition, secondary pollutants caused by the reaction of chemicals in the air with sunlight or water can occur in locations far from their source, and therefore rural areas may be affected by air pollution. The soil in the County Borough is particularly sensitive to acid rain, due to high rainfall, acid soil, geology and industrial use factors. Emissions from the burning of fossil fuels will also contribute to climate change, and therefore every attempt should be made to reduce this.
- 4.10 Conwy is designated as a radon affected area, as there are locations within it where it is estimated that more than 1% of homes exceed the Government Action Level for Radon, and this will need to be taken into account in the design of new buildings, and particularly homes.
- 4.11 It may be suitable to make sure that the development brought forward through the LDP reduces, or at least does not cause, an increase in car use.
- 4.12 The efficient design of new buildings should be ensured, as well as increased energy generation from renewable resources, in order to reduce the need for energy supplied from fossil fuels.
- 4.13 Sensitive development should be located away from areas identified as having a higher risk of air pollution.

Climate change

- 4.14 It is predicted that in the document 'Climate Change Wales – Learning to Live Differently' (2001) produced by WAG, there is likely to be an increase in average annual temperature of about 0.8-2.2 °c by 2050. Sea level is also predicted to rise by between 18-79 cm by 2050, although it is thought it will have more impact in south Wales than the north.
- 4.15 Within the County Borough development that leads to an increase in release of greenhouse gases that contribute to climate change need to be minimised. This includes reducing the need to travel, particularly by car. There is also a need to increase renewable energy generation within the County Borough. In addition, provision will have to be made to try to limit the effects of climate change, including protection from flood risk and maintenance of climate sensitive habitats.

Built Environment and Heritage

- 4.16 There are numerous Conservation Areas, Listed Buildings and Scheduled Ancient Monuments in Conwy. In addition there is part of the internationally recognised World Heritage Site 'Castles and Town Walls of King Edward' in the County Borough.

- 4.17 All proposals must take into account the important and substantial historic built environment within the Conwy plan area.

Parks and Gardens and Landscapes

- 4.18 The 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales Part 1: Parks and Gardens' identifies 24 registered Parks and Gardens in the County Borough. These need to be appropriately conserved in new development.
- 4.19 There are also five Historic Landscapes designated that are either wholly or partly within the Plan Area/County Borough. Two are shared between the plan area and Denbighshire. Two are shared between the plan area and the National Park. One is shared between the plan area, the National Park and Gwynedd.
- 4.20 It is vital that the LDP retains these high quality landscapes, and that any development does not harm the specific qualities that are the reason for their identification. The plan should ensure high quality design and carefully sited development only in these areas, in keeping with the character of the area.

Nature Conservation

- 4.21 Conwy County Borough Council has adopted a Local Biodiversity Action Plan (LBAP) to protect the local area. A specialist group, the Conwy Biodiversity Working Group has also been established to aid implementation. The LBAP identifies priority species and habitats and includes aims and objectives for their enhancement and protection. There are additionally several local priority habitats for which action plans have yet to be agreed.
- 4.22 Moreover, there are also many designated sites within Conwy, which have been identified as being of international, national and local importance for conservation and biodiversity. These include European Natura 2000 sites, including the Special Protection Areas at Traeth Lafan, Conwy Bay (eastern section) and Mignient-Arenig-Dduallt, and the six Special Areas of Conservation wholly or partially located in Conwy LDP area. There are 40 nationally designated Sites of Special Scientific Interest, and one National Nature Reserve. Locally important wildlife sites have also been identified in the area.
- 4.23 Having regard of this, only in exceptional circumstances development should be located in these designated sites, and development plans should ensure that species and habitats are protected from harm. Where appropriate, development should help enhance the wildlife resource in the plan area, particularly in relation to BAP habitats and species. The LDP should aim to prevent any further fragmentation of habitats, and restore links as necessary. Care also needs to be taken in the renovation and restoration of buildings to ensure species protected by law are not negatively affected.

Land Use in Conwy

- 4.24 The main use of land within the county other than for housing is for agriculture, with only a small number of industrial sites. There are several grade 2 and grade

3 areas of agricultural soil, which can be used for arable farming. The rest of the plan area consists of grade 4 and 5 listed soil and this is only suitable for grazing. There is the risk of contamination of some areas of soil in the County Borough, particularly on previously used industrial sites.

- 4.25 There is a limited supply of good quality agricultural land within the county; therefore, it is important that this resource is protected. Development must take into account risks of land contamination and carry out appropriate remediation where necessary.

Waste

- 4.26 The North Wales Regional Waste Plan covers the area, and runs until 2013. This plans shows that the majority of Conwy's waste comes from construction and demolition, then from commercial and industrial, then from municipal and solid waste. Currently there are two landfill sites and several transfer facilities within Conwy.
- 4.27 The existing landfill site has a 10-year capacity, and there may be a need for new landfill site locations to be found within Conwy. It therefore may be suitable for the development plan to identify suitable locations and/or set stringent policies on such a site.
- 4.28 The 2008 regional waste plan revision identifies that there is infrastructure to manage around 190 tonnes of waste a year in Conwy. Waste is mainly sent to landfill, for which there is good capacity. This is almost all transferred out of the County Borough for disposal or further management elsewhere.
- 4.29 In the future new land needs to be found for additional waste transfer stations, open windrow composting and recycling. Land adjoining the Llandulas landfill and at Gofer are identified as potentially suitable for new waste management facilities in the Waste Plan.
- 4.30 Additionally, in order to reduce the waste going to landfill, it is important the plan identifies suitable sites for recycling and sorting facilities, and that it maximises adherence to the waste hierarchy by ensuring new development contains suitable locations for waste sorting and collection. Where possible mining and quarry waste should be re-used.

Social and Economic Issues

- 4.31 The population of the County Borough in 2004 was 111,800. This shows an increase of 3.1% over the decade, compared to a Wales average of only 1.0%. This population is concentrated in the coastal belt of the County Borough, including the towns of Llandudno and Colwyn Bay. The population of the area also contains a higher percentage of residents of a pensionable age, at over a quarter of the population, whereas it is only a fifth of the population on average in Wales.
- 4.32 There are a high number of Welsh speakers in the County Borough, and in some parts of the rural area Welsh is spoken by up to 74% of the population. However,

this hides a marked distinction between the rural area, where a large proportion speak Welsh, and the coastal towns where a much lower proportion speak Welsh. In general Welsh speaking increases east to west across the area, north to south in the plan area.

- 4.33 With an ageing population, the plan must ensure that there is maximised accessibility to affordable homes, local services and community facilities for disadvantaged groups as well as aiming to attract more, younger, people to stay in the area. The plan should also take into consideration the dispersed populations of Welsh speakers in the County Borough.

Housing Needs

- 4.34 It has been shown that there is a substantial overall shortfall in housing across the County Borough. The 2002 housing needs study and local housing strategy 2004 highlighted that the largest proportion of the shortfall for housing demand was for owner occupied housing, and that the next was for affordable housing of some kind.
- 4.35 The age profile has become older and the challenge of meeting the particular housing requirements of this sector of the population.
- 4.36 The plan should give clear definition on what the authority considers to be affordable in the plan area, and support initiatives such as exceptions sites for rural affordable housing. Support also needs to be given to ensuring affordable housing remains in perpetuity through Registered Social Landlords and planning obligations. In rural areas particular policy approaches such as 'rural exception sites' may be necessary to deliver affordable homes in these areas.

Employment position and economic potential

- 4.37 The Regeneration Strategy 2004-2014 for Conwy states that there are 61,500 of working age in Conwy, representing 55% of the total population, this is lower than the Wales average of 59% and the Great Britain average of 61%. The largest employment sector, according to the 2001 census, and Annual Business Inquiry Employee Analysis (2003), is the service sector including public administration, education and health. Other major sectors are distribution, hotels and restaurants.
- 4.38 A study carried out by the Welsh Development Agency and the Cardiff Business Schools shows the County Borough has the lowest levels of GDP in Wales, and therefore one of the lowest in Great Britain.
- 4.39 Most employment was identified as being in the service industries and tourism. The reliance on tourism means that employment in Conwy can be very seasonal and based around the summer months. Conwy is characterised by a low wage economy, dominated by small businesses, and relatively large amount of part-time employment compared even to North Wales averages.

- 4.40 Manufacturing has declined over the past decade, to only 6% of employees by 2003. Employers also identify that they have vacancies that cannot be filled due to lack of appropriate skills, qualifications and experience.
- 4.41 There were a large number of outward commuters recorded in the 2001 census, and the number of inward commuters was approximately half the amount.
- 4.42 The plan should therefore support growing business sectors and actively seek to encourage the diversification of the economy, to ensure it does not rely on seasonal employment. Support needs to be given to skills training in the area. To protect the environment, every attempt should be made to limit the amount of commuting in and out of the County Borough, particularly if this occurs by car. Reducing the need to travel is a key theme of promoting more sustainable spatial development.

5 The sustainability objectives

- 5.1 The objectives proposed for use in the SA were developed during the earlier work on the sustainability appraisal of the UDP. These are shown in table 5.1.
- 5.2 At the start of the SA process of the UDP a workshop was held to consider sustainability in the area. The workshop involved stakeholders with a variety of social, environmental and economic interests. Therefore, the conclusions reached and meant that the outputs of this workshop remained relevant and transferable to developing a set of objective for the SA including SEA. Discussion at the workshop included considering sustainability objectives for Conwy.
- 5.3 These objectives were also included in the scoping report, and consultees responded on their appropriateness, this resulted in changes being made including the addition of an objective on cultural heritage.
- 5.4 The basis for creating objectives for sustainable development in Conwy is a fundamental understanding of sustainability, which is that:
- access to resources in the future should be at least as it is now
 - access to resources for some should not be denied by the actions of others.
- 5.5 To use such ideas in examining a land use or spatial plan however, something more specific is needed, and we use the idea of sustainability objectives to establishing a common understanding of what it means to achieve greater sustainability amongst those involved with examining a plan.
- 5.6 The sustainability objectives were developed using the four objectives of sustainable development from the UK Government, sustainable development strategy, 'A Better Quality of Life' (May 1999) as a starting point, there are:
- social progress which recognises the needs of everyone
 - effective protection of the environment
 - prudent use of natural resources
 - maintenance of high and stable levels of economic growth and employment.
- 5.7 Although these objectives have since been replaced by the 2005 UK Sustainable Development Strategy, at the time of developing the sustainability framework the 1999 objectives were still current.
- 5.8 The aim is for the sustainability objectives to identify those matters of environmental economic and social capital that are basic to well being and which we want as much of or more of in the future. The sustainability objectives identify these basic elements together with what constitutes a better position for each element. It tries to be comprehensive whilst keeping the different objectives distinctive.

- 5.9 Quantifying each of these objectives, and developing relevant indicators would be difficult as the very nature of the majority of the content of a development plan would not enable change to be directly attributed to the influence of the plan or to be measured. Therefore, the SA is principally concerned with whether the direction of change that the Plan would be likely to bring would be positive in achieving more sustainable development, rather than with attempting to quantify changes. It may however be possible to update these objectives with targets by the time the SEA of the LDP occurs, and as part of the monitoring process.
- 5.10 The objectives presented in table 1 take the form of a 'headline' supported by an objective which sets out what the Plan should be trying to achieve in terms of environmental protection.
- 5.11 An additional column of information has been included in the sustainability objectives from the previous version available at scoping. This addition shows examples of how the LDP could help in meeting the sustainable objective. The purpose is to tie the high-level objective to practical considerations for policy planning. These examples also help to in the appraisal questions by providing queries against which policy content can be assessed.
- 5.12 Climate change is a significant challenge that planning needs to address. In delivering sustainable development climate change issues have crosscutting relevance. For instance, climate change covers issues of mitigation relating to access and emissions and adaptation relating to building design, flood and nature conservation. Therefore, table 5.1 shows in italics the examples that are relevant to climate change.

Table 5.1: Sustainability objectives for use in the SA of the Conwy LDP (*examples in italics are to indicate which matters have crosscutting relevance to climate change*)

Concern	Sustainability objective	examples of LDP influence on meeting SA objective
Social progress which recognises the needs of everyone		
Access to services	<ul style="list-style-type: none"> Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation 	<ul style="list-style-type: none"> help in creating development of the type and design that can help avoid adverse impact on the community, such as development that deters anti-social behaviour support the growth of mixed use area at transport hubs that have good accessibility by a variety of modes of transport prioritise walking and cycling, then public transport and finally car users in town centres <i>reduce reliance on car use to help reduce greenhouse gas emissions</i> reduce disparities in access to services through a combined approach of suitable facility and service provision and public transport links support the access of rural communities to jobs and services, ideally within villages but also through good public transport networks
Community and culture	<ul style="list-style-type: none"> Maintain and enhance community cohesion and identity 	<ul style="list-style-type: none"> ensure services and facilities that serve to support local communities are maintained and enhanced as part of new and existing development allow the communities to be involved in the planning decisions that effect them help support rural communities, including by helping people remain living in their local area support a demographic range in all communities, including children, young people, working age and retired people help in creating development of the type and design that can help avoid adverse impact on the community, such as development that deters anti-social behaviour
Health and well-being	<ul style="list-style-type: none"> Provide a clean, healthy and safe environment for all 	<ul style="list-style-type: none"> protect people from the negative health impacts of polluted air and water ensure equitable access to health services ensure that new development is designed in such a way as to reduce crime and fear of crime protect people from the risks of unstable or contaminated land ensure new development is not in areas at known risk of flood enhance opportunities for healthy living and help support more healthy

		<p>lifestyles through access to open space and prioritised cycling and walking routes</p> <ul style="list-style-type: none"> • <i>protect people for the negative impacts of climate change, such as increased summer temperatures, adverse weather and flooding, through the design and location of new development.</i> • <i>ensure that appropriate flood risk protection measures are in place to protect residents well-being</i>
Housing	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs 	<ul style="list-style-type: none"> • provide more affordable housing to meet the needs in rural and urban locations, to enable young people and families to remain in their own communities • provide a range of homes to meet the diverse needs residents, including family homes and smaller flats and retirement units • build good quality housing throughout Conwy
Effective Protection of the Environment		
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area 	<ul style="list-style-type: none"> • provide a strong level of protection to sites designated for the national or international importance for nature conservation • allow people to have better access to suitable areas of nature conservation importance to help everyone better understand and value their natural environment • secure opportunities to achieve a net gain in biodiversity through development • development should lead to no net loss in biodiversity • statutory and non-statutory designated nature conservation sites should be afforded a level of protection appropriate to their status • ensure new development does not cause the further fragmentation of habitats and protect and enhance network routes for flora and fauna movement • support landscaping that makes use of species that will support native biodiversity • <i>protect habitats that provide migration routes for species in response to a changing climate</i>
Landscape character	<ul style="list-style-type: none"> • Ensure special and distinctive, semi-natural and historic landscapes and their specific features are conserved and 	<ul style="list-style-type: none"> • help protect and enhance the rural and coastal landscapes, including the setting of the Snowdonia National Park, Great Orme's Head Heritage Coast and Historic Landscapes, as a living and working asset, for their visual quality, and as a recreation resource

	<p>enhanced</p>	<ul style="list-style-type: none"> • protect the setting of towns and villages in the landscape and enhance the transition of urban to rural • help in the positive management of landscapes to protect and enhance their character • <i>ensure that new landscaping planting can adapt to a changing climate, including increased summer temperatures and storm events and fewer frosts.</i>
<p>Built environment</p>	<ul style="list-style-type: none"> • Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards 	<ul style="list-style-type: none"> • ensure new development is designed so as to create places that support people making good quality places for living, working and leisure • <i>develop towns that promote walking and cycling and are not focused on car use</i> • ensure that the design of new building adds to the character of the area through high quality design and layout • promote and protect design led development and buildings of local as well as national architectural importance • <i>ensure the layout and design of new development helps reduce energy demand and therefore greenhouse gas emissions</i> • <i>ensure new development is designed to be able to adapt to the impacts of climate change, including increased summer heating, storm events and flooding</i>
<p>Cultural heritage</p>	<ul style="list-style-type: none"> • Conserve and enhance the built and archaeological cultural heritage features of the area 	<ul style="list-style-type: none"> • ensure new development takes account of and protects and enhances where necessary the cultural and historic heritage • where possible identify historic features at risk and help restore these bringing them back into good use • ensure buried archaeological assets are protected from harmful impacts of development, or other appropriate management where suitable • ensure that the features of historic landscape are respected in new development • ensure that locally important heritage is suitably considered in planning for new development • <i>where planning permission is required ensure the restoration and repair of historic built heritage is carried out to withstand the impacts of climate change, including adverse weather events</i>

Prudent use of natural resources		
Energy	<ul style="list-style-type: none"> Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources 	<ul style="list-style-type: none"> <i>promote energy generation from renewable resources, including micro-generation as part of the energy requirements of new development</i> <i>ensure that energy is used more efficiently, including in the design of new development, through promoting local energy generation and reducing car travel</i> <i>help to implement energy schemes that will help meet Wales targets for renewable energy generation, where suitable</i> <i>promote community or district heat and power schemes</i>
Land	<ul style="list-style-type: none"> Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant 	<ul style="list-style-type: none"> protect greenfield land from development where development would be more suitability located on brownfield land use suitable density standards that ensure the best use of developable land in appropriate locations avoid building on higher quality agricultural soils ensure contaminated land is subject to appropriate remediation to bring it back into suitable use
Water	<ul style="list-style-type: none"> Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding 	<ul style="list-style-type: none"> ensure new development has sufficient sewerage and waste water treatment to avoid harm to water quality ensure contaminated land is suitability remediated to avoid water quality impacts implemented suitable SUDS to avoid run-off of potential polluted water to water courses or aquifers reduce diffuse pollution help to meet objectives of achieving good ecological status for surface waters; good status for groundwaters; and no deterioration across all water bodies <i>ensure new development makes the best use of potable water, incorporating re-use of grey water in new development</i> ensure development takes into account the impacts of climate change and reduce summer water availability in planning outdoor spaces ensure that new development does not give rise to increased risk, either on site or through development that exacerbates flooding elsewhere <i>ensure that new development is located so as to avoid the risks of fluvial and tidal flooding associated with climate change</i> <i>aim for greenfield water run-off rates from new development</i>

		<ul style="list-style-type: none"> • <i>make use of SUDS to avoid run-off to rivers</i>
Air and Atmosphere	<ul style="list-style-type: none"> • Reduce all forms of air pollution locally and globally improve the atmosphere 	<ul style="list-style-type: none"> • help reduce reliance on car travel by making sure there are real viable alternatives available for all people • ensure new development in town centre locations does not lead to worsening air quality, • help to reduce energy use and thereby help to reduce emissions from coal, oil and gas power generation • control the locations of polluting development to ensure it is not located near residential areas • help reduce waste to landfill, and set standards for management, to avoid methane emissions • <i>help reduce greenhouse gas emissions through reducing car travel, waste management and reduce energy demand from non-renewable resources</i>
Minerals and primary resources	<ul style="list-style-type: none"> • Safeguard non-renewable resources and promote reuse of primary resources 	<ul style="list-style-type: none"> • <i>reduce waste, particularly to landfill</i> • safeguard mineral resources • encourage better building practices that reduce construction waste and ensure demolition waste is reused in development • help to reduce the use of primary resources by providing appropriate sites for more sustainable waste management, including re-processing, recycling and storage • <i>help reduce greenhouse gas emissions through reducing waste to landfill and suitable management of landfill gases</i>
Maintenance of high and stable levels of economic growth and employment		
Economic diversification	<ul style="list-style-type: none"> • Encourage diversification of the economic base in rural and urban areas 	<ul style="list-style-type: none"> • support the diversification of the rural economy and continued support to farming, encouraging food production for the local market • help in increasing the income to the area through tourism
Employment access	<ul style="list-style-type: none"> • Ensure that there is good access for all to employment 	<ul style="list-style-type: none"> • maintain a motivated, highly skilled and educated workforce • provide a better match between the skills of the workforce and the type of jobs available

		<ul style="list-style-type: none">• promote local employment to reduce people's need to travel to find work
Encouraging investment	<ul style="list-style-type: none">• Emphasise and increase factors conducive to wealth creation and attractiveness to investors	<ul style="list-style-type: none">• provide an infrastructure of transport, communications and land that helps attract new business, including the start-up and growth of indigenous businesses• maintain a coherent and successful range of businesses and build up local supply and distribution chains• supply a range of employment sites, including those that are suitable for start-ups, service industry developments and smaller high tech manufacturing

6 Sustainability appraisal of the LDP Vision and Objectives

- 6.1 This section of the sustainability appraisal (SA) looks at the vision and objectives developed for the LDP, and how these address sustainable development issues.
- 6.2 Assessment of the vision and objectives was part of the SA of the Preferred Strategy. The earlier appraisal identified that the vision, was compatible with sustainable development but lacked detail. The LDP objectives were found to be quite comprehensive in earlier versions.
- 6.3 Both the vision and objectives have been amended since the Preferred Strategy LPD and therefore have been re-appraised.

LDP Vision

- 6.4 The new vision is based on the vision for Conwy from the Community Strategy. The community strategy was developed in partnership including the Council and public bodies, the voluntary sector, the community and business sectors. For the LDP this vision and supporting commitments has been adapted to make it more spatially relevant for a development plan, to create the vision and objectives for the LDP.
- 6.5 The vision sets out in detail what the aim is for the future of Conwy, covering a range of issues from employment and housing to public transport and environmental protection. This reflects a desire for a more sustainable future, allowing growth to meet social and economic needs in a high quality natural and built environment.
- 6.6 The vision is not very specific on the roles of different towns and villages, simply dividing the area into rural or urban. This lack of spatial information is identified in the sustainability appraisal of the strategy.
- 6.7 For instance, it would be useful to know what the aims are for main towns. For example, the aims of the economic hub of the region or towns where new housing or tourism development is intended to aid regeneration and renewal.
- 6.8 One of the very first paragraphs of the LDP does state:
- ‘The Council needs to protect Conwy’s outstanding natural and built environment, while at the same time maximising the provision of Affordable Housing for Local Need’
- 6.9 However, this is not intended as the vision for the LDP, which is set in later sections of the LDP. It is not clear what the purpose of this statement is, and why it is highlighted in the introduction for the LDP. In fact, this statement may conflict with the overall purpose of the LDP, which is not simply to protect the environment and provide affordable homes. The actual LDP vision is more complex, reflecting the complexities in delivering sustainable development, as it also includes economic growth, market housing delivery, waste management

facilities and better transport links. Therefore, revising the introductory section of the LDP may better reflect the varied role of an LDP.

LDP Objectives

- 6.10 The revised objectives also show a good coverage of sustainability issues. Each of the revised LDP objectives for the Deposit LDP has been appraised against the sustainability objectives to identify any gaps or recommend changes to these. This SA of LDP objectives is shown in Appendix 3.
- 6.11 The objectives are compatible with how the LDP Manual (WAG, 2006), which states, '*The LDP objectives should be capable of being addressed through the planning system*'. (section 5.5)
- 6.12 The majority of the objectives should help make a positive contribution to sustainable development, so long as they properly implemented through the strategy and policy. However, the SA did identify a few instances where there is the potential for conflict with sustainability objectives:
- Delivering housing and employment growth could have adverse impacts on the natural environment, and policies and allocations need to control this
 - Promoting the rural economy could give rise to unsustainable travel patterns, therefore rural enterprise needs to remain at a scale to service the local population only
 - Developing along infrastructure networks should avoid creating elongated 'ribbon' towns and villages. These can also create unsustainable travel patterns and impacts on the community by having no real accessible 'centre' and being over-reliant on car use. To achieve sustainable development a compact urban form is preferable.
 - Tourism attractions that are intended to have high numbers of visitors must be located in areas with very good public transport access, and parking should be managed to help reduce car travel
 - Design objectives should incorporate the need to design to prioritise non-car uses, with good efficient movement routes for pedestrians, and designing buildings so primary access is from pavements not car parks
 - In delivering renewable energy schemes the global and national benefits should be considered, as well as local impacts
 - New waste sites should be allocated to avoid impacts on the environment, such as air and water pollution, and on people's wellbeing, from impacts related to noise, odour and vermin.

7 Sustainability appraisal of options – growth and distribution of development

- 7.1 The preparation of LDPs should include developing and testing options for delivering different levels and distributions of growth. The reason is to identify how development could be delivered in the plan area to meet the needs of existing and future residents, while at the same time reducing the adverse impacts on development on people and the environment.
- 7.2 The SEA Directive requires that the environmental implications of alternatives are assessed and reported. The Directive states assessment is needed to identify, *'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme'* (SEA Directive Article 5(1)). However, the consideration of alternative ways of delivering development can also have implications for wider sustainable development objectives, and therefore these form part of the assessment.
- 7.3 It is important that all the options considered at this stage are realistic for the LDP, and therefore the alternatives must be:
- **reasonable**, in that they are plausible alternatives which could be implemented and they are realistic having regard to national policy
 - **related** to the objectives of the plan
 - within the **geographical scope** of the plan as they relate to the distribution of development specific to Conwy LDP area.
- 7.4 Options SA has been carried out at the Preferred Strategy stages for the LDP. Paragraphs 2.25 to 2.29 of this report briefly set out these stages and the SA reports prepared. The full SA report of Options and Preferred Strategy (June 2006) is available from the Council. The report includes more detail on the process and findings of the SA of options as they appeared at that time, and how a 'business as usual approach' was considered. The SA of options also considered the approach that was taken to deriving options, to assess whether this was based on good evidence.
- 7.5 A fuller discussion of options is part of the SA report on the preferred strategy, available from the Council. This earlier appraisal also looked at the economic growth options.

Growth options

- 7.6 The Deposit LDP stage in 2009 (and revised in 2010 and now in 2012) the options for growth were included in the plan that had not been previously part of Baker Associates SA at Preferred Strategy. Since the 2009 Deposit there has been considerable extra work on growth levels to reflect revised population statistics from Welsh Assembly Government. Subsequently, there have been further revisions to reflect additional work on population and household projections, as set out in the 2011 Population and Household. This work has

involved external consultants reviewing the housing growth necessary to deliver development in a way that meets the economic growth objectives of the Council. Findings of this external review are recorded in an LDP background paper 'Population and Household Projections' (August 2012).

- 7.7 The older versions of the growth options appraisal are available as part of the SA Reports. This includes the differing levels of growth put forward in for the Deposit LDP. The original report appears as Background Paper 3 of the LDP 'The options report'. The Report sets the options that were considered for growth, and includes the Council's own SA of alternatives. The completed assessment of sites by Council officers gives an indication of what the impacts could be from delivering different growth options. The officer SA demonstrates that a simple symbol summary of the relative impact of options may hide some of the complexity involved in identifying the differences in delivering sustainable development between alternatives. Therefore, the independent SA by Baker Associates (now part of Peter Brett Associates) also provides a check on the relative sustainability of options.
- 7.8 The sustainability appraisal of options looked at the generic difference for sustainability between pursuing high, medium and low levels of growth. This appraisal is not based on the actual needs of development within Conwy and the actual growth levels identified. However, it does provide a useful indication of the main impacts of growth on development. This stage of the SA does not repeat either the officer appraisal or the appraisal from the previous versions of the LDP. Instead, the purpose is to consider, in general terms, what the sustainability implications of aiming for a higher or lower growth rate than the preferred option might be.
- 7.9 The preferred approach is for 6,350 homes to be built in Conwy between 2007 and 2022. This works out at an average of 423 per year. The LDP identifies that in 2010 there are already 1,063 homes that have planning permission by are not yet built and a further 968 that have been completed since 2007. The LDP can only have influence on the remaining two thirds of housing development. This is about 4,300 homes, of which only 2,327 will be allocated in the Deposit LDP and 1463 on non-allocated 'windfall' sites and 509 from bringing empty homes back into use (figures from background paper Housing Land Supply (August 2012).
- 7.10 The level of growth that the LDP needs to provide for has reduced slightly in the Further Changes to 423 per annum from the level proposed in the 2010 Deposit LDP of 453 new homes per annum. These figures are quite low for a borough of this size.
- 7.11 The LDP also contains an extra contingency figure, possibly allowing a further 635 homes to be built over the plan period. This gives a total yield of 6,985 or 456 dwellings per annum. This is a considerable decrease from the 2010 proposed Deposit LDP, where a contingency of 1100 was allowed for. The Council will need to ensure that they have sufficient evidence to support the contingency figures and that they provide for a realistic level of development. How contingency sites will be used in covered by the sustainability appraisal in paragraphs 9.50 to 9.62.

7.12 The base housing yield is quite low in early iterations of options for growth it is only a little higher than the second lowest considered. A higher growth rate would have some apparent adverse impacts, which would clearly increase with higher levels of housing growth. Possible adverse impacts on sustainable development of higher growth include:

- a higher level of resource use during the construction and future use of homes, although it new homes are not built in Conwy it is likely they will be built anyway outside the County Borough
- higher land requirements, with the potential to have increased impacts on landscape quality, agricultural land and wildlife
- possible changes in the character of communities from larger scale housing development, this would depend on the location of growth and the existing character of communities.

7.13 However, there may also be positive sustainability implications of higher growth:

- new growth can deliver the 'critical' level of population necessary to support local shops, services and community facilities. This could include local villages schools, however, evidence gathered by the Council suggest that only very high levels of growth would secure long-term survival of some village schools
- new housing can be used to stimulate regeneration of communities, this can include using planning contributions to secure infrastructure delivery and community facilities
- more housing growth is likely to mean more affordable homes, this will also depend on the policies developed to help deliver new affordable housing
- as much of the housing in Conwy is already committed for development, a higher growth option could be used to allocate new sites for development more compatible with a sustainable spatial strategy, this would be beneficial to counteract any potentially negative issues related existing permissions that are no longer compatible with sustainable development objectives
- larger housing growth would allow opportunities to allocate large urban expansion sites for growth. This would be beneficial in creating new partly self-contained sustainable communities in Conwy. This type of site can also be planned to deliver a range of sustainability benefits, from new community facilities to opportunities for community or district energy and heat generation.

7.14 Lower levels of growth can also have advantages and disadvantages for sustainable development. Potential benefits include:

- lower land-take is likely to help in the protection of Conwy's landscape and natural environment

- matched with housing deliver for local needs lower levels of growth may help maintain the community character of smaller villages, including the Welsh language
- lower resource use in Conwy, although home are likely to be built elsewhere to help meet needs

7.15 There are also potential disadvantages:

- more difficult to implement successfully a sustainable spatial strategy, as choices are limited by the levels of growth already committed for development. For example, higher growth could help locate more housing in areas of planned economic growth, to create more socially and environmentally sustainable commuting patterns
- fewer homes being built are likely to make homes less affordable. This would be directly caused by fewer affordable homes to meet local needs housing being built, and there would be a continuing demand for existing stock from retirees and second home owners from outside Conwy, pushing up prices locally
- lower growth levels area likely to result in a less demographically mixed population, as the existing population ages, young people move away, and people retire to the area. This will have a range of impacts, including lack of a local workforce to meet the needs of local employers, and a changing community character in Conwy.
- lower housing growth will mean less money from developer contributions, missing opportunities for community regeneration and infrastructure improvements.

7.16 Looking at the actual level of growth being pursued, 423 new homes a year, some potential issues can also be identified relating to meeting the future vision for the plan area. The Council needs to be confident that the housing requirement identified in the plan match the need for jobs for the existing population, as well reducing out-commuting. This includes encouraging indigenous business growth and inward investment to create more jobs. However, to achieve this objective in a more sustainable way employment must be matched by local housing.

7.17 The external review of housing growth, on the 2010 Deposit LDP, recommended adopting the higher growth rate of 7,900 homes for the plan in one go, without resort to contingency. This would have supported economic strategy for the borough. Despite revised household projections (background paper 2 'Population and Household Projection' (August 2012)), to create a sustainable strategy it is necessary to align housing and employment land need. This will also avoid unnecessary allocation of sites for either housing or employment. Sustainability implications of the chosen growth (6,350) are identified as:

- A lower housing number risks not meeting affordable housing needs in the County Borough, even if all sites achieve the 30% target
- May not be sufficient to support forecast job increase, with impacts on achieve economic goals or creating unsustainable patterns of growth

- Likely to require less land for development and therefore help protect the natural environment.
- 7.18 If the plan sets the higher level of growth from the outset it may improve the chances of supply sufficient affordable homes to meet needs. It could also better support job growth targets. If suitable sites can be found in Conwy that preserve areas of high quality landscape, it may be suitable to pursue slightly higher levels of growth. This has the potential to provide social and economic benefits for Conwy.
- 7.19 It is not the housing growth level alone that will result in sustainability impacts, it is also fundamentally reliant on how it is distributed, how it is matched by other development type growth, the capacity of natural and built environment and the delivery of other plans and strategies in Conwy. This is part of delivering the overall spatial strategy approach for Conwy and the sustainability appraisal covers this in more detail in section 9.
- 7.20 The preferred growth level is above recent housing completion rates. The sustainability appraisal recommends that appropriate monitoring of housing completions and the take up of allocations is undertaken regularly throughout the plan period. As the LDP is pursuing the lower rates of housing allocation with a contingency it is vital that this is managed in a way that controls its release. The importance of managing contingency release is covered in paragraphs 9.50 to 9.62. Monitoring and review is needed so if housing is not coming forward as expected, or is coming forward at too quick a rate, so the LDP can be revised to make sure development is coming forward according to a sustainable spatial strategy.

The distribution of development

- 7.21 The options considered for the distribution of development at the Preferred Options stage vary slightly from those in the current options paper. One main change is how the different areas are referring to, with the new version referred specifically to different groups of settlements.
- 7.22 The main impacts, taken directly from the SA report of the Preferred Strategy are shown here:

Option 1 'Concentrating growth' concentration in the coastal strip

- likely to support simple travel patterns to meet residents everyday needs in terms of jobs, shops and services, and the creation of simple public transport corridors along the coast
- potential problems may be in finding sufficient land to accommodate this level of growth, particularly in relation to protecting development from flood risk, and protecting the natural environment particularly in Creuddyn.
- this option will not support the continued vitality of rural communities, although some housing will be allowed in these rural locations this may not be sufficient to meet local needs and affordable homes

Option 2 'Dispersing development' based on existing population size

- unlikely to give rise to sustainable patterns of development, as population size is not a good indication of the level of services and jobs available
- higher proportions of development this puts in the rural area may lead to unsustainable commuting patterns

Option 3 ‘Hybrid strategy’ – reflects recent patterns of growth

- the majority of new development (90%) in the coastal ‘hub’ and this will have similar implications as in Option 1
- a higher proportion of development is directed to rural locations under this option (than for option 1), this will allow the needs of rural residents to be better met, including new homes and economic development

Option 4 ‘Rural growth’- focusing growth in rural settlements

- least likely to give rise to sustainable travel patterns in the Plan area, and dispersed housing development will lead to an increased need to travel more and longer to meet their everyday needs
- this will be exacerbated by the majority of existing and future employment being located in the coastal strip and therefore housing will not be in locations to serve this, with travel and environmental impacts
- may support the viability of rural settlements, but may affect the existing character of these communities.

Option 5 and 6 ‘Coastal new settlement’ and ‘Rural new settlement’

- key impact of this option is that the amount of development that needs to be allocated to a new town to create a viable new settlement, with a critical mass of population to support services, would mean that no other sub-area of Conwy could develop
- other areas deprived of development, could cause negative impacts in these areas, and possibly causing the decline of some areas and settlement
- unsustainable travel patterns
- large land requirement, as a new settlement is unlikely to include any previously developed land, potential effects could be on biodiversity, landscape and loss of soil or mineral resources.

Alternative sites

- 7.23 Choice of sites is an important component of how alternatives are considered in the LDP. This involves reviewing all the sites with development potential to find those that best fit with the spatial strategy, are available for development and are not constrained and would not have significant adverse impacts on the natural environment.
- 7.24 Background papers have been prepared by the Council on the, ‘Justification for the Removal of the Proposed Development Sites Detailed in the Deposit LDP,

first in April 2009 and then again in March 2011'. These are reported in Background Paper 35.

- 7.25 Between the 2009 Deposit Plan, the 2010 plan and the 2011 plan there have been major reviews of allocations to identify a new set of sites for allocation. These reviews have been comprehensive, although it does raise a slight concern that the previous allocations were misleading. The Council needs to be confident it has a sound evidence base that demonstrates how preferred sites were selected from a number of alternatives. This will include the plan-makers sustainability assessment of all of the sites, which appears in Background Paper 21 – 'Site Deliverability' and Background Paper 35 'Justification for the Removal of the Proposed Development Sites.
- 7.26 The method of assessment of housing and employment sites for allocation in the 2011 Deposit plan, and previously for the 2010 Deposit plan, included several stages of sieving to a short list for detailed assessment. Background Paper 21 sets out the methodology and outputs of this assessment process. Despite not being part of the external SA undertaken by Baker Associates it is part of the sustainability appraisal process. Choosing the right sites is an intrinsic part of creating a more sustainable plan.
- 7.27 Table 7.1 shows the sustainability objectives developed for the SA and compares these with the criteria used for site selection. The table shows that the assessment of sites has good coverage of sustainability issues. Therefore, the site assessment process should help in identifying those that would make greatest contribution to sustainability development. Identifying site characteristics was aided by gaining input from stakeholders to provide expert opinion. Input was sought from local authority officers (such as highways, countryside, heritage etc.) and outside expertise (such as utilities providers, Environment Agency Wales and Countryside Council for Wales).

Table 7.1: Comparison of sustainability objectives and site assessment criteria

Headline	Sustainability Objective	Conwy County Borough site assessment criteria
Social progress which recognises the needs of everyone		
Access to services	Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation	<ul style="list-style-type: none"> • Sites were discounted that did not comply with local and national policy on settlement hierarchy, and therefore have limited access to services • Accessibility scoring of sites was undertaken, including distance to public transport and local shops. • Car access is assessed
Community and culture	Maintain and enhance community cohesion and identity	<ul style="list-style-type: none"> • Capacity of public services near the site was assessed to check they could accommodate growth. • Potential for new development to deliver community infrastructure was assessed. • Impact on Welsh language is considered

Health and well-being	Provide a clean, healthy and safe environment for all	<ul style="list-style-type: none"> Capacity of public services near the site was assessed to check they could accommodate growth. Safe road access is assessed
Housing	Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs	<ul style="list-style-type: none"> Sites are found to meet the identified housing allocation requirement.
Effective Protection of the Environment		
Biodiversity	To maintain and enhance the diversity and abundance of indigenous species in the plan area	<ul style="list-style-type: none"> Sites of known nature conservation importance are avoided Potential for impact and mitigation on biodiversity is assessed
Landscape character	Ensure special and distinctive, natural and historic landscapes and their specific features are conserved and enhanced	<ul style="list-style-type: none"> Sites of known landscape importance are avoided Potential for impact and mitigation on biodiversity is using LANDMAP
Built environment	Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards	<ul style="list-style-type: none"> Not assessed.
Cultural heritage	Conserve and enhance the built and archaeological cultural heritage features of the area	<ul style="list-style-type: none"> Potential for impacts on historic environment and archaeology are assessed Impact on Welsh language is considered
Prudent use of natural resources		
Energy	Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources	<ul style="list-style-type: none"> Not addressed
Land	Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant	<ul style="list-style-type: none"> Previously developed land was prioritised for development, subject to other sustainability constraints Minimum densities of 30dph was used to assess site yield potential (higher in more accessible locations) Potential for adverse ground conditions is assessed
Water	Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding	<ul style="list-style-type: none"> Water infrastructure capacity was identified for each sites. Flood risk on site is assessed

Air and Atmosphere	Reduce all forms of air pollution locally and globally to reduce air pollution and improve the atmosphere	<ul style="list-style-type: none"> • Potential for mixed use development and co-location is considered to reduce travel impacts. • Access to services is part of site assessment.
Minerals and primary resources	Safeguard non-renewable resources and promote reuse of primary resources	<ul style="list-style-type: none"> • Proximity to existing minerals workings is considered
Maintenance of high and stable levels of economic growth and employment		
Economic diversification	Encourage diversification of the economic base in rural and urban areas	<ul style="list-style-type: none"> • Employment sites in urban and rural areas area assessed.
Employment access	Ensure that there is good access for all to employment	<ul style="list-style-type: none"> • Accessibility scoring of sites was undertaken, including distance to public transport and local shops.
Encouraging investment	Emphasise and increase factors conducive to wealth creation and attractiveness to investors	<ul style="list-style-type: none"> • The compatibility of housing with existing uses are assessed so that they not harm continued operation, including employment sites. • Sites to meet identified employment in a variety locations and sizes are assessed

7.28 A further essential aspect of site selection was making sure the chosen sites were actually available for development. Ensuring the sites will actually be delivered is a critical aspect of creating a sustainable plan. If site allocations are unreliable then achieving the desired growth options will be compromised, potential adversely impacting on delivering a distribution of growth compatible with sustainable development.

7.29 It is not the role of this SA to query whether the conclusions of these sustainable appraisals of sites are accurate, and it must be assumed that there was a thorough test of sites. However, the method appears thorough and more comprehensive than the previous site selection process.

7.30 The site selection process also allocates sites either to a timeframe within the plan period or identifies them as contingency sites. Contingency sites are all greenfield rather than brownfield, that will prioritise previously developed land. However, no indication is given on the other criteria for making a site a contingency rather than an allocation, for instance based on the roles and functions of settlement and the need to prevent oversupply of development. It is important that contingency sites are chosen to meet the needs of individual settlements, rather than chosen for being greenfield rather than brownfield selection processes.

Summary

7.31 The previous SA raised several points in the summary of options that remain relevant to preferred option in the Deposit LDP.

- 7.32 The SA concluded that overall, it appears that the preferred options for the strategy would continue to guide development in the plan area in a similar way to what is already happening, with a focus on the key coastal towns and villages.
- 7.33 Monitoring, and a review strategy, for both housing land take up and employment land take up will be necessary to support sustainable commuting patterns. The reason for this is that if there is an oversupply of employment this could lead to an increase in commuting from surrounding local authority area to Conwy County Borough. Or, if there was an oversupply of housing this could lead to an increase in commuting from Conwy County Borough to surrounding local authority areas. Either situation is undesirable, particularly where the only realistic travel option is by car.
- 7.34 The sites allocated for development have changed quite substantially several times during LDP preparation. The Council will need to make sure the evidence that supports the choices made is sound, including the selection of preferred sites from alternatives based in part on sustainability issues. Furthermore, the selection of sites and contingency sites could acknowledge in more detail how these fit with the role, function and needs of each sub-area.
- 7.35 Background studies also show that the lower level of new homes, identified for the plan period, may not meet the affordable housing needs in the County Borough. This will have sustainability implications for communities and the local workforce, potentially exacerbated if there is a mismatch of jobs to new homes.

8 Sustainability appraisal general comments

- 8.1 The purpose of this section of the SA is to look at the LDP as a whole and assess whether the general format and approach to making the plan will help deliver sustainable development. The focus is on the structure and form of the Deposit LDP, rather than the content.
- 8.2 The suitability of any planning application will be determined by the policies of the LDP. The coverage of sustainability issues in LDP is important, but to achieve any of the desired benefits policy and strategy need to be written in a way that is easy to implement. Clear, concise and unambiguous policy and justification is essential in helping everyone who will use the plan understand what is expected from development. This means an LDP that is easier to use should lead to better planning applications and more consistent decision making, resulting in the more successful implementation of sustainable development. Therefore, considering implementation is an essential part of the SA process.
- 8.3 The strategy and policies need to be presented in such a way to give reasonable certainty to those using the plan on what type of development will be permitted in which location, and to what standard. This should include all those who will need to use the plan to submit an application, make decisions on an application and respond to an application. It could include the Council's development management team, developers, businesses, the public and local interest groups. Policies need to be presented to be unambiguous, demonstrating a cohesive approach to development in which the tools by which decisions on applications will be made are straightforward and readily identifiable.
- 8.4 The Conwy Deposit LDP contains much that shows a clear intention towards achieving sustainable development, from the strategy to detailed policies on renewable energy and sustainable construction. However, there are elements of the LDP that may mean that it is not as simple to use as it could be.
- 8.5 The LDP should re-consider how strategic policies are presented separately from development control policies. The strategic policies should set the overall framework for development. This will include the growth levels of housing and employment, the spatial distribution strategy i.e. Urban Development Strategy Area focus, and restraint on development outside settlement boundaries. This could also include other policy matters that are fundamental to delivering the preferred strategy, including those affordable housing and density, and those on design and sustainable construction.
- 8.6 The development control policies would then have the role of guiding the implementation of development set through the strategy, to maximise sustainability benefits and mitigate potential adverse impacts.
- 8.7 This greater clarity of approach could help avoid the current duplication of policy parts that currently appear in the LDP. Examples of where the LDP could benefit from some simplification are in the strategy policy (DP/2) and the housing policy

(HOU/1), and again in HOU/1 and the affordable housing policy (HOU/2). These policies and their supporting text repeat the same issues, each in slightly different ways. This duplication could impede understanding of the strategy and hinder delivery of development as it is intended by potential providing conflicting advice. It would be preferable to have one clear policy on the strategy and then a further policy on affordable housing.

- 8.8 In order to help successfully deliver sustainable development it is necessary to make sure that the approach set out in the development plan is clear and understandable for all users.
- 8.9 This approach could help address a further issue with the LDP, and that is to reduce the **number of policies**. The appraisal of policies in Appendix 1 notes where some policies could be combined or deleted as they add little overall to the plan. Policies should set the criteria by which applications will be judged. Therefore, policies that do not perform this function could be deleted, including the policies at the start of each section that simply cross-references other policies, refer to national policy or relate more to delivery and implementation mechanisms.
- 8.10 Reducing policy numbers to help make reduce the potential for misunderstanding and conflicting advice, and create a more succinct and easy to use plan.
- 8.11 The guidance in The LDP Manual (Assembly Government, June 2006) specifically refers to plans being more 'strategic, concise and distinctive'. This includes moving away from policies that detail with area specific matters, stating:
- 'producing more concise plans, eliminating overly specific and detailed policies...'*
(LDP Manual section 2.3.5)
- 8.12 The LDP Manual sets out that the LDP is *not a detailed development control manual* (7.3.3). The bullet points repeat LDP Manual advice on policy and LDP drafting that are relevant to reducing the complexity of Conwy LDP:
- *policies should be positive and succinct*
 - *supporting text can be amalgamated and should be restricted to matters that are fundamental to justifying policy*
 - *unnecessary policies should be excluded*
 - *a policy should not be sought for every eventuality*
 - *criteria based policies should be included against which windfall and very small sites can be assessed. Definition of a very small site may require thresholds to be defined, probably separately for urban and rural areas.*
(7.3.3)
- 8.13 To help reduce the number of policies in the plan it may be suitable to consider using more strategic generic policies that avoid the need to duplicate development control criteria for several separate types of development. Alternatively, where there are generic policies criteria should be removed from the other policies that duplicate them, for instance sustainable access.

- 8.14 For some policies it appears that the LDP is aiming to be too specific, trying to identify all types of development and then set out a policy to respond to it. However, it is not possible to plan for every eventuality and therefore it may be more useful to focus on fewer criteria based policies that provide the tools for making decisions on the suitability of any type of development. This is more in line with the streamlined approach to policy making advocated by the WAG.
- 8.15 Wording of policies should help avoid ambiguity, using terms such as 'have regard to' can lead to inappropriate applications that have the potential to cause adverse sustainability impacts.
- 8.16 It is equally important to keep reasoned justification to support policies succinct, simply to make an easier to use plan. For instance, the introduction, strategy and housing and employment sections contain some sections that are repetitive. There is some repetition of reasoned justification in particular in the earlier sections of the plan, including the introduction, description of the strategy, development principles and housing and employment sections.
- 8.17 This leads to an issue that is immediately apparent when reading the plan and that is the length and may mean that it is not used effectively, particularly by non-planning professionals. This may lead to submissions of inappropriate planning applications, where the complexity of the document meant people were unable to identify what information an application should contain and identify all the policy criteria their proposal would have to meet.
- 8.18 This is not to say that the policies are not promoting sustainable development, but in some instances the LDP is not as usable as it could be. This may lead to misunderstanding of policy and slow down delivery of development, or mean that tools are not in place to ensure development is implemented in line with sustainable development objectives of the LDP.

9 Sustainability appraisal of the spatial strategy – including distribution of development policies

Introduction

- 9.1 This section of the Sustainability Appraisal Report considers the sustainability impacts of the spatial strategy of the LDP.
- 9.2 Getting the strategy right, in terms of contribution to sustainable development, is essential in helping to create a sustainable LDP that will shape the future pattern of development and contribute to more sustainable ways of living.
- 9.3 One of the principle roles of a spatial strategy is to deliver more sustainable development that reduces reliance on car travel. This can be done through policies that support public transport improvements and walking and cycling routes. However, more important than this is a spatial strategy that sets a pattern of development that reduces the need and distance travelled in the first place. This includes frequency and number of trips and access from homes to jobs, schools, shops, health services and other community facilities.

The Conwy Preferred Strategy

- 9.4 The preferred strategy for the Conwy LDP is to focus the majority of new development in the Urban Development Strategy Area (UDSA), made up of all of the coastal towns from Kinmel Bay to Llanfairfechan, as well as the rural town of Llanrwst. The strategy is for 85% of housing and employment development to be directed to the urban area, these towns will also be the focus for new retail development.
- 9.5 The rest of the plan area, identified as the Rural Development Strategy Area, is intended to have much lower levels of development, and much of the new housing development will be for affordable homes to meet local needs.
- 9.6 This broad split of development is compatible with sustainable development objectives. This includes:
- **Access to services:** focused development on existing towns is likely to help promote better access to everyday services, although rural development can lead to people needing to travel further to get to schools, jobs, shops and health services
 - **Communities:** new development for local needs in the rural area should help to support a demographic mix in rural communities. This can help counteract the aging population of these areas, caused by aging long-term residents, retirees moving into the area, fewer homes available due to demand for second homes and young people being priced out.
 - **Housing:** this spatial strategy allows for new housing in rural areas to be developed to specifically meet local needs, helping to provide affordable homes where they are needed

- **Air and atmosphere:** the urban focus is more likely to help contribute to development that can be accessed by car alternatives, as there are opportunities for better links between homes, jobs, shops and services. Reduced car use can have benefits for air quality, including climate change
- **Economic issues:** the coastal belt is the most popular location for economic growth in the County Borough. This distribution of development should help promote the continued focus of development in this area.

9.7 Any new development also has the potential for adverse impacts on the landscape and nature conservation assets of the area. The risks of adverse impacts on these assets is increased by the high quality of much of the countryside around the main towns, including sites designated as being of international importance for nature conservation. Parts of the UDSA are also at risk of flood, due to the coastal location and low-lying landscape. Therefore, the Council need to make sure allocations avoid adverse impacts and protect the natural environment.

Sub-regional distribution

9.8 This rural/urban split for housing is broken down further using a settlement hierarchy based on the sustainability of settlements, and the grouping of the larger towns into functional units.

9.9 The urban development area is split into five units or functional areas. These are:

- Llandudno, Llandudno Junction and Conwy
- Abergele, Towyn and Kinmel Bay
- Llanfairfechan and Penmaenmawr
- Colwyn Bay and Mochre
- Llanrwst.

9.10 The table accompanying HOU1 of the Deposit LDP breaks down housing growth for the County Borough into these five areas. Table 9.1 uses the data in HOU1 (not including empty homes and school modernisation figures as these are not spatially apportioned) to give an idea of how the allocations of the LDP would change the proportion of development any settlement would receive.

9.11 Column 2 shows the distribution of the total housing development in Conwy that is likely to occur without the influence of the spatial distribution strategy, including development from completions, permissions and windfall. This is similar to a business as usual approach. Column 1 includes the allocations. The difference between the two columns shows the influence the LDP allocations could have on the distribution of housing development.

9.12 Column 3 shows the proportion of total development in an area that is a result of new allocations.

- 9.13 The table shows the majority of development is directed to the largest urban areas of Conwy, in the Llandudno functional area, and the Colwyn Bay functional area. These towns already are the focus for much of the jobs and services of the County Borough. Therefore, this distribution is improving access by making sure new housing is near jobs, schools, community services and shops. The distribution also follows the Wales Spatial Plan role for these areas to the focus of development.
- 9.14 However, the difference between columns shows a slight departure from previous patterns of development. Development is now distributed more widely around the County Borough. The locations that are to be the focus of greater than a proportional amount of housing are the Abergele and rural areas. Areas with less development are Llandudno and Colwyn Bay. New allocations at Llanrwst also mean the LDP is aiming to put more development in this town than before.
- 9.15 The sustainability of this approach is not clear, as there are already many unimplemented permissions in several areas. This is shown in Column 3 where the proportion of development from new allocations in some areas is very low and in others very high. In some areas there are already a large proportion of the homes committed or constructed. For instance, almost half of those in the 'Conwy' area are completed or have permission. It will be essential to make sure that this housing is delivered, in order to implement the chosen strategy. And that a high level of uncompleted commitments does not indicate that the market in an area has stagnated as development is no longer financially viable, risking implementation of the plan. It is vital to have monitoring and review systems in place to help make sure the LDP is implementing the spatial strategy set out in objectives. Monitoring is also essential to manage release of contingency sites.
- 9.16 What is not clear, and a matter raised as part of the previous appraisal of the Preferred Strategy, is the reasoning behind the spatial distribution of allocations, shown in table 9.1 (and HOU1 of the LDP). The LDP appears to treat the UDSA as a single unit, with allocations distributed to available sites within it, regardless of their location. For instance, it is not clear in the spatial strategy the purpose of the proposed distribution. For instance, is high growth in Abergele intended to meet and existing shortfall, to deliver regeneration or to support economic policy, or is it simply because land is available.
- 9.17 It is important that the housing growth distributed across the Borough is distributed to meet the needs of each functional area, to ensure the objectives for individual area are met. This includes ensuring that the right level of housing and employment is directed to different functional areas within the Borough to meet specific needs in those locations. Development needs to be delivered that is compatible with principles of sustainable development, such as creating good places to live and reducing car reliance. Therefore, the Council needs to be confident that the level and distribution of development is will improve access to locations which are near jobs, schools, community services and shops and deliver other benefits such supporting town centres.
- 9.18 In providing the right levels of housing to the right location, the advantages include:

- providing housing to match employment need;
- minimising commuting for work; and
- improving access to schools, community services and shops.

9.19 In addition, the strategy does not make clear how new development will be delivered in a way that supports creation of sustainable communities. For instance, allocated growth for Abergele is substantial meaning it is essential that this growth is matched by an increase in local services, such as schools, shops and public transport. However, the LDP is not clear on how it will secure the delivery of a mix of uses as part of larger development sites. This will need to be achieved through implementation of appropriate policy or putting in place design briefs for larger development sites, this is elaborated on in paragraph 10.34.

Table 9.1: Proportional split of housing development around the Conwy Urban Development Strategic Area (NB totals include rural sites)

	Proportion of housing to each area:		
	Column 1: Committed, windfall and allocations (total for borough 5821)	Column 2: Committed and windfall development (total for borough 3494)	Column 3: proportion of total that are new allocations for each strategy area
Llandudno, Llandudno Junction and Conwy	29.0%	39.0%	19.7%
Abergele, Towyn and Kinmel Bay	19.5%	9.5%	70.6%
Llanfairfechan and Penmaenmawr	5.8%	8.1%	15.8%
Colwyn Bay and Mochre	26.0%	39.0%	34.4%
Llanrwst	5.1%	2.7%	67.7%
Rural	14.6%	14.7%	47.7%

Issues that may affect delivery of the spatial strategy

9.19 The quantity of development that remains to be allocated through the LDP is under half of the overall housing numbers. From a total of 6,350 homes, as identified in background paper 4 'Housing Land Supply' (August 2012), approximately 32% is already completed or has a planning permission, 34.2% is anticipated to come forward as 'windfall', and 33.8% from allocations. This shows that, based on the Council's figures, there is only a relatively limited opportunity for the allocation of sites through the LDP to influence the spatial strategy.

9.20 **Committed development:** A review of existing commitments of housing since the 2009 version of the LDP has resulted in a reduction of the overall quantity of

housing identified from these sources. In most of the sub-areas there are more windfall and allocations than completions and commitments, as would be expected as there are still over 10 years remaining in the plan period. However, there are exceptions including the 'Conwy' area where the levels from the two sources are quite similar, despite figures only be from the first 3 years of the plan period.

- 9.21 The higher proportional level of windfall and new allocations may mean that the LDP revised spatial strategy can have a greater impact on changing the development pattern in Conwy to create a more sustainable layout of jobs, homes and services than before. However, there is still only a limited change the LDP can make to the pattern of development in the County Borough. This is due to the existing number of homes in the area compared to the quantity the LDP will provide for.
- 9.22 **'Windfall' development:** The other constraint in pursuing a very different strategy is the quantity of homes that are expected to come forward on non-allocated windfall sites. This is just under a quarter of the whole housing supply (of 6,350 homes). The actual number of homes from this source has increased approximately twofold from the 2009 Deposit LDP. Windfall sources have now been included for the villages and rural area, and five times as much in the Conwy UDSA.
- 9.23 As such a large amount/proportion of development is expected as windfall, the suitability of sites for development will need to be determined as part of the development control process. This raises the importance of the LDP having in place a set of policies clearly setting out where development will and will not be permitted in line with the spatial strategy. In addition, a set of generic criteria based policies are needed that can be used to make sure development will protect and improve the built and natural environment and people's wellbeing. The appraisal of policies shows that successfully achieving this may need changes to the strategic policies to improve their clarity. The SA also makes recommendations for improving some of the development control policies, to ensure the protection of the natural environment and delivery of high quality development.
- 9.24 Monitoring and review of this windfall site delivery will be needed to make sure that it is delivering development in the quantities anticipated and not counteracting a sustainable strategy.
- 9.25 Windfall may come forward at a reduced rate, as the candidate sites process may result in sites being allocated, that under the old system would have only come forward as windfall. This may therefore give an over estimation of the quantity of housing that will come forward from this source. To get a more accurate picture of this supply a review of windfall rates may have been suitable.

Empty Homes Strategy

- 9.26 The proportion of development that is expected to come forward from empty homes has increased in the Focused Changes LDP. This source of housing is

supply is sustainable, making use of existing buildings and therefore demand for additional land and resources. However, as with other issues on the reliability of evidence the Council will need to be sure this is a reliable source of supply and these homes being brought back into use to achieve a net gain. It is not clear if this source of housing would lead to a double counting of housing figures as will already be accounted for and therefore should not go toward meeting overall housing requirements set for the borough.

Employment strategy

- 9.27 Around 85% of new employment development is anticipated in the UDSA. This approach is compatible with locating development in sustainable areas, where there is good access by a variety of types of transport. Fifteen percent of employment development is directed towards the Rural Development Strategy Area. New employment will need to be supported through the extension of public transport, walking and cycling routes, to make sure new jobs are accessible to all.
- 9.28 The growth and development strategy for employment consists of a number of elements. These are identification of:
- employment land to meet predicted population change
 - employment land to reduce out-commuting levels
 - new employment allocations to meet general demand
 - employment land allocations to be used in contingency circumstances.
- 9.29 The total employment land requirement including contingency adds up to 39.5ha of employment land or over 4,565 jobs. This is a substantial amount of land based on past rates of employment development that would only require 24ha over the plan period. Even with no contingency, 11.5 ha of employment land is being newly allocated in the urban area (with a further 3.1 in rural locations). A sustainability benefit of a higher employment allocation than may be needed is it does allow some flexibility in the market. This means that investors have a choice of site to meet their specific needs, ranging from small rural sites to large industrial parks, this may help secure economic investment.
- 9.30 Between the 2011 Deposit plan and the revised plan the number of jobs to be delivered up to 2022 has greatly reduced, from 6,720 to 4,565. The Sustainability Appraisal is unable to comment on whether the right number has been chosen for the Borough. However, the Council need to be confident that the right number of jobs has been derived, to match the housing growth for the area and reduce out-commuting from Conwy Borough.
- 9.31 One of the greatest risks of allowing a range of sites for employment development is that it is not possible to predict in advance which sites will come forward. The SA identifies that this may lead to difficulties in establishing a sustainable pattern of growth where housing and employment can be located together to support local employment and reduce the need to travel. Therefore, there is the risk that this approach will increase the need to travel by car, and create 'commuter towns' often characterised by lack of community cohesion and character.

- 9.32 One of the greatest changes to the employment allocations policies is the quantity of employment land that is allocated for development, as well as the way the allocation has been split. The reduction in the allocation, from the 2009 Deposit to the current levels is supported by the appraisal as helping to create a more sustainable place. The 2009 approach allocated so much land that it may have been difficult to control its delivery in way that is compatible with creating more self-contained places that make best use of land.
- 9.33 In order to present a clear argument for employment land allocation the way strategy needs to be clearly defined and straightforward to implement. The split of the employment land requirements into 'predicted population change' and 'to reduce out-commuting' appears not to differentiate in terms of the site allocations of types of employment. It is very likely that in practical implemented the two types of demand are exactly the same. Therefore, nothing is gained from the split into two and may only serve to complicate the plan for those who wish to develop employment sites.
- 9.34 The use of contingency sites is also queried with 3.5 additional hectares available for development. How employment contingency land is released is assessed in paragraph 9.50-9.62 of this section.
- 9.35 The greatest proportion of new development is allocated, or has been constructed or committed, in the Llandudno UDSA. In this area there are around 5.6ha of new allocations. Around Abergele is another area with a high proportion of employment focus. There are 7.5 ha of new allocation here.
- 9.36 In Conwy the separation of employment and housing may be less of an issue than in other plan areas. The strong east-west link provided by the A55 and coast roads, and the rail line with frequent stations, means that public transport can be made a truly viable option for many people to get to work. In addition, development in the Abergele and Kinmel Bay area is also heavily influenced by the Denbighshire coastal towns and many of the relationships of housing and employment will be with Rhyl rather than Llandudno or Colwyn Bay.
- 9.37 However, to achieve more sustainable development a more compact urban form is favoured, with town and villages being as self-contained as possible. It is not always clear how the LDP will achieve this especially as several of the UDSA and many of the Tier 1 Main Villages have no allocations of existing committed employment development.
- 9.38 Also, to help reduce car travel it is vital that delivery of employment development in this location is not only matched by public transport improvements but controls on car parking.

The rural area

- 9.39 The strategy for the rural area is compatible with achieving more sustainable development. As the SA notes in paragraphs 9.40 allowing housing delivery in the rural areas to help deliver AHLN could have substantial benefits for local communities, such as helping to meet sustainability objectives relating to community cohesion and character, housing and wellbeing.

- 9.40 The strategy states that around 15% of all new employment development will be in rural locations. This, alongside the AHLN policy, could help support rural enterprise and jobs to meet local needs away from coastal Conwy.
- 9.41 The scale of development that occurs in the rural area needs to be compatible with this location. Rural villages have fewer local services and poorer public transport connections than urban areas, so development in these locations is more likely to be very reliant on using a car to meet many day-to-day needs. Housing or employment development that relies on car access may have adverse sustainability impacts, not only relating to pollution and climate change, but also can create social isolation for those who do not or cannot travel by car. It is therefore essential that the scale of new development be monitored by the Council to avoid unsustainable development patterns emerging. Part of this is making sure all new employment development in rural areas is compatible with the location and the scale suitable to serve a local function.

Affordable housing

- 9.42 The strategy seeks to deliver around a large number of affordable homes for local need (AHLN) over the plan period (85% in the UDSA and 15% in the Rural Development Strategy Area (RDSA)). The strategy set out in DP/2, HOU/1 and HOU/2 shows how this is to be achieved through requiring a proportion of development on each site to be AHLN. 30% of all housing must be delivered as AHLN or through financial contribution. In rural villages from Tier 2 Main Villages, Tier 1 Villages, Minor Villages and Hamlets 100% of new homes are intended to be AHLN. However, the policy provides a caveat for developers to provide market housing where it is deemed essential to assist the delivery of affordable housing and should be supported by the completion of a Viability Assessment Pro Forma.
- 9.43 Even if the 30% requirement is secured in all new housing this will only deliver 1,905 affordable homes, or 2,095 if all contingency sites are delivered. Background Paper 37 on the revised growth figures suggests the higher yield is necessary to help meet housing needs. The Joint Local Housing Market Assessment provides a general view that the Conwy County-wide affordable dwellings requirements are far greater than those identified in the plan.
- 9.44 The 2009 Deposit plan had 50% target for AHLN, in theory this could have delivered a higher proportion of affordable housing. However, this high goal may have adversely affected the viability of all housing sites stalling development, leading to greater problems of housing availability. A further risk of high AHLN targets is that these costs mean that developers cannot make other necessary financial contributions to support infrastructure improvements, schools, community facilities and more sustainable construction techniques. This could result in adverse sustainability impacts and impact on the accessibility and communities of villages. The revised lower target may be more likely to achieve housing to meet people's needs.
- 9.45 However, as stated in paragraph 9.39, the revised affordable housing policies now contain a caveat to introduce market housing where 100% affordable housing is not viable on schemes within rural locations, where the policy requires

100% affordable housing. The Sustainability Appraisal appreciates that there are times when sites may not be viable, but this should be assessed on a site by site basis. The policy should remain strongly worded to retain a requirement of 100% affordable homes in rural locations and the caveat removed from policy wording. The wording instead is placed in supporting text to provide in exceptional circumstances when market housing could also be accepted.

- 9.46 If the LDP is successful in maximising the delivery of AHLN it could have major benefits for local communities. Social sustainability benefits could include making it possible for families to remain in rural areas, and help protect the viability and vitality of villages by providing a social and demographic mix of residents. This will help counteract the decline of some rural areas that results from an aging population of long-term residents, retirees and second homes that can be empty much of the year, and young people priced out of housing. It could also help provide a local workforce to protect the rural economy.
- 9.47 The 2010 Deposit Plan also contains more detail on securing AHLN and securing the long-term maintenance of these homes for the use they are constructed for. This includes details of:
- how 'local need' is defined
 - what proportion (if any) is for intermediate affordable housing
 - securing housing as affordable in the long-term
 - managing the delivery of affordable housing from financial contributions, and
 - the quality of new homes.
- 9.48 This additional material should help to ensure that the right type of development is secured and it provides a housing source for the long-term. A detailed SPG should help to better secure AHLN delivery and it's long term maintenance.
- 9.49 To ensure that AHLN is delivered and occupied by the right people it may be suitable that the majority of these homes are controlled by a Registered Social Landlord or Housing Association. Maintaining affordable stock as affordable in the long-term will also be essential, the method for achieving this is set out in the supporting text. The principles set out in the text need to be rigorously applied to all affordable housing in the County Borough. Furthermore, they need to be clear in how they are applied, for instance how the Local Connection Occupancy Cascade is applied.

Phasing and Contingency Release

- 9.50 A central aspect of the Deposit plan is the need to phase site release in order to deliver the greatest opportunities for securing development to meet needs in the County Borough. The phased release of land also allows sustainable development objectives to be realised. For example phased release of housing and employment land can:

- help prioritise sites that can deliver the greatest benefits for sustainable development, such as on previously developed land, in accessible locations or in areas in need of regeneration
- help match the deliver of economic growth with housing growth, so as to help create more sustainable patterns of development that reduce work commuting
- help to ensure essential infrastructure is in place prior to development delivery, aiding the creation o f ore sustainable communities as well as protecting the natural environment and resources.

9.51 Two types of phasing are used in the LDP. One type simply phases the delivery of allocations to make sure infrastructure is in place and to reflect their availability. How these sites are phased is clearly set out in an appendix of the LDP. This phasing covers issues such as:

- flood risk management
- utilities infrastructure improvements
- access improvements
- availability for development

9.52 However, there are also sites phased as 'contingency' to come forward if other land is required for development. Contingency is for:

- 665 extra homes on 10 additional identified as set out in background paper 41 'Contingency' (August 2012). However, the overall contingency number to match the housing requirement, as set out in policy HOU/1 is 635 extra homes;
- 7ha additional employment land on two sites.

9.53 The LDP strategy is employment led, with the Council wishing to improve the economy of the area by encouraging new job growth. A strong economy is part of delivering sustainable development by ensuring the long-term financial security of residents and the social benefits that come from employment. To achieve this aim is essential that employment growth is matched to housing growth in any area. Therefore, contingency release if targets are not being met may be suitable in achieving sustainable growth.

9.54 If housing and employment levels become mismatched this can have adverse impacts on achieving sustainable development, ranging from increasing housing prices to increasing the need to travel. Lack of housing can also adversely impact on objectives for economic growth by not providing a suitably mixed workforce to match the demands of all types of new jobs created.

Housing sites

9.55 The background paper 41 (August 2012) on contingency identifies that housing sites should only be released when identified a trigger point have been reached and it can be shown that housing objectives are not being met. The trigger point includes

- that annual housing completions over 3 consecutive year period are consistently 15% or more above or below the annual housing requirement; and
- the Council is unable to achieve a five year housing land supply, the Council will release a site.

- 9.56 The Sustainability Appraisal agrees that there should be a way to monitor when contingency sites should come forward. Relating the trigger point to the five year land supply means it provides a clear basis for the contingency arrangement and release of sites.
- 9.57 It is important that criteria is set out to justify which sites are released, in terms of the location, capacity and deliverability of the contingency sites at the time of considering releasing sites for development. Where there is under-provision sites need to be in the right location and priority should be given to where housing is more needed and not coming forward. The site needs to be able to provide the right number and type of housing for that location, as well as be deliverable within the anticipated time period.
- 9.58 Similarly, where sites need to be bought forward to match demand the choice of sites needs to be managed to ensure they are in a right location to support sustainable patterns of growth, especially as some sites are quite large will need to deliver development that supports sustainable communities and accessible services.
- 9.59 More detailed criteria on site release (including location) are set out within background paper 41 (August 2012). However, it might be more helpful to future developers if the triggers for contingency site release are set out in the supporting text within the LDP.
- 9.60 It is essential that the way that these contingency sites are bought forward for development is made clear in the LDP. This is required so that they can be managed in a way that does not undermine the chosen spatial strategy and risk meeting sustainable development objectives. In addition, it will be part of providing a sound plan.

Employment sites

- 9.61 The background paper 41 (August 2012) on contingency states that the two identified employment sites, one in Abergele (UDSA) and one in Dwygyfylchi (rural location). The background paper 41 (August 2012) on contingency states that the two employment sites should only be released when a trigger point have been reached and it can be shown that employment objectives are not being met. The trigger is when the annual rate of employment land take-up is less than 1.5ha per annum or greater than 10 hectares per annum for 2 or more consecutive years.
- 9.62 In terms of the sustainable release of sites it would appear that the criteria is suitable to control release of sites. However, the trigger would mean that it is likely that these sites will need to be delivered over the plan period, especially in the current low growth economic climate.

Integrating the strategy into the LDP

- 9.63 As part of making a more concise and understandable LDP it may be suitable to change the way the strategy is presented in the document. In the Deposit LDP the discussion of the strategy is a stand-alone part of the LDP. For clarity the SA would suggest that strategic policies are included in this section. Therefore, amended versions of policies such as, DP/2, DP/3, HOU/1, HOU2, EMP/1 and EMP/2, and any others that deal with strategic issues would be part of the strategy.
- 9.64 This would avoid the need to repeat sections of the reasoned justification and policies on why the strategy has been chosen, the role of the different towns and sub-areas, the rural / urban split, economic strategy and the quantity of development and AHLN delivery.
- 9.65 The purpose will be to set out the framework against which all development would be judged at the start of the LDP. With the development control policies providing the detail necessary to avoid adverse impacts and maximise sustainability benefits.

10 Sustainability appraisal of the topic chapters

- 10.1 This section of the Sustainability Appraisal (SA) Report summarises the findings of the sustainability appraisal of the topic chapters of the LDP. These are:
- principles determining the location of development
 - the housing strategy
 - the economic strategy
 - tourism
 - community facilities and services
 - the natural environment
 - cultural heritage
 - sustainable transport
 - minerals and waste strategy.
- 10.2 The individual policy appraisals are shown in Appendix 1. The appendix should be read in conjunction with this section of the SA report to get a better understanding of the likely implications for sustainable development of the policies and for detailed recommendations on how the policy could be altered to improve sustainability performance or mitigate impacts.
- 10.3 The SA not only provides an assessment of the coverage of sustainability appraisal issues by the LDP and policies but also looks at the way these are presented. The usability of policies is inseparable from their sustainability content, if it is not clear how a policy can be implemented, for reasons of clarity and certainty on how decisions will be made, they will not be effective in delivering sustainable development even if this is the intended outcome. Therefore, the SA does include some suggestions on where policies or the LDP could be made clearer.
- 10.4 Strategic matters raised in the policies, such as the distribution of growth, affordable housing, is covered in section 9 of this SA report on the spatial strategy.
- Sustainability appraisal of ‘Principles determining the location of development’**
- 10.5 The policies of this section include the strategic principles by which the location of development will be determined. Issues covered by policy DP/2: Overarching Strategic Approach is covered in detail in the spatial strategy section of the Report.
- 10.6 This section contains many elements that demonstrate the Council’s commitment to delivering more sustainable development in Conwy. This includes the spatial development strategy to focus most of the development in the urban coastal part of the County Borough, and still allow growth in the rural area to meet local needs.

- 10.7 Policies covering issues such as good design, including sustainable construction principles, and criteria that will have to be met by all development, have the potential to help deliver more sustainable development in Conwy.
- 10.8 The strategy of a plan has a role in setting out the principles that will guide development of strategic sites. The Colwyn Bay Masterplan is mentioned in the text and the SA does comment that there may be role for more detailed policy criteria for delivering an integrated and sustainable scheme at this site.
- 10.9 The SA does identify that there may be some unnecessary repetition within this section of the Deposit LDP. As section 8 of the SA report identifies, ensuring clarity of policy by avoiding repetition could have advantages in getting development delivered in a timely way to that corresponds to sustainability principles.
- 10.10 The SA does suggest that some policies could be revised or integrated into other policies, and in some circumstances deleted.

The housing strategy

- 10.11 The first two policies addressing the location of new housing allocations and the delivery of affordable housing are discussed as part of the spatial strategy for Conwy (section 9).
- 10.12 The policy appraisal of the housing policies raised some issues that could have an impact on delivering sustainable development in Conwy.
- 10.13 Section 9 contains concerns over the management of contingency sites in the LDP. Policy HOU/3 could be expanded to address this issue for housing allocations, adding the policy detail necessary for successful implementation.
- 10.14 Policy HOU/4 sets out a proposed approach to managing the density at which new housing is built. Setting a minimum density of 30 dwellings per hectare (dph) could help in the more efficient use of land, by reducing the quantity of land that is needed to deliver a given number of new homes. Higher densities can also help support better access to services and facilities, by providing a more compact urban form and by supporting a critical mass of population needed for viable local services, such as shops and bus routes.
- 10.15 The policy also sets a maximum density for development of 50 dph. Setting maximum densities, particularly as low as 50dph, is not compatible with sustainable development. Maximum densities of only 50 dph would miss opportunities to make the most of land in very accessible locations that can help meet SA and LDP objectives of more sustainable travel. Instead of maximum densities the LDP should rely on policies on design and protection of the built and historic environment to make sure new development, whatever density, is compatible with its surroundings. The SA also suggests a minimum density of 50dph is used for more accessible locations, such as transport nodes, near train stations and in town centres,

- 10.16 Policy HOU/5 sets out criteria for delivering a mix of housing types on new development sites. There are sustainability gains of providing homes to meet a range of needs. However, a proportion of development should be built suitable for families, including as part of affordable housing development.
- 10.17 The SA supports the approach the plan takes to delivering Affordable Housing for Local Needs (AHLN), and this includes the use of exception sites outside rural areas. However, making sure the policy is clear will aid in delivery this type of housing, as would clarification of issues through an AHLN SPG.
- 10.18 However, as stated in previous sections, the revised affordable housing policies HOU/1 and HOU/2 now contain caveats to introduce market housing where 100% affordable housing is not viable on schemes within rural locations. The caveat should be removed from policy wording, to enable the policy to remain strong and maximise the number of affordable homes in rural locations.
- 10.19 Similarly, the affordable housing targets in policies should be worded positively, setting a target quantity (30%) that would be expected from development. It is then should be up to the developer in discussion with the Council to establish a lower level if financial viability is an issue, without the need to caveat it in policy. If necessary, caveats could be included in supporting text. Policies should also avoid precluding development achieving more than 30% affordable if this is what the developer want, for instance developments by Housing Associations.
- 10.20 Providing a home for everyone is an important part of delivering sustainable development, and this includes permanent sites for Gypsies, Travellers and Travelling Showpeople. Policy HOU/9 sets the approach to delivering a site to meet the needs of these groups. Criteria based policies are valuable where the need for this type of site is not yet know, as it allows site-by-site decisions on the suitability of new planning applications for this type of development. However, as with other types of housing, identifying sites through the LDP is preferable, showing the plan is recognising and making a commitment to finding sites for these communities.

Housing and employment sites

- 10.21 The review of the allocations has resulted in some substantial changes to the allocated sites from the 2009 Deposit to the 2010 Deposit, and then again to 2012. Many of the sites allocated in the 2009 and 2010 version of the Deposit have been removed and new ones allocated. Some discussion of this is shown in Chapter 9.
- 10.22 The quantity of housing allocated has also changed. The quantity of housing allocations has reduced since the previous version. This is unexpected as the actual quantity of housing the plan will be delivering has increased. However, this reflects the large overprovision of housing sites in the 2009 version, a situation that did not perform well in terms of creating a sustainable strategy.
- 10.23 The considerable change in housing allocations between the two versions does raise some concern that the previous version of the Deposit plan was not very robust. The allocations may have resulted in less sustainable outcomes, despite

the previous LDP's reassurance that they were chosen as suitable and sustainable.

- 10.24 The revised Deposit allocations are backed up by a new review of candidate sites and set out in Background Paper 21 – 'Site Deliverability' and Background Paper 35 – Justification for the Removal of the Proposed Development Sites Detailed in the Revised Deposit LDP of March 2011. The new site allocations, following their thorough assessment, should have greater certainty of coming forward for development than the previous set, and the set before that. The review of sites identifies how the site fits into a sequential test and the possible constraints that need to be overcome for delivery. This method integrates elements of sustainable development into site selection, and subject to controls over delivery may help in delivering more sustainable development.
- 10.25 A review of the appraisal of residential sites reveals that these allocations have the potential to have a range of sustainability impacts if not implemented sensitively. The phasing plan should help make sure that sites are only developed where infrastructure is in place to avoid adverse impacts.
- 10.26 The Council's appraisal of sites identifies where this may be necessary, some of which are summarised in the following paragraphs.
- 10.27 **Flood:** many of the sites in the appraisal are at partial risk of flood. Development on all these sites will need to take into account the view of Environment Agency Wales, and meet national guidance on development in flood zones. These sites are phased later to allow for suitable mitigation to be established, this will include the need to prepare Flood Consequence Assessment.
- 10.28 **Landscape, countryside and views:** several of the sites have been identified as having an impact on the landscape, countryside and views. This is not only greenfield sites but also includes some previously developed land and parts of some sites are in Special Landscape Areas. Some sites such as Dinearth Hall Farm, Rhos-on-Sea are in identified areas of sensitive landscape. There is also a rural site where impacts have been identified, land South of the Mill, Llanddulas, which may have a Special Landscape Character Area impacts. Several rural sites, including those at Llysfaen, are identified as important for openness by CCW. For almost all of the sites where impact of this type has been identified there is no explanation of how development will need to be delivered to avoid adverse effects, and therefore why the site is still suitable for allocation. All such sites will need to be clear on how sensitive design and screening to reduce adverse impacts.
- 10.29 **Biodiversity:** several of the sites are identified as having the potential to have an adverse impact on biodiversity. This includes sites in Kinmel Bay, Old Colwyn, Colwyn Bay and Towyn and rural sites at Llanddulas. Several sites, such as those around Llanrwst may support bats further study on implications of development is necessary. The LDP needs to demonstrate that it has fully taken into account potential impacts on these nature conservation sites, or put in place policies to make sure delivery does not harm these sites. Habitats Regulations Assessments should ensure there is no significant harm to European Nature Conservation sites.

- 10.30 **Historic environment:** a site at Top Llan Road, Glan Conwy is identified as potentially having an adverse impact on a listed building, how this will be managed as part of delivery is not addressed. At Smithy Hill, Llanfair TH there is also the potential for archaeological remains that need to be assessed prior to any development. The site at Penmaen Road, Conwy is in proximity of the World Heritage Site, the design and layout of new development would have to respect this setting.
- 10.31 **Accessibility:** the site appraisals show that all of the allocated sites have good access to at least a minimum level of services, and this includes shops, GPs, school, employment as well as access to higher quality centres by public transport or cycle. Access to services is a key consideration of site suitability. The allocated site in rural locations such as site 'North of Llansannan' may have inherent accessibility issues, with only a limited range of local services and jobs.
- 10.32 **Affordable homes:** the site appraisal identifies that all Council owned land will be developed for 100% affordable housing.
- 10.33 **Community facilities:** To avoid adverse impacts on the community, where a community use will be lost to housing it should be demonstrated there is no longer a need for the facility, or a comparable or better new facility will be provided elsewhere or as part of the new development. Where a mixed use development is being promoted additional policies or policy criteria should be included on how this should be delivered on the site
- 10.34 **Infrastructure impacts:** several sites have specific infrastructure needs, and development cannot proceed until these are resolved. Examples include sites at Abergele reliant on the new A55/A548 link road, and the water supply improvements need at Towyn and Llanrwst.
- 10.35 Many of the larger sites and regeneration areas would benefit from a Development Brief or other action plan covering the area, at the moment there is only one for Colwyn Bay. At the moment the plan makes very little reference to any of the sites being for a mix of uses, or to fulfil a specific demand (such as tourism).
- 10.36 To help deliver sustainable development and make sure sites are used in the best way all larger development sites should have an up-to-date plan for their delivery. Development briefs should cover a variety of matters that would help make sure that the site is delivered in as sustainable way as possible. Development briefs could include:
- Design codes for development, covering issues such as massing, building heights, densities and styles.
 - The mix of development and the indicative locations for different types
 - A possible urban layout or factors that would need to be taken into a consideration in defining layouts, such as movement routes or protection of features on site.
 - The anticipated developer contributions or funding, such as quantity of affordable homes, open spaces and infrastructure provision.

- Sustainable construction standards to be met, including sustainable urban drainage
- Low carbon energy for the site, including district heat and power.
- An implementation plan for delivery of development, in particular community facilities and infrastructure, including funding sources and delivery partners.

The economic strategy

- 10.37 The strategy should help to contribute to delivering sustainable economic growth in the plan area. The strategy is to focus employment growth in the urban development strategy area, with an anticipated 85% of new employment development here, and 15% in the rural area.
- 10.38 Employment growth focused in the urban area should help in creating development patterns that reduce the need to travel by helping people live near they work. Reduced car dependence can also be aided by locating new employment growth in locations that can be accessed by public transport, walking and cycling from where they live.
- 10.39 Allowing economic growth in the rural area may also help to allow rural enterprise to flourish, helping to support the continued viability of rural communities into the future.
- 10.40 The appraisal of policies does raise some issues in relation to the economic strategy. The policy appraisal recommends some clarifications or changes to policy to help ensure this type of development is delivered sustainably.
- 10.41 The first two policies of the section and the supporting reasoned justification, sets out the overall strategy to delivering economic growth in the Conwy through the allocation of land. The SA notes some possible improvements that could be made in the way the economic policies are expressed. This would help make it more clear what it is the policy is aiming for and therefore how it can be implemented.
- 10.42 The role of contingency sites for employment and how these should be managed is also raised in the SA. The sustainability implications of contingency sites is raised in section 9 of the SA. The SA makes particular reference to managing the release of these sites is other, non-allocated, sites are permitted for development on the urban periphery.
- 10.43 There are no policies on mixed-use sites. The SA notes that where these sites are in rural locations or in less accessible locations, it will be essential that the scale of development reflects the needs of the area. This is to avoid creating unsustainable travel patterns from new employment development.

Tourism

- 10.44 Tourism is a major employer in Conwy, therefore the LDP must help to secure the growth of this industry in a way that is compatible with the vision for the area, and for sustainable development. The sustainability appraisal of the Deposit LDP policies makes recommendations on how these policies could be adjusted to help

to deliver sustainable tourism. This includes, providing further clarity on where tourism development will and will not be permitted, in line with the spatial strategy. Policy DP/2 or EMP/1 are not very clear on how tourism applications will be handled, for instance where the preferred location for this type of growth will be, and if it is permitted outside developed areas.

- 10.45 Much of the tourism accommodation in the County Borough is in chalets, caravans and camping sites. The policy TOU4/5 seeks to restrict the future development on these uses. Controlling the spread of these sites could have positive benefits for the quality of the landscape and built development. This policy is also addressing a very detailed matter and instead it may be suitable to rely on policies on the LDP strategy, landscape protection, design, access and built environment quality to refuse unsuitable applications.

Community facilities and services

- 10.46 This section of the Deposit LDP covers matters relating to retail, and open space.
- 10.47 The retail policies set out a general strategy for permitting new retail development and protecting existing retail. The locations of retail development can make an important contribution to reducing the need to travel, with the need to prioritise development in accessible locations that do not rely on car travel, or where retail development in part of mixed use area.
- 10.48 The strategy for retail development could be improved to give greater certainty on where this type of development will be permitted and to what scale. Current wording is ambiguous, it is essential to make sure development of this type is suitable to its location and setting to support a more sustainable pattern of development that reduces the need to travel. Policy could set out the sequential tests to be applied to retail development to prioritise town centre development where possible, and restrict out-of-town retail development.
- 10.49 The policies also seek to protect the character of existing shopping zones, although in some circumstances allowing change of use if it will not harm the viability of centres. To aid this approach it may be suitable to specify what types of development are not permitted in these shopping areas. Policy CFS/6 aims to protect local shops, post offices, petrol stations, village/church halls and public houses from change of use, this type of policy is important in retaining the services necessary to support viable local communities and reduce the distance people travel for essential goods.
- 10.50 Protecting and delivering new open space is an essential part of creating sustainable neighbourhoods. Open space can help meet a variety of sustainable development objectives, including health and wellbeing, biodiversity and equality of access. Some clarification to wording could help make sure that these benefits are secured as part of all new development.
- 10.51 Policies also address allotment protection and delivery, which has positive implications for sustainable development. Allowing people space to grow their own food can have health benefits and environmental benefits due to local food production. Allotments are also an important biodiversity asset in urban areas. In

making decisions on permitted change of use of existing allotments, the long-term demand for these sites should be considered, taking into account possible changing demands in the future.

- 10.52 There needs to be suitable policies in place to help the delivery of new community developments as part of supporting sustainable local communities. This will include the use of developer contributions in delivering this type of development.

The natural environment

- 10.53 These policies address issues relating to the protection of the natural environment. This is an essential component of delivering sustainable development in Conwy. This includes making sure allocated sites are developed in a way that protects and enhances the quality of the natural environment, and helps in making decisions on the suitability of development on non-allocated sites.
- 10.54 National policy and legislation sets much of the framework to protect statutorily designated sites. The policies of the LDP can add to this to make sure more local considerations are taken into account, including the need to make sure locally important environmental assets are protected also.
- 10.55 The SA of policies notes that it may be suitable for the LDP to include more locally specific detail. This includes the need to recognise the setting of Conwy in an area of high environmental quality. For instance, the impact of development in Conwy on views from the Snowdonia National Park could be addressed. In addition, following the Habitats Regulations Assessment, it may be suitable for policy to refer specifically to the need to protect internationally designated nature conservation sites in and around Conwy. Even though these are covered by national policy there may be a need to refer to specific sites that are near locations of proposed or potential development, for example the Creuddyn Peninsula Woodlands need to be protected from development at Penrhyn Bay.
- 10.56 This section of the Deposit LDP also covers the need to use natural resources efficiently in new development. This is an essential component of delivering sustainable development, as the quantity of development anticipated to be delivered through the LDP has the potential to require significant resource use, in construction and operation. The policies of the LDP cover these issues and should help more sustainable development. For instance, the policy includes delivering more sustainable homes under the Code for Sustainable Homes. Some additional requirements could help further secure sustainable construction, including the need to show how developers will be expected to show compliance on matters relating to water use and sustainable construction.
- 10.57 The policy on onshore wind energy generation may help in encouraging this type of development the identified area of search. In implementing this policy the importance of securing more energy from non-fossil fuel sources should be recognised. Renewable energy is vital for a sustainable future, both in terms of mitigating climate change and responding to peak oil impacts. Therefore, within the search area criteria should leniently applied, especially in relation to landscape impacts of a local or County Borough-wide impact.

- 10.58 The sustainability appraisal also recommends that additional policies should be included to promote decentralised low carbon energy generation. Larger development sites, or groups of sites, should be identified that have the potential for on-site energy generation or where district heat and/or power networks could be established. This type of scheme could be included in development briefs for sites, as highlighted in paragraph 10.34 of this SA report.
- 10.59 Many parts of the County Borough are at risk of flood, this includes some of the allocated sites. Therefore, the LDP should include a specific flood policy on how these sites will be dealt with in the plan area. Making sure new development is not at unsuitable risk of flood is important for sustainable development, including protecting health and mental wellbeing.

Cultural heritage

- 10.60 Much of Conwy is of a very high historical and cultural heritage. Historic built heritage is a finite and irreplaceable resource, and therefore these policies are essential in its protection.
- 10.61 Policy appraisal notes that information will need to be available from the Council on the features of protected areas that need to be respected and protected. This will help developers demonstrate how their proposal takes these matters into account, and for development control officers to identify where improvements will be needed. Information of this type can lead to better applications and decisions and therefore, better protection of cultural heritage.
- 10.62 The SA queries the purpose of the policy CTH/4 and whether the criteria of this policy will help, or hinder, the protection of heritage assets in the plan area.
- 10.63 The Welsh language is essential to the character of many of the communities of the County Borough. Therefore, it is important that development does not have a negative impact on this heritage. The SA of policies notes that it may be difficult to identify how development can have an impact on the Welsh language, and it may be that some objectives of economic growth may be in conflict with this.

Sustainable transport strategy

- 10.64 Delivering a more sustainable transport network is essential in reducing the impact of development on the environment, society and the economy, including:
- mitigating against climate change
 - reducing air pollution
 - reducing health impacts
 - providing more equitable access, now and in the long-term
 - reducing congestion to reduce travel times for businesses and the movement of goods.
- 10.65 Achieving a modal shift away from car use by:

- making other ways of travel a more attractive and viable alternatives to driving
 - helping deliver a strategy to promote a pattern of development that should reduce the overall need to travel, including mix of uses and urban focus.
- 10.66 The policies of this section, along with the strategy of the Deposit LDP, aim to deliver this. Car parking control policy should help make sure that the number of parking spaces does not detract from attempts to make people use other modes of travel. This should also ensure that development in accessible locations, such as town centres have lower levels of parking to promote alternatives.
- 10.67 Using transport plans and transport statements can help make sure developers have shown how they intend their development to help in reducing car use. Additional information on what these statement should contain and how they will be used in making judgements on applications may help ensure these are effective and useful documents.
- 10.68 The spatial strategy for development is an essential part of reducing total travel demands, creating more self-contained towns or functional groups of towns. However, strategic matters should remain part of the strategy, with this section focusing on development control measures only.
- 10.69 Policy STR/5 lists specific projects that the LDP will help to implement by allocating land. Several of these are for improved public transport and cycling routes and their inclusion should help deliver these schemes, essential as part of the overall objective of reducing car use. New road proposals are less positive from a sustainability point of view, as they can lead to increased car use and have negative social and environmental impacts. The development of Llanwrst bypass is a decision that will be made at national level. However, the Council will need to make sure it is satisfied that the programme of road building and any detailed site proposals undergo appropriate environmental impact assessments.

Minerals and waste

- 10.70 The minerals policies of this section relate to protecting the existing resources by preventing sterilisation through inappropriately located development.
- 10.71 Policies also specifically state there will be no new hard rock quarries. The SA is supportive of the policy to prevent new hard rock quarries in Conwy, as this should help protect this resource for now and protect Conwy residents from further harmful impacts of quarrying. However, the SA notes that if demand for this mineral does not reduce in the UK it may require shipping stone in from elsewhere, therefore the impacts could potentially be shifted to another country rather than removed altogether.
- 10.72 The waste policies show an objective to move towards more sustainable management of waste, reducing the quantity that is disposed of in landfill. The LDP contains some sites where new facilities could be located, but does not allocate specific uses to specific sites. The SA of the policy notes that it may be preferable to allocate sites through the LDP to help delivery, and therefore more

sustainable waste management, in the shorter-term. Including the waste sites in the LDP would mean that they would form part of an overall strategy for waste management in Conwy. Not allocating sites means that decisions will have to be made through development control process, which may adversely impact on delivery.

11 Mitigation

- 11.1 The SEA Directive requires that consideration be given to how many significant impacts identified during the SA process could be mitigated.
- 11.2 Mitigation of the potential adverse impacts of the strategy could be achieved in a number of ways as set out in the following paragraphs.
- 11.3 **Adjusting policy wording** to fine tune policy can help to implement successfully more sustainable development. This could include, clarifying wording on some policies to help deliver the desired policy output. It could also include setting requirements development should meet in order to get permission.
- 11.4 **Re-organisation of policies** the SA notes that the clarity of the LDP may be improved by reducing the amount of repetition. This could include deleting policies that do not contain any specific development control criteria, combining some policies, and removing those that provide an overview of others.
- 11.5 Setting **requirements for developers** to show how they have addressed environmental and sustainability concerns through their development. This could include the need to prepare Travel Plans, ecological assessments, flood risk assessments, appropriate assessment under the Habitats Regulations, and Code for Sustainable Homes.
- 11.6 Preparing **up-to-date design briefs, or masterplans**, this could be for larger allocated sites and mixed use areas. These documents could be adopted as Supplementary Planning Guidance to the LDP and could include:
- the mix of development that would be expected on site, including affordable housing provision, or 'community hubs'
 - biodiversity protection or enhancement measures
 - the sustainable construction standards that should be met
 - the proportion of energy used on site that should be generated by on or near site renewables or low carbon sources
 - public transport, walking or cycling links.
- 11.7 Details on how developer **contributions or obligations** can be used to deliver sustainability benefits associated with new development. Specific contributions could be towards public transport improvements, improvements to the public realm, and affordable housing.
- 11.8 One of the principle ways to deliver development, and possibly mitigate against impacts, is to deliver the LDP in conjunction with **other strategies and plans** in the plan area. This includes delivering high quality public transport to improve access through the local transport plan and other programmes, delivery of community and regeneration strategies to help deliver development of town centre, green infrastructure and other plans and strategies on protecting and enhancing the natural and built environment.

12 Monitoring the sustainability appraisal

- 12.1 There is a requirement for monitoring of the sustainability appraisal. This provides a check of LDP implementation on sustainability development. This will need to consider positive and negative impacts, triggering a review if necessary.
- 12.2 The specific requirements of the SEA Regulations on monitoring are to:
- 12.3 “Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage” (Regulation 17(1))
- 12.4 The sustainability framework is a good starting point for developing targets and indicators for monitoring. However, monitoring for the SA can be part of the wider monitoring process for the LDP, using a subset of the overall monitoring objectives. The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore it may be possible to combine with the annual monitoring proposals for the LDP.
- 12.5 Monitoring need only begin once the LDP has been adopted and implementation begun. Therefore, a monitoring framework for the SA need not be agreed until the monitoring framework for the LDP is in place.
- 12.6 Many of the proposed indicators for the LDP set out in the proposed publication version of the DPD could be used to monitor sustainability issues. Appendix 4 shows the relationship of LDP monitoring indicators as they appear in section 5 of the LDP and sustainability objectives. This is intended as indication of how the monitoring and SA process are interlinked.
- 12.7 For a successful LDP monitoring framework the Council must ensure that the indicators they choose for monitoring are a manageable, really measure the effects of LDP implementation, and are matters over which the LDP have a direct influence. The indicators should also only address matters that are required through policy and not set indicators that exceed policy expectations.
- 12.8 In setting a monitoring framework for the LDP the chosen indicators and targets need to be:
- **specific** – in that it relates to policy objectives, indicators used for the LDP reflect what is set out in policy and strategy, and do not appear to be defining requirements that go beyond, or differ from, policy
 - **attributable** – monitoring the indicator must give results that can be directly related to the LDP policies, and should not be issues that are influenced are more likely to be influenced by matters outside the control of the LDP
 - **measurable** – it must be the case that data or information can realistically be gathered on the indicators, including whether this is possible given time and resources. Indicators could be linked to data already been gathered by other bodies, besides the planning authority

- **timescale** – the indicator must be capable of being monitored on a regular basis, usually annually, to be an effective part of a monitoring programme.

13 Conclusions and recommendations

13.1 The sustainability appraisal, of the Deposit version of the Conwy Local Development Plan (LDP) shows that there are many aspects of the strategy and policies that are likely to contribute to sustainable development. There is also a clear intention of the LDP to deliver sustainable development, demonstrated in the LDP vision and strategic objectives.

A sustainable spatial strategy

13.2 Creating a sustainable strategy is an essential part of creating a sustainable LDP. 'Frontloading' of the plan to have a sustainable spatial strategy should mean that the rest of the plan could simply follow this to deliver sustainability development in the plan area. Then using development control policies to fine-tune the strategy and get the most out of development, avoiding adverse sustainability impacts and securing benefits.

13.3 One of the principle roles of a spatial strategy is to deliver more sustainable development by reducing reliance on car travel. This can be done through supporting public transport improvements, walking, and cycling routes. However, more important than this a spatial strategy that sets a pattern of development that reduces the need and distance to travel in the first place.

13.4 The spatial strategy has an essential role in distributing development and therefore shaping the future shape of the towns and villages. It needs to look for ways to provide a mix of different land uses, such as homes, jobs and services, which people can access without getting in their car. The strategy needs to link where people live to where they work. Everyday commuting creates a large number of unsustainable car trips and often puts those who cannot travel by car at a disadvantage.

13.5 Reducing travel can have some major sustainability benefits. These include:

- reducing emission to air, with benefits for local air quality and helping mitigate against climate change
- lowering Conwy's contribution to climate change
- reducing congestion can be beneficial for the economy
- bringing health benefits from reduced air pollution and reducing adverse impacts on wellbeing of congested roads
- social benefits as more people have equitable access to jobs and services where the priority is not on people who can or choose to travel by car.

13.6 In principle, the strategy is compatible with this approach to creating a sustainable spatial strategy. It focuses the majority of development in the Urban Development Strategy Area and should help promote more sustainable patterns of development that reduce the need to travel.

- 13.7 In addition, permitting a proportion of development in the rural area can help support vibrant and viable rural communities, through the provision of new affordable homes for local people and new rural enterprise. It may be that additional information on the existing and potential roles of rural villages may have identified some that have the capacity to accommodate a higher level of growth. This could help support a strong local economy and provide a focus for a rural hinterland.
- 13.8 The spatial distribution of development is supported by a policy that requires all sites deliver a high proportion affordable house for local needs. This could have benefits in helping reverse the decline of rural communities and making sure young people can afford to remain in Conwy. However, the SA does note the need to make sure housing is coming forward for development to meet identified affordable housing requirements. With only 6,350 new homes to be built the target of 30% affordable homes for all new development needs to be rigorously applied to achieve this.
- 13.9 The SA also queries the basis on which housing and employment has been distributed within the Urban Development Strategy Area. The LDP provides little certainty that this is based on meeting the specific needs in each area. For instance, if it will help create greater self-containment in these towns or functional groups of towns, which is necessary for delivering real sustainable patterns of development, reducing travel and providing equitable access.
- 13.10 The SA also notes that there is not a great deal of difference between the amount of housing is anticipated to be delivered on windfall sites as on allocated housing sites. The SA suggests that, to make sure that these sites come forward in line with the spatial strategy, strategic policies need to be carefully worded to show where development will and will not be permitted, and the scale of development suitable in different towns and villages.

A useable plan

- 13.11 Part of securing sustainable delivery of development, as set out in the strategy and policies, will be making sure the LDP can be easily understood and implemented. For this reason, the SA makes some general suggestions on changes to the LDP to benefit the clarity and usability of the document.
- 13.12 The LDP is currently quite long and could be shortened to improve its accessibility. This could include:
- removing some of the repetition in the introduction, strategy and 'reasoned justification' of strategic policies
 - limiting policies to those that directly set development control criteria, in line with current WAG advice.
- 13.13 A separation of the 'spatial strategy' text and policies from the development control policies could also help improve the legibility of the LDP. The spatial strategy would set the framework against which all development proposals are tested, with development control policies used to make sure the sustainability benefits of all new development are maximised and adverse impacts avoided.

Policy coverage

- 13.14 The SA assessed the content of the policies of the LDP. This considered how these policies are likely to contribute to sustainable development as well as recommendations on how they could be improved.
- 13.15 **Principles determining the location of development:** These policies include the main strategy for development, the sustainability of which is part of the spatial strategy SA. Other policies are positive for delivering more sustainable development, and include the principles of good design and sustainable development. The SA recommends some changes to policy and text of avoid duplicating other sections of the LDP.
- 13.16 **Housing strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. There is much in this section that should help deliver more sustainable development, for instance the affordable housing policy could help to support sustainable rural communities.
- 13.17 The SA also makes some recommendations on possible changes to help deliver more sustainable development, including:
- housing densities should be maximised to make best use of accessible locations and land
 - some clarification may be needed in the policy on Gypsy, Traveller and Travelling Showpeople sites to make sure these are allocated and determined based on the diverse needs of each community.
- 13.18 The SA also reviewed the housing allocations made in the LDP, using the Council's appraisal of sites as a basis. The Council's appraisal is useful in identifying potential constraints to development on the allocations. These should be followed up in the LDP by including a housing implementation that lists for each site the constraints and sensitivities and how developers will be expected to take these into account in the development proposals.
- 13.19 The SA also queried how decisions were made on the allocated sites being the most suitable. It is essential that the Council can justify that the choice of allocations are compatible with sustainable development objectives. This includes being able to demonstrate that development of these allocations would not result in harm to the natural and built environment, where comparable alternative sites are available. This information is particularly important given the substantial revision of sites allocated for development between the 2009, 2010 and 2011 Deposit version of the LDP.
- 13.20 **Mixed use development:** Other information that may help the reader get an understanding of the role of the LDP and the future of the County Borough is more site specific information about allocations. Several of the sites allocated for development are to be for a mix of uses.
- 13.21 To secure development that is sustainable as possible in these locations Development Briefs and / or specific policies could be included in the LDP. These would address the overall aim for the development or redevelopment of a site,

including mix of uses, design guides, low carbon energy goals and access improvements.

- 13.22 **Contingency sites for housing:** The SA welcomes the inclusion of monitoring to release contingency sites. Greater certainty has been provided in background paper 41 (August 2012) of what the trigger points are for allowing these sites to be bought forward, although these should be outlined within the LDP itself. It is suggested that for sustainable development that these are only released in conjunction with meeting economic growth targets.
- 13.23 **The economic strategy:** Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The strategy includes permitting around 15% of new employment development in the rural area, the SA notes that this type of development should only be given permission where it is of a scale suitable to this location, to avoid creating unsustainable travel patterns. However, there may be benefits for rural communities of supporting rural enterprise.
- 13.24 The SA suggests to improve the clarity of the plan the split of the employment land requirements into 'predicted population change' and 'to reduce out-commuting' is removed. LDP policy, allocations and text do not appear to differentiate between what type or location of development these categories represent.
- 13.25 **Contingency sites for employment:** Managing the release of the additional 3.5 ha of employment land may be undermined by the policy that allows non-allocated sites on the urban periphery to be developed. If additional sites are allowed to come forward preventing the contingency sites may not be possible, with may undermine the chosen strategy.
- 13.26 **Tourism** is an essential part of the Conwy economy, the SA suggests some changes to tourism policies to help make sure they help deliver high quality new development of this type and supporting existing tourism schemes.
- 13.27 **Community facilities and services:** The policies of this section should help support the delivery and protection of accessible facilities and services, essential for viable communities. Policies include supporting retailing and protecting shops from inappropriate change of use, protecting and allocating allotment sites, and delivering new open space in development.
- 13.28 However, the SA makes some recommendations where improvements could be made to policies to help sustainability performance:
- Retail policy could include a strategic sequential approach to delivering this type of development, favouring town centres, to help reduce car travel and out-of-town retailing that can adversely impact on viability of town and village shops.
 - Policies allowing some change of use in shopping centres may help ensure vacant units do not harm the character of these areas. However, it may be suitable to state which types of uses will and will not be permitted to help make sure these areas remain primarily for shopping.

- 13.29 **The natural environment:** Protecting, and improving where possible, the natural environment is essential in securing the sustainable delivery of development. However, the SA makes some recommendations where improvements could be made to policy:
- Referring to nationally and internationally protected sites may be suitable in policy. This should not repeat national policies but could reflect on the implications of these designations on the local area, e.g. views to and from Snowdonia national park, and reference to the internationally designated nature conservation sites in Conwy, particularly as allocated development is in close proximity to some of these sites
 - in securing renewable energy as part of development, it may be suitable for the LDP set requirements for larger sites to consider viability of combined heat and power.
 - a flood risk policy could be included in the LDP to help avoid vulnerable development being put in areas of unsuitable flood risk.
- 13.30 **Cultural heritage:** Conwy contains areas characterised by high quality built historic and cultural heritage. The policies in this section should help in the protection of this, although some changes could be made to improve their clarity.
- 13.31 **Sustainable transport strategy:** The LDP includes policies to help deliver an improved transport network in Conwy. This includes protecting land for public transport, walking and cycling routes, these are essential to help secure a modal shift away from car use, and therefore reduce environmental and health impacts and support equitable access. Policies also include protecting land for new road proposals, these are likely to have negative sustainability impacts in the medium to long term, even where there are initial economic benefits from reduced congestion.
- 13.32 **Minerals and waste:** The minerals policies clearly set out that no new hard rock quarries will be permitted in Conwy, although the operation of existing quarries should be protected. This will help reduce the potential impacts of quarrying on people and the environment in the plan area. However, the SA notes that if demand in the long-term does not reduce the adverse sustainability impacts could be transferred to a quarry elsewhere (including outside the UK), this could include increased impacts from travel demand. Policies on safeguarding sand and gravel sites should help reserve this mineral resource for future use.
- 13.33 The LDP lists the type of waste facility that could be developed in the plan area and possible locations. However, to aid delivery of these sites in the short-term, and help deliver more sustainable waste management, it would be better to allocate specific sites and uses through the LDP. Relying on a planning application process to determine sites is likely to be a slower process, particularly if the waste management type is perceived as a risk to health, such as windrow composting or energy recovery.

Appendix 1

Sustainability appraisal matrices of the LDP policies

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1 Introduction

This appendix contains the sustainability appraisal matrices for the policies of the Conwy Local Development Plan Deposit Plan (February 2011). The appraisal includes all the policies of this, most recent, version of the Local Development Plan (LDP).

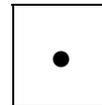
Policies that remain the same, or have minor changes, from the 2009 Deposit LDP have not been changed. Where a policy is new or updated a section at the end of each matrix notes the impacts to sustainable development of the change.

The matrices include:

- a comment interpreting the purpose of the policy for the appraisal
- a simple symbol summary of each policy's performance against the sustainability objectives
- a comment on how effective the policy will be in achieving more sustainable development
- recommendations on how the policy could be improved to deliver sustainable development and avoid adverse impacts.

Key to appraisal symbols

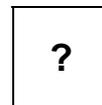
Likely to contribute to the achievement of greater sustainability according to the identified objective



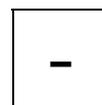
Likely to hinder the achievement of greater sustainability according to the identified objective



Likely effect but too unpredictable to specify, or multiple impacts which are potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



2 Sustainability framework

Headline	Ref	Objective
Social progress which recognises the needs of everyone		
Access to services	SP1	<ul style="list-style-type: none"> • Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation
Community and culture	SP2	<ul style="list-style-type: none"> • Maintain and enhance community cohesion and identity
Health and well-being	SP3	<ul style="list-style-type: none"> • Provide a clean, healthy and safe environment for all
Housing	SP4	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs
Effective Protection of the Environment		
Biodiversity	EP1	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area
Landscape character	EP2	<ul style="list-style-type: none"> • Ensure special and distinctive, natural and historic landscapes and their specific features are conserved and enhanced
Built environment	EP3	<ul style="list-style-type: none"> • Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards
Cultural heritage	EP4	<ul style="list-style-type: none"> • Conserve and enhance the built and archaeological cultural heritage features of the area
Prudent use of natural resources		
Energy	NR1	<ul style="list-style-type: none"> • Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources
Land	NR2	<ul style="list-style-type: none"> • Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant
Water	NR3	<ul style="list-style-type: none"> • Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding
Air and Atmosphere	NR4	<ul style="list-style-type: none"> • Reduce all forms of air pollution locally and globally to reduce air pollution and improve the atmosphere
Minerals and primary resources	NR5	<ul style="list-style-type: none"> • Safeguard non-renewable resources and promote reuse of primary resources
Maintenance of high and stable levels of economic growth and employment		
Economic diversification	EG1	<ul style="list-style-type: none"> • Encourage diversification of the economic base in rural and urban areas
Employment access	EG2	<ul style="list-style-type: none"> • Ensure that there is good access for all to employment
Encouraging investment	EG3	<ul style="list-style-type: none"> • Emphasise and increase factors conducive to wealth creation and attractiveness to investors

3 Principles determining the location of development

Policy DP/1															
Sustainable Development Principles															
This policy covers the sustainable development criteria that development proposals in the County will have to meet in order to demonstrate a development contributes to achieving environmental, economic and social gains. The policy introduces various other individual policies that are in the LDP which contribute towards sustainable development. In each criteria it references and repeats wording from these other policies.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	-	?	-	?	?	?	?	?	?	?	?	-	?	?	-
Sustainability commentary and significant impacts															
The criteria of the policy are positive in terms of aiming to deliver more sustainable development, and should help make sure that all new developments are taking into account the principles of sustainability. For major applications a Sustainability Appraisal (or Statement?) is required, and guidance on the preparation of the Appraisal/Statement will be provided in forthcoming SPG.															
There may be the potential to help avoid duplication of criteria through the LDP by making sure that either this section or later policies of the plan do not repeat these. At the moment the wording of this policy could be seen as an introductory list to the policies which follow in this section of the LDP. Each bullet point refers to individual policies and the text repeats elements these. For a clear and succinct plan it may be suitable avoid this repetition to avoid from detracting from the positive approach the Council seek to take on providing sustainable development.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Criteria in this policy repeats criteria that is repeating in a number of policies within the Deposit LDP. It is unnecessary to repeat policy criteria twice, therefore maybe it would be better to delete this policy and provide supporting text/introductory section outlining that all development should seek to deliver sustainable development and therefore all policies in the LDP should be read as a set. An introductory section could provide just the key objectives/aims of the Council relating to providing sustainable development. 															

Policy DP/2															
Overarching strategic approach															
This policy sets the overall spatial strategy for Conwy, focusing on what type of development will be permitted in and around the town and villages (sorted into a hierarchy). The policy contains no development quantities, although it does show proportions.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	?	•	?	?	?	?	-	•	-	?	-	-	?	?
Sustainability commentary and significant impacts															
This is the main strategic policy that sets out how growth will be distributed around Conwy. This clearly indicates that the focus will be in, and on the periphery of, the main urban areas.															
This overall approach is broadly compatible with sustainable development, as it is these town locations that are likely to be the most sustainable in terms of access to jobs, services and essential day-to-day needs. The principle way this will help in delivering sustainable development is to help control, and ideally reduce, the need to travel by car now and setting patterns of development for the future. There is also the opportunity for new development associated with existing urban areas to contribute to the regeneration of these towns.															

The main split of development between larger and smaller settlements (85:15 for housing and employment land) is compatible with helping focus development in urban locations, supporting accessibility of services and jobs and also protect the countryside from development.

The policy does break down the development between the 'main towns', instead treating these as a whole. Other policies of the plan do increase the detailed breakdown of development types in each location. However, it would be useful to see this as part of the strategy. The purpose of which is to show what the roles are of the individual settlements, revealing the location that has chosen to be focus of development in Conwy. This may be particularly significant when it comes the roles of the coastal locations, against rural towns, such as Llanwrst, where the issues faced and opportunities for development are very different. For example, the difficulties of securing employment growth in the rural towns, due to distance from the main road, may mean a different, or lower growth strategy is suitable for these areas. This is so as not to exacerbate any imbalance in where people live to where they work, or to encourage the continued movement of young people out of the area to find work.

It should also be clearly stated, that with the exception of Affordable Housing for Local Needs (AHLN) at Llanwrst, no development is permitted outside settlement boundaries. This is clearly implied by the policy it is never made explicit.

For the main villages policy wording again could be simplified to improve understanding, with the current policy mixing spatial objectives with policy requirements. Again the policy is stating that in all Tier 1 villages new development should be within the development boundaries, with the exception of AHLN. For Tier 2 villages development is all for AHLN and therefore development is also permitted outside the development boundaries – so long as it's of an appropriate scale to the village.

AHLN development will be permitted in minor villages.

Provision of AHLN should help to support local communities, helping young people remain in their local area and it is hoped maintaining these as viable villages. However, it should be ensured that this policy does not create pockets of deprivation in settlements that have few or no local services, and rely on car trips to meet all day-to-day needs. AHLN issues are returned to in policy HOU/2.

It may be possible to improve the policy, and therefore make it more readily apparent what the strategy for development is, by simple clarifying the wording and avoiding unnecessary sections. For instance stating that the settlement boundaries will re-drawn, as this is demonstrated already in proposals maps. Also, some of the policy criteria within DP/2, relating to affordable housing, repeats policy criteria within policy HOU/2.

It is also noted that there are caveats to this policy where development would be permitted in the countryside, although the strategy does not refer to these. Examples include new tourism related accommodation and attractions, conversions, and agricultural workers homes.

Recommendations including mitigation:

- Make the policy more concise and avoid duplicating other policies of the plan, e.g. on AHLN and housing spatial strategy
- Possibly combining this policy with HOU/1, HOU/2 and possible EMP/1.
- Include more specific detail of the roles of settlements, to then be able to define how the spatial strategy is helping to address these needs, e.g. more or less housing to balance employment provision
- Make the strategy clear on what types of development it covers

Policy DP/3**Promoting Design Quality and Reducing Crime**

This policy covers the development criteria that development proposals in the County will have to meet in order to demonstrate good quality design. The criteria include requirements for the historic environment, biodiversity, open space, designing out crime, SUDS and flooding. It also requires a Design and Access statement for each site and analysis of existing features and designations.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	•	•	•	-	•	-	•	-	-	-	-	-

Sustainability commentary and significant impacts

The policy will help to inform proposals how design considerations need to be taken into account and should bring improvements to the built and historic environment. It goes further than design, in that it provides criteria relating to open space, biodiversity, energy efficiency, SUDS and designing out crime. This is an important element of design and key to a design policy, in that these types of issues are integrated into the design of a development. Whilst it is important to integrate these issues, the policy cross references with Policy NTE/11, which does not appear in the document. The policy also seems to repeat criteria in Policy DP/4.

The policy is split between criteria which is 'required' and other criteria which the Council will seek 'where appropriate'. It is unclear why the criteria relating to good quality design is not all required as a starting point for development.

The policy has the potential to have many positive impacts on delivering sustainable development.

Recommendations including mitigation:

- The policy integrates with other policy areas but the criteria should not repeat other criteria in the document and not cross reference to other policies, although currently there is no Policy NTE11.
- It would make the policy stronger if all criteria was required from development, as many of these issues such as enhancing local character, integrating with existing routes and creating safe places are key important design considerations.
- Criteria in this policy repeats some of the criteria in DP/4 which is unnecessary and should only appear in one of these policies.

Policy DP/4 Development Criteria															
The policy sets out the approach for a wide spectrum of issues relating to development. It includes where affordable housing will be asked for; a list of design criteria which repeats much of what appears in DP/3; planning obligations relating to infrastructure, services and facilities; and other development criteria.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	•	?	?	-	-	-	•	•	•	-	-	-	-	-
Sustainability commentary and significant impacts															
Although the policy provides important criteria relating to development, it seems to repeat policy criteria which is (or could) be provided in already existing individual policies within this document. For example, there is already a policy on affordable housing for local need HOU/2, so there does not seem to be any need for criteria in this policy. Design criteria is within the first half of the policy and repeats much of the previous policy DP/4. The remaining policy criteria relating to issues such as flood risk, biodiversity, landscape etc are covered by other policies in this LDP and it is unnecessary to repeat criteria in the same document.															
For some of the criteria it is slightly unclear what the likely unacceptable adverse impact would be for individual development criteria. It might be better suited to delete these in particular, and retain in the individual policies, where a comprehensive explanation and fully policy can be provided. This is particularly the case for where development could impact on the Welsh language or on essential community facilities.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It may be better to delete this policy and ensure that the important criteria it currently lists is incorporated into the fuller comprehensive policies, such as DP/4, HOU/2, DP/5 and other relevant policies. 															

Policy DP/5 Infrastructure and New Development															
This is a simple policy that makes clear to developers that financial contributions will be required from new development to deliver social, economic and environmental infrastructure. The policy signposts an SPD that will set out obligation expectations.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	?	?	?	?	-	?	?	-	?	?	?	-	-	-	?
Sustainability commentary and significant impacts															
The SA supports the flexible use of developer contributions in achieving environmental and social benefits for the Borough from new development. The policy allows for a flexible approach for securing contributions, although there will need to be move to a standardised fee set though the Community Infrastructure Levy. The requirement for CIL will come in during the lifetime of the LDP (2014)															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • Infrastructure studies will need to be completed to provide a robust basis for CIL. 															
Implications of policy revisions															
This policy was previously more detailed. However, this unnecessarily repeated the guidance of supplementary policies. Sustainability implications of the policy remain largely unchanged.															

Policy DP/6 National Planning Policy and Guidance															
The policy refers applicants to comply with national planning policy and guidance.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
The policy does not provide any development criteria that require proposals to meet. It is important to indicate to applicants that development should comply with national planning policy and guidance, but it is not necessary to be within a policy. Policy should only relate to the Council's expectation of new development.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • This policy should be deleted from the LDP as it is not development criteria, and would be better suited as an introductory section in the front of the plan. 															

Policy DP/7															
Local Planning Guidance															
The policy refers applicants to further guidance available at the Council, from Supplementary Planning Guidance, Master Plans and Development Briefs.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
The policy does not provide any development criteria that require proposals to meet. It is useful to indicate to applicants where further guidance can be located. Policy should only relate to the Council's expectation of new development.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> None 															
Implications of policy revisions															
Details of SPG have been removed from the policy and now appear in the supporting text. Sustainability implications of the policy remain unchanged.															

Policy DP/8															
Masterplans and community appraisals															
This policy sets out the criteria on which proposals resulting from masterplans etc will be assessed.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
The policy may help to make sure that masterplans fit with the objectives of the LDP, making clear that other planning considerations may come before the content of a masterplan or other appraisal. It is not clear on the exact purpose of the policy as clearly all development proposals will be subject to compliance with other planning policies that already cover these points.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> The need for the policy is queried, possibly adding an unnecessary layer of complexity to the delivery of development Criteria (d) should include 'appropriate assessment' as part of the Habitats Directive, this could be widened to include health impact assessment also. 															
Implications of policy revisions															
New policy.															

Policy DP/9															
Colwyn Bay Masterplan															
The policy clarifies which of the Colwyn Bay Masterplan objectives the Council 'supports'. These range from the design of new buildings to the type of development that should be delivered.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	?	•	-	-	•	?	-	-	-	•	-	•	•	•

Sustainability commentary and significant impacts

The Colwyn Bay regeneration and renewal can have substantial benefits for the sustainable future of the town. Encouraging inward investment and improvements to services and physical fabric of the area will benefit local people and the economy of the area. The policy itself could be revised to reinforce the importance of delivering the positive elements of the masterplan and therefore achieve the aims for an improved Colwyn Bay.

Recommendations including mitigation:

- The policy could be more proactively worded, for instance transposing the masterplan objectives into actual policy criteria for delivery of development in this location. This positive approach may have greater benefits for delivery than the currently worded 'supports' approach applied.

Implications of policy revisions

.New policy

4 The housing strategy

Policy HOU/1

Meeting housing needs

This policy sets out the principles for delivering housing development in the County Borough with the priority on coastal towns, the policy also sets out the approach to delivery of new affordable housing for local needs (AHLN) – including those settlements where all new housing should be of this type.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	?	•	?	?	?	?	-	?	-	?	-	-	?	?

Sustainability commentary and significant impacts

This policy addresses the strategy for the spatial distribution of housing in Conwy. It divides the County Borough into 'urban development strategy area' and 'rural development strategy area', based on their place in the settlement hierarchy. The policy also identifies all the primary new allocations for housing development in the two areas.

The Council will need to be confident that the identified housing requirement does meet the need of the County Borough. It is notable that in some areas the quantity of housing has changed significantly between plan making stages, such as Llanfairfechan where the allocation is down from 245 to 40 homes.

An approach to development that focuses the majority of new housing in the existing larger urban areas is compatible with sustainable development. This distribution is most likely to support a pattern of development that is more accessible and reduces reliance on car travel. For instance, new development will be in locations that are already relatively well served by existing community facilities, access to local employment and on good public transport access.

The policy also permits some development in the rural villages in order to fulfil local needs with the aim of retaining mixed communities in these areas to support local business and community facilities. In small settlements development will have to be 100% affordable housing this will help to meet local needs in these areas. This will have benefits of maintaining demographically village communities, which support working populations not only retirees and second homes. However, the policy only 'seeks' 100% affordable housing subject to viability. Although there may be circumstances in which policy can be negotiated with developers if viability is an issue, the policy wording relating to affordable housing should be requirements.

A sustainable spatial strategy includes details of why the pattern of development has been chosen. This includes identifying a clear spatial strategy at the outset, based on the needs and opportunities in individual towns and villages, such as redressing employment or housing imbalance, regeneration or improving access, and then allocating sites to address these. The LDP is not entirely clear on the reasoning behind the strategy. For instance, do the allocations simply relate to available land, rather than follow a more strategic 'roles and function' approach. Such an approach may have been particularly beneficial in the inland rural areas, where some villages could have been the focus for larger amounts of growth to support thriving local economies.

It is clear one of the difficulties of the delivering a spatial strategy for Conwy is only around one third of the housing is available for allocations through the LDP (based on LDP figures). This limits the spatial strategy, as unless in some settlements new housing is restricted to commitments and windfall, there is little that can be done to change the pattern of development in Conwy. However, limiting growth in some areas may be suitable to help avoid increasing the number of homes in areas of low employment availability and put more homes in areas of good access to jobs, services and community facilities.

The list of allocated sites demonstrates the level of development that will go to each settlement, or settlement group in line with the spatial strategy. The table shows that the focus of development will be in the Abergele area, with over 40% of the new homes in the urban development strategy area in this location.

The policy also aims to address many issues in one, and this has resulted with some substantial overlaps and repetition of other policies. Cross-referencing other policies within HOU/1 will have no benefits in delivering sustainable development, each relevant plan policy will have to be applied in any case.

The policy does not contain any details on the contingency land allowance that is a feature of the plan, and includes land allocation. This additional information would add clarity to the strategy enabling those commenting on the plan to get a better overall picture of the sustainable spatial strategy.

Recommendations including mitigation:

- Make the policy more concise to avoid duplicating other policies of the plan, e.g. on AHLN and strategy
- Include more specific detail in the LDP of the roles of settlements, to then be able to define how the spatial strategy is helping to address these needs, particularly in the rural area, e.g. more or less housing to balance employment provision
- Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of housing development, including protection of the natural and built environment, good quality built design and sustainable construction
- The policy should focus on issues of policy making only and does not need to describe other matters, such as how settlement boundaries are defined or the green wedges.

Implications of policy revisions

This policy has been revised from the last Deposit to increase the number of new homes the LDP will deliver. The policy lists the housing allocations, giving an indication of the distribution of development. Listing these as policy is a useful addition to the LDP, adding an extra level of certainty to the delivery of housing and the spatial strategy.

The repeated revision of housing allocations should help make sure those that are allocated are actually deliverable. However, the Council will need to be confident they have the information to back-up the allocation of all these sites and yields identified are reasonable. This should include the sustainability assessment of all sites and their alternatives to demonstrate these sites will help deliver sustainable development.

Policy HOU/2															
Affordable housing for local need															
This policy sets the affordable housing targets for development in Conwy. This includes the variable targets for different types of site.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	?	•	?	?	?	?	-	?	-	?	-	-	?	?
Sustainability commentary and significant impacts															
<p>The delivery of Affordable Housing from Local Needs (AHLN) has the potential to have sustainability benefits for Conwy. This will be providing homes that support local people and communities, thereby lowering the proportion of new homes that bought as second homes or people retiring to the area. This can help support the culture and character of rural villages and support businesses in the area by providing a demographically and socially mixed workforce.</p> <p>Evidence on viability is essential to progress the policy through LDP preparation and secure delivery, and this is covered in an LDP Background Paper.</p> <p>The 30% target is likely to be realistic based on financial viability. However, the policy must be rigorously applied to ensure opportunities for delivering AHLN are not lost. It may be possible to implement variable targets in different areas, for instance locations where the market is strong and returns are higher achieving greater than 30% may be possible. The exception clause, which currently appears in the policy weakens it and would be better suited within supporting text. Financial viability issues will always be a consideration of delivery of AHLN and this need not be set out in policy. The aim should always to be enter negotiation with developers to achieve the target the Council has set, even if this has to be reduced following discussion to achieve delivery.</p> <p>As with other policies there is some repetition of the detail of this policy with DP2 and HOU/1, and as previously mentioned the sustainability appraisal suggests making policies more clear by restructuring them. Policies should also avoid unnecessary detail that would only duplicate the provisions of other national or local policy. For example, point 'v' on development in the open countryside.</p> <p>It is notable that existing permissions are contributing very little to delivering affordable housing, as they are based on old policy. Therefore, it is essential for development management staff to have the right training and tools to successfully negotiate the high levels of affordable housing need on new permissions.</p>															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • The policy needs to clear and positively worded so as to maximise the number of affordable housing coming forward during the Plan period, in all locations. • AHLN Supplementary Planning Guidance should be prepared, giving details on how these sites will be delivered, including: <ul style="list-style-type: none"> ○ securing use in the long-term ○ mix of social rented to intermediate housing ○ how affordable homes will be integrated into market housing ○ managing developer contributions on small sites for delivery of affordable housing by the Council. • A SPG on developer obligations will help make clear to developers what financial contributions they will be expected to make, including AHLN. This could help clarify how negotiations on contributions would take place, and how decisions on priorities will be made if based on financial viability • Higher targets could be sought in locations with a stronger market, or targets could be 															

raised later in the plan period when the economic situation has improved and the housing market is more buoyant

- Some elements of the policy are more suited to the main strategic housing policy, such as the size of windfall sites.
- Some elements of the policy are more suited to the supporting text, such as any reference to where market dwellings may be permitted in exceptional circumstances, if 100% affordable housing is not viable. This will strengthen the policy, but at the same time still provide explanation to when the policy can be negotiated with a developer.
- The need for the proportion of AHLN on each site to be based on a strong evidence base in order to be able to successfully negotiate delivery and support the policy in Public Examination
- Training for development control staff may be needed to ensure that they can successfully negotiation with developers for the high level of affordable housing provision needed under this policy, which is a significant step-change from UDP policy
- Policy wording could be changed to indicate that 100% AHLN may be possible 'directly adjoining' Llanwrst and Main Villages (as is the case for Minor Villages), rather than 'outside' these villages.

Implications of policy revisions

The targets for AHLN have been reduced from 50% in a previous deposit to 30%, and requirements for small sites have been relaxed. Previously the SA did support a high AHLN provision but did raise concerns over viability of 50% in the current market, and if policy might slow the delivery of all types of homes. In particular, those settlements where the reasoned justification stated that housing provision has been slow in the recent years, for example in Llanfairfechan and Penmaenmawr. Setting high affordable housing targets also could adversely impact on delivering other sustainability benefits through developer contributions.

The SA would suggest a higher target in strong market areas or under future review of the LDP if the economic situation has improved.

The revised Further Changes policy includes more caveats on delivery of affordable housing that may undermine some delivery of this type of housing to meet identified needs.

Policy HOU/3

Phasing Housing Development

The policy simply refers to the release of sites in line with the phasing plan in section 5.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	?	•	-	-	-	-	-	?	•	-	-	?	?	?

Sustainability commentary and significant impacts

The phasing referred to here primarily relates to the ensuring that sites have the correct infrastructure in place prior to their development. Each housing allocation is phased within three LDP time periods.

To deliver housing and employment sites in a sustainable way it is necessary that their development does not place undue pressure on existing infrastructure. Pressure beyond the capacity to accommodate growth can result in adverse impacts. Impact can relate to harm to the natural environment, such as through exceeding capacity in waste water treatment, or create a poor quality or unsafe place to live, such as from flood or road safety risk.

The plan contains little detail of how the contingency sites will be bought forward if it is shown there is requirement for their development to match other growth. A clear implementation plan will be necessary to priorities and control the release of these sites. For instance, the criteria that will

need to be met to show additional homes are required (affordability, threshold level of new jobs created). Also, how will contingency sites be prioritised, for instance based purely on location or also on sustainable development principles. Control of the release of this land will be essential to its successful implementation and help provide the means by which these sites can be controlled and not disrupt delivery of the preferred strategy.

Recommendations including mitigation:

- The phasing plan could have referred to additional information on the issues that need to be resolved on sites prior to their development. Examples could include biodiversity protection, community services and open space, contaminated land remediation.
- Additional information on the control on contingency sites, including specific thresholds for triggering release and how the sites would be prioritised.

Implications of policy revisions

New policy.

Policy HOU/4

Housing Density

The policy provides for housing densities on allocated sites and large windfall of 30dph and higher densities of up to 50dph in some locations.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	?	-	?	?	-	?/x	-	-	-	-	-	-	-

Sustainability commentary and significant impacts

It is important to increase densities in more sustainable locations that have good access to a range of services, facilities and employment opportunities. Higher densities also concentrate more people in an area this can support. Setting minimum densities should help make good use of land. Lower densities require a greater land-take and more spread out development that can lead to negative sustainability impacts in terms of impact on the natural environment and reduced accessibility.

The policy also provides a maximum density of 50dph. Providing maximum densities is not appropriate as it does not allow the good use of land in very accessible locations, such as next to train stations and in town centres.

Higher density development should be permitted and should have no adverse impacts on the built environment if other policies on control of design and mix of housing types are followed. Lower densities will not always mean better quality design. Flats built at low densities can lead to poor quality use of space and unattractive empty areas between blocks.

These low densities mean that the number of homes built in the area would be less than if the densities were increased. Thereby requiring more land, or if this is not supplied, a lower delivery of affordable homes.

Recommendations including mitigation:

- Sites in sustainable locations should not be restricted to a maximum of 50 dph. In fact, it would be more appropriate and flexible not to provide for any maximum density. The density for sites should be dealt with on a case by case basis, and maximised as much as possible. Therefore, for sustainable locations the Council could set a minimum density of 50dph and allow other policies to restrict the density, such as landscape and historic environment policies to ensure the development is in keeping with the surrounding area.

Implications of policy revisions

There has been some change of wording to the policy to require higher densities not to have a negative impact on the surrounding area. The provision related to not harming delivery of affordable housing has been added. It is likely that these additional criteria will not improve the sustainability performance of the policy, as design is covered elsewhere.

Policy HOU/5																
Housing Mix																
The policy sets out the general requirements for the housing mix in the County Borough.																
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3	
-	?	-	•	-	-	-	-	-	•	-	-	-	-	-	-	
<p>Sustainability commentary and significant impacts</p> <p>Providing for a mix of market and AHLN housing, that reflect the local needs outlined by local evidence, is key to providing a sustainable mixed community. This will allow for different types and tenure of houses to be located in specific places depending on the local need in an area.</p> <p>The policy is promoting more smaller homes of 3 or fewer bedrooms. Larger homes should only be provided if there is evidence of local need. If these requirements are based on good evidence then this will help provide homes to meet needs. However, provision of family homes in some areas, particularly affordable homes, may be essential in some locations to support a demographically mixed communities.</p>																
<p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> The supporting text should be relevant to the policy. 																
<p>Implications of policy revisions</p> <p>The revised policy is much less specific than the previous version on the proportion of different housing sizes the plan should provide. A change away from overly prescriptive policy was recommended by the sustainability appraisal. The policy outlines the percentage split of housing size for developments over 5+ dwellings. This is slightly restrictive, in that it may not be possible or suitable for all sites and locations to provide this actual breakdown. It might be better suited to provide this range of house sizes over a number of sites which is monitored by the Council.</p>																
Policy HOU/6																
Rural Exception Sites for Affordable Housing for Local Need																
The policy allows for 100% affordable housing for local need on rural exception sites, in line with National policy. It outlines that affordable housing will remain in perpetuity and that the type, size and tenure of dwellings should meet a justified local need. It also lists a couple of design standards guides which the policy requires development to meet, as well as the Council's Affordable Housing Discount for Sale Criteria.																
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3	
?	•	-	•	-	?	-	-	-	x	-	-	-	-	-	-	
<p>Sustainability commentary and significant impacts</p> <p>This is a positive policy which provides affordable housing for local need, where market housing would not normally be permitted, seeking to keep in perpetuity and locate the right number, size, type and tenure of dwellings in the right locations. It provides for meeting high quality built development in these rural locations, meeting Code for Sustainable Homes and the Assembly Government's Development Quality Requirements – Design Standards.</p> <p>Criteria (f) requires policies to meet the Council's Affordable Housing Discount for Sale Criteria, but it is unclear, from the policy or the supporting text, what this actually is.</p>																
<p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> Ensuring rural exception sites for affordable housing is kept in perpetuity and that the number, size, type and tenure should meet a justified local need is key criteria within this policy, and important to remain within the policy. 																

- Although it is important that rural exception sites are of a high quality build, criteria (e) may be unnecessary as all new development will need to comply with other local and national policy.
- A further paragraph, within the supporting text, would be useful to applicants to explain briefly what is expected from the Council's Affordable Housing Discount for Sale Criteria.

Implications of policy revisions

Some additional criteria have been added to the policy and clarification of wording. The revised policy is likely perform better in securing rural exception sites that do not harm the natural environment than the previous version.

Policy HOU/7**Council and Government Owned Sites in the Plan area**

This policy sets out a requirement for a greater proportion of AHLN on Council owned sites.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	-	•	-	-	-	-	-	-	-	-	-	-	-	-

Sustainability commentary and significant impacts

This is a positive policy and should help ensure that the development of publically owned sites are developed to meet the needs of local people.

Recommendations including mitigation:

- None

Implications of policy revisions

New policy

Policy HOU/8**Register of Land Holdings**

The policy outlines the intentions of the Planning Policy Service at the Council, in that it will work in partnership with other organisations, to establish a County Borough-Wide register of land holdings in public ownership for AHLN.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Sustainability commentary and significant impacts

Setting up a register of land holdings in public ownership may be a useful tool to the planning department, but this is not planning policy criteria to permit, or not permit, a development. This is more a process in which the Council can implement other planning policies in the LDP.

Recommendations including mitigation:

- This policy is a process in which the Council will implement LDP policies and therefore should be deleted from the LDP. It could be included within the supporting text of HOU/6. to explain how the Council will implement the policy, although it could also explain what will happen once the register has been compiled.

Policy HOU/9															
Meeting the site need for Gypsies and Travellers															
The policy sets criteria for delivery of new pitch sites for Gypsy and Travellers in the County Borough.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	-	?	-	?	-	-	-	-	-	-	-	-	-	?
Sustainability commentary and significant impacts															
There is a requirement for Council's to provide sites to meet the needs of Gypsies and Traveller communities in the area. Providing permanent sites as well as temporary or transit sites is essential to support these communities. Legal sites are essential to provide security to these communities and access to essential local education and health services.															
The best way to deliver sustainable and secure sites is through allocation in the LDP. Finding sites through a rigorous appraisal of all options can help identify those that limit adverse impacts to the natural environment, as well as providing the greatest benefits to future residents.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • Following completion of the local needs assessment it may be suitable to review the policy and allocate sites. This will need to take into account the differing needs of individual Gypsy and Traveller communities and the type and scale of site that may be needed. • Criteria (h) needs to be carefully applied so as to avoid unwarranted hostile objection to legitimate and suitable pitch sites. 															
Implications of policy revisions															
The previous version of the policy stated that a site would be allocated following Local Market Assessment. The SA identified that a single site may not be suitable given the differing cultural needs of Gypsy and Traveller communities, and more information will be needed on the source of need prior to any allocation.															

Policy HOU/10															
Houses in Multiple Occupation and Self Contained Flats															
The policy restricts the development of houses in multiple occupation and self contained flats within new developments. Policy criteria provide tests against which the sub-division of residential properties to self contained flats will be permitted.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Providing policies to resist and guide developments which cause a nuisance can play a positive role in aiding regeneration, where in the past this type of development has had an adverse impact on the existing community. It does however restrict the number of smaller more affordable properties for rent in locations where people can not afford to rent larger properties.															
Criteria (1) outlines that proposals to create Houses in Multiple Occupation will be 'resisted', which is not strong wording to the applicant.															
The criteria provided for the sub-division of residential properties to self contained flats provide a number of tests relating to Development Principles, the Council's Parking Standards, protecting residential amenity and privacy of neighbours. This type of criteria is important, but should apply to all development, not just development relating to the creation of self contained flats.															

Recommendations including mitigation:

- The wording in criteria (1) should be replaced from 'resisting' to 'will not be permitted', if the Council are seeking to control the development of houses in multiple occupation to aid regeneration.
- Tests relating to Development Principles, the Council's Parking Standards and protection of residential amenity should be within policies that relate to these subjects and applied to all development, not just applications that come in for houses in multiple occupation and self-contained flats.

Implications of policy revisions

The policy has had a minor revision to remove the reference to Houses in Multiple Occupation and Self-Contained Flats SPG.

Policy HOU/11**Residential care homes and extra care housing**

The policy sets criteria for the development of care homes and extra care housing. The focus of this type of development will be in larger settlements.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-

Sustainability commentary and significant impacts

There is an ever increasing demand for this type of development, especially in relation to an aging population.

The policy criteria appear straightforward and practical. Ensuring these developments have good access to town or village centres is essential for the wellbeing of residents, allowing some level of independence. The policy could require that this type of development is only permitted in towns and villages with a regular bus service, both for independence of more able residents and for employees.

Recommendations including mitigation:

- The policy could include a criteria ensuring that these developments only take place in settlements with a regular bus service.

Implications of policy revisions

This is a new policy and should help to ensure that this type of development is only permitted in the most suitable locations.

Policy HOU/12**Re-use and Adaptation of Redundant Rural Buildings for Residential Use**

The policy sets out the development control criteria for permitting the residential use of redundant buildings in rural areas.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
x	-	?	-	?	?	•	-	x	-	-	x	-	-	x	-

Sustainability commentary and significant impacts

The policy should help in the control of this type of development restricting it to business, tourism, sport and recreation before being permitted for housing. It also seeks to be provided for affordable housing, before market housing. The criteria of the policy should help to make sure that impacts on the countryside and landscape are controlled. Landscape character appraisal should also ensure that the visual impact of this type of proposal is mitigated, essential to preserve the character of the countryside.

Residential development in the countryside is recognised as unsustainable development, as it is not located close to local centres with key facilities. Therefore, where housing is proposed evidence provided with applications needs to be robust, to demonstrate that other uses are not in demand.

Recommendations including mitigation:

- A single policy on re-use and adaptation on redundant rural buildings could create a more succinct plan, covering all types of use including housing and employment.

5 The economic strategy

Policy EMP/1															
Meeting B1, B2 & B8 office and industrial employment needs															
This policy sets out the overall strategy for delivering employment development in Conwy, including the split between the urban and the rural areas.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	-	?	?	?	?	-	?	-	?	?	•	•	•
Sustainability commentary and significant impacts															
This policy sets out the employment land requirement across the borough (committed and new sites) and a contingency for the plan period.															
<p>The policy splits the housing land allocation into two parts – the anticipated employment land requirements from an increasing population, and the employment land requirements needed to reduce out-commuting for work. In terms of achieving more sustainable development reducing commuting is strongly supported. This can help reduce emissions from transport as well as helping people gain employment local to where they live, helping create more sustainable communities. However, this is dependent on matching the locations of new jobs to housing areas, as simply reducing out-commuting will not necessarily reduce the length of trips people make to work – for instance in Kimnel Bay.</p> <p>The LDP does not make clear what the distinction is between the two types of housing allocation, for instance no site allocation is identified as a ‘reduce commuting’ site or a ‘population change’ site. The type of employment and allocation of sites is likely to always provide jobs for part of each category. This means in practice for a clearer more legible employment strategy the two types should be combined. This will create an overall land allocation of 36ha of employment land (with a contingency of 3.5ha).</p> <p>This policy repeats some spatial elements of the DP/2 policy and other policies of this section, providing an introduction to the employment development in the area but not necessarily any additional policy requirements. However, the strategy of focused employment should be positive on creating more sustainable patterns of development.</p> <p>If employment is located on greenfield sites, it will have inevitable adverse impacts on protecting open land. There may also be adverse impacts on biodiversity and landscape and impacts will need to be managed to effectively reduce these as much as it possible. Other impacts may come from the loss of agricultural land and changes in water drainage patterns.</p>															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction • Employment development should be delivered at levels to match housing growth local to each area, in order to create sustainable travel patterns • Consideration could be given to deleting this policy and integrating elements in other policies of the strategy and employment chapter (much is already covered) • Understanding of the policy could be improved by combining the two types of employment allocation (out-commuting and population change) 															
Implications of policy revisions															
The greatest change to the policy is the way the employment requirement has been split. Contingency sites also have been included to be bought forward if necessary within the plan period. The reduction in the employment requirement is supported in helping create a more sustainable place. The former approach allocated so much land that it may have been difficult to															

control its delivery in way that is compatible with creating more self-contained places that make best use of previously developed land.

Policy EMP/2

Allocation of new B1, B2 and B8 office and industrial employment sites

This policy sets out the detail of site allocations in strategic locations, some of which are already committed through existing permission or long-standing allocations where infrastructure is already installed, in addition there are existing allocations and phasing of land.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	-	?	?	?	?	-	?	-	-	-	•	?	•

Sustainability commentary and significant impacts

This policy is very detailed in the matters it covers setting the quantities of development that will be permitted for employment. These are split between the 'Urban Development Strategy Area' and 'Rural Development Strategy Area'. Parts of the policy relating to the over employment requirements relating to population growth and reducing out-commuting levels is repeating criteria already set out in policy EMP/1.

One of the principle ways that a development plan can influence long-term sustainable development is by locating new employment near places that are easily accessible for where people live now (and is planned in the future). This helps make sustainable patterns of growth where there is good access to employment without the need to travel by car. The benefits of which are:

- supporting a stronger sense of local community
- greater equity of access to work as people are not excluded simply because it is too difficult to access employment sites without a car
- a reduced impact on the natural environment from less car travel, including mitigation of climate change and improving air quality, and
- economic benefits from reduce congestion on the roads for freight movement.

It is clear that there is an intention for the Conwy spatial strategy to support this approach of more sustainable patterns of growth. The majority of new employment in to be located in the more accessible parts of the County Borough, in the urban development strategy area. The sustainability implications of the quantity of development is covered by the sustainability appraisal of policy EMP/1 and is relevant here.

Allowing employment development in the rural areas can help support local employment. However, this should always be of a scale to meet jobs needs of rural communities. Access to jobs in rural locations is most likely to be by car, therefore it is important to make sure these developments do not give rise to unsustainable travel patterns.

The way that contingency sites will be bought forward when identified trigger points have been reached and it can be shown that employment objectives are not being met. Such situations include:

- the current allocations of the Deposit are not coming forward for development and economic growth is stalling
- sites could be bought forward if employment growth has been rapid and sites are becoming scarce.

Where either situation arises to achieve sustainable patterns of development and create functioning local neighbourhoods it must be made sure that employment growth is being phased with housing growth and community infrastructure provision. A clear strategy for releasing contingency sites is

essential to be able to control their release. Without structured policy guidance developers could push for early release of sites working against what is identified as the spatial strategy for the County Borough.

Controlling release of contingency sites may be made harder if un-allocated sites on the urban periphery are being given permission for development prior to release of contingency phases.

Recommendations including mitigation:

- Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction
- The policy needs to be made more understandable, currently it is difficult to tell what the overall strategy for employment is, and how decisions on an application coming forward on an unallocated, or phased allocated site, would be made
- The way contingency sites will be released and prioritised needs to be made clear in planning policy to control their delivery and make clear to developers that early applications will be refused.

Implications of policy revisions

The policy has been substantially revised from the previous versions and is now more succinct. One of the greatest changes in the quantity of employment allocated for development and the way the way that it has been allocated. As noted in the sustainability appraisal of policy EMP/1 the reduced quantity of allocated land may be a positive step in securing a more sustainable spatial strategy. However, the allocation is still well above existing levels of demand.

The revised policy ~~now contains~~ has removed the criteria on permitting development of non-allocated employment proposals and put it in a new policy EMP/3.

Policy EMP/3

New B1, B2 & B8 Office and Industrial Development on Non-Allocated Sites

This policy sets out the criteria against which non-allocated sites can come forward for employment use within the borough.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	-	?	?	?	?	-	?	-	-	-	•	?	•

Sustainability commentary and significant impacts

This policies permits non-allocated sites to come forward for employment, thereby ensuring that employment land is delivered. It required proposals to demonstrate that the proposal could not be accommodated on land allocated. This evidence needs to be robust to ensure that the identified strategy is delivered, thereby delivering housing and employment in the most sustainable locations.

One of the principle ways that a development plan can influence long-term sustainable development is by locating new employment near places that are easily accessible for where people live now (and is planned in the future). This helps make sustainable patterns of growth where there is good access to employment without the need to travel by car.

To achieve sustainable patterns of development and create functioning local neighbourhoods it must be made sure that employment growth is being phased with housing growth and community infrastructure provision.

The sustainability appraisal queries the release of this land that allows new employment development on non-allocated sites adjacent to the main built up areas. The choice of sites for employment *allocations* beyond urban boundaries has been based on a thorough review of available sites, leading to the identification of those that are best able to implement the spatial strategy. Allowing development that has not been through these processes may undermine this approach and lead to the development of less suitable sites. A policy criteria does specify that land

should not be released if suitable allocations are available and this should include contingency sites.

Recommendations including mitigation:

- Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction

Implications of policy revisions

New policy. The policy now contains criteria on how non-allocated employment proposals will be managed, the policy was previously part of EMP/2.

Policy EMP/4

Safeguarding B1, B2 & B8 Office and Industrial Sites

The policy sets out the control for protecting employment land in the County, and providing tests for the exceptional circumstances in which the loss of employment land would be granted.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	•	•

Sustainability commentary and significant impacts

Protecting employment land which is needed to provide jobs now and in the future is important to retain and enhance sustainable communities, where land might otherwise have pressure from other, more profitable, land uses such as housing. This is a positive policy and is important to the future sustainable development of the County.

The policy requires the applicant to demonstrate there would be no significant impact on the overall supply of employment land and premises if a development would lead to the loss of existing and committed employment land or premises. Again, this is a good approach to protecting employment land.

Recommendations including mitigation:

- Protecting employment land and premises is important in retaining jobs in the County and providing for sustainable communities, and this policy is important in ensuring employment land is not lost to other uses.
- Supporting text should provide brief guidance on the type and content of evidence that should be submitted with a planning application, where the development would lead to a loss of existing and committed employment land and premises.
- This should include an explanation of the meaning 'strategic' in relation to the Council's expectations relating to impact on overall supply of employment land and premises.

Implications of policy revisions

The policy has been amended by Focused Changes to include more information on the detail that an applicant would have to provide to achieve a change of use from employment. This should be beneficial in protecting the employment land bank.

Policy EMP/5

Office and Industrial Employment Improvement Areas

This is a new policy which sets out the office and industrial employment sites which the Council want to promote and improve.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	-	-	-	-	-	?	-	-	-	?	•	•

Sustainability commentary and significant impacts

Improving employment sites is a positive policy and is important to provide economic diversity and increase the attractiveness of employment sites to existing and new businesses.

Recommendations including mitigation:

- Improving employment land and premises is important in retaining jobs in the County and providing for sustainable communities, and this policy is important in ensuring employment land is retained and improved.

Policy EMP/6**Re-use and Adaptation of Redundant Rural Buildings**

The policy sets out the development control criteria for permitting the employment use of redundant buildings in rural areas.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
x	-	-	-	?	?	•	-	x	-	-	x	-	•	•	?

Sustainability commentary and significant impacts

The policy allows for the development of redundant rural buildings for new business, providing criteria relating to retaining the character of the building and surrounding area. It repeats much of policy HOU/12 and these 2 policies could be merged.

The criteria of the policy should help to make sure that impacts on the countryside and landscape are controlled. Landscape character appraisal should also ensure that the visual impact of this type of proposal is mitigated, essential to preserve the character of the countryside.

Recommendations including mitigation:

- A single policy on re-use and adaptation on redundant rural buildings could create a more succinct plan, covering all types of use including housing and employment.

Policy **EMP/4 Promoting mixed use employment land** has been deleted.

Policy **EMP/5 Expansion of B1, B2 & B8 Businesses** has been deleted.

6 Tourism

Policy TOU/1 and TOU/2															
Tourism & Location of New Tourism Development															
The policies outline the aims of the Council to provide a year round tourist season, while protecting the natural and built environment. The policy links to other policies within the LDP, such as TOU/3, TOU/4 and TOU/5. Improving connectivity by supporting the delivery of existing strategies is also covered in TOU/2.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	?	?	?	-	-	-	-	-	-	-	•
Sustainability commentary and significant impacts															
The intention of the Council is to promote a year round tourist season, while protecting the natural and built environment. As with other policies at the start of a policy chapter much of TOU/1 simply provides a cross-reference to other policies of the section.															
Promoting connectivity in relation to specific local projects will improve access to the County, providing enjoyment for both locals and visitors.															
The policy does not provide a clear spatial strategy for tourism in Conwy, specifically relating to what is acceptable inside and outside development boundaries, and what scale and types of tourism facilities/accommodation would be permitted. Therefore it is unclear, in sustainability terms, to judge whether this policy would lead to sustainable development in rural areas.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • The LDP could provide a clear spatial strategy (for inside and outside development boundaries) for tourism development. This should provide policy criteria for new accommodation and facilities, as well as for the expansion of existing facilities. It should also outline the suitable scale and expected standards for locations in Conwy. • All criteria that cross referenced to policy that already exists should be deleted from the policy. Links to other policy should be provided within the supporting text. 															
Implications of policy revisions															
The policy numbering has been changed to reflect a new section of the LDP specifically on tourism. There are no implications for sustainable development. However, the sustainability appraisal commentary on the policy has been expanded to refer to the need add site specific detail to some elements of the tourism policies in order to improve the offer in some areas.															

Policy TOU/3															
Holiday Accommodation Zone															
The policy provides for the protection of serviced bedspaces for tourism in an area identified on the proposals map.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	-
Sustainability commentary and significant impacts															
Protecting tourism accommodation in a location that has suffered a loss of accommodation to other uses will help to retain and encourage tourists to the area and help the local economy.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It is unclear what evidence has been used to justify this policy. Reasoned justification should be provided within the supporting text. Change of use from tourist accommodation to other uses should be carefully monitored. This will help the Council monitor how successful the policy is being implemented and whether it is contributing to the creation of a sustainable community. 															

Policy TOU/4															
Chalet, Caravan and Camping Sites in the Urban Development Strategy Area															
The policy restricts the development of new and improvements to chalet, caravan and camping sites in the urban development strategy area. No new sites or expansions to existing sites are to be permitted. It does allow for improvements to existing sites, as long as development does not increase the number of caravans / chalets and development to a high standard. A biodiversity statement is also required.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	•	?	?	-	-	?	-	-	-	?	?	-
Sustainability commentary and significant impacts															
The policy itself restricts the growth of existing facilities and provision of new sites, which will protect the further expansion into the countryside and potential to ruin the local landscape character, which has been a problem in the past.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Supporting text should explain that the design and landscape policies will be stringently applied to any policy on these sites, particularly those in rural locations. Some of the policy criteria of TOU/5 could be incorporated in this policy, such as the scale of development permitted and the need to protect landscape quality. 															
Implications of policy revisions															
The revised policy now requires a Biodiversity Statement to accompany any application. This provision should help enhance biodiversity in this area where high concentrations of this type of development could be having adverse impacts on nature conservation. The revised policy also means that applications for this type of development will be subject to separate criteria in the Urban and Rural Development Strategy Areas.															

Policy TOU/5															
Chalet, caravan and camping sites in the Rural Development Strategy Area															
This policy sets the criteria for this type of development in the rural area. The policy makes clear that this type of development is only allowed as an extension to an existing tourism site and that the															

development is small and does not harm the natural environment.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	•	?	?	-	-	-	-	-	-	?	?	-
<p>Sustainability commentary and significant impacts</p> <p>The policy should help in the control of this type of development restricting it to very limited expansion of existing tourism sites. The criteria of the policy should help to make sure that impacts on the natural environment are controlled, including how biodiversity gains will be achieved through the development of the site. Landscape character appraisal should also ensure that the visual impact of this type of site is mitigated, essential to preserve the character of the countryside that is the very reason that people choose to visit.</p> <p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> • None 															
<p>Implications of policy revisions</p> <p>This is a new policy, in the previous version there was no separation of the type of development in rural and more urban locations. The separation allows the particular characteristics of each area to be taken into account and the differing needs in terms of protection of the natural environment.</p>															
<p>Policy TOU/7</p> <p>Tourism and recreation development</p> <p>This policy sets the general principle in support of schemes that help connection with the local environment. The policy also safeguards land at the former Dolgarrog Aluminium Works for tourism and recreation.</p>															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	•	?	?	-	-	-	-	-	-	?	?	-
<p>Sustainability commentary and significant impacts</p> <p>Supporting access to the natural environment is positive for sustainable development. There can be many benefits of good access to the natural environment, both related to environmental understanding and as part of a healthy lifestyle. Tourism access is also an important part of the local economy. However, it is difficult to see how applicable criteria 1 will be in making planning decisions as it is complexly and ambiguously worded.</p> <p>The Dolgarrog Aluminium Works is well suited for tourism and recreation related development due to its location in the rural area and access potential by train. Other types of employment use in this remote location are unlikely to be compatible with sustainable development.</p> <p>If there are other specific locations or allocations where tourism and recreation use will be prioritised or will be part of a mix of uses this should be recognised in this policy. For example, the supporting text of TOU/1 and TOU/2 mention the need to safeguard and improve Foryd Harbour but this is not covered by allocations or policies.</p> <p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> • Wording improvements to criteria 1 could help ensure its effectiveness in helping to make planning decisions • Where other specific sites will be the focus for new tourism or recreation related development these should be addressed in LDP policy. 															
<p>Implications of policy revisions</p> <p>This is a new policy.</p>															

7 Community facilities and services

Policy CFS/1															
Community facilities and services															
This policy simply lists as criteria the policies of this section.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	?	-	-	-	-	-	-	-	-	?	-	?	?	•
<p>Sustainability commentary and significant impacts</p> <p>The wording of this policy does not provide criteria against which a planning application can be assessed. The policy 'criteria' simply cross-reference other policies of this section. This duplication is unnecessary and the policy could be removed with no impact on the delivery of community facilities and perhaps with some benefits of creating a more concise LDP.</p>															
<p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> This policy is likely to be unnecessary and only serves to duplicate other policies of the plan, it could be deleted. 															
<p>Implications of policy revisions</p> <p>There are several new criteria in the policy, but as with other policy criteria are simply cross-referencing other policies.</p>															

Policy CFS/2															
Retail hierarchy															
This policy sets the retail hierarchy which will determine the level of new shopping provision. The policy states that the hierarchy will determine the level of retail development direct to each – but only 'generally' so.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	?	?	-	-	-	?	?	-	-	-	?	-	?	?	•
<p>Sustainability commentary and significant impacts</p> <p>The level and location of retail development has a large impact on travel patterns and is a spatial planning issue. Ideally all retail should be located in the centres of larger settlements, where there is better access by a range of transport modes. There is also the need to provide and protect smaller shopping centres in neighbourhoods and village to meet very local needs, within walking distance of people's homes.</p> <p>This policy does not give any quantities of development that will be located to these areas, and provides little certainty to developers on what type of development will be allowed in which locations. Policy wording includes terminology including 'generally determine' and 'more likely', which may risk not being sufficient to protect the character of existing retail locations if applications do come forward.</p> <p>Therefore, it is not possible to say with any certainty the exact impacts of this policy would be on the levels of development delivered. The policy should also identify where in the settlement new retail should be located, taking into account the need to focus retail in the most accessible locations that reduce the need to travel by car.</p> <p>The policy could contain more of a sequential strategy to the location of new retail facilities within the existing towns. This strategy could prioritise town centre locations, then edge or centre, and avoid out-of-centre retailing. Currently a risk to maintaining sustainable local centres comes from increased amounts of out-of-town retailing, or car focused shopping centres, and large supermarkets with free car parking. This can cause the closure of local shops that can have a</p>															

detrimental impact on community character, and cause inequity of access to essential services for those without a car and could exacerbate issues of rural isolation for those on lower incomes and the elderly.

Recommendations including mitigation:

- Including some quantification of the type of development in each location may help to make sure this development supports a sustainable spatial strategy
- The policy should avoid ambiguous wording in order to provide the necessary policy tools to reject inappropriately located development, including criteria in this or other policies on making decisions on retail applications on unallocated sites.
- The policy, or other policies of this section, should follow a sequential approach to location, favouring town centre, then edge-of-centre locations.
- Specific policies should be included on the measures that are need to reinvigorate or manage change in identified major centre, including regeneration, heritage protection and improving access by non-car modes.

Implications of policy revisions

There have been changes to the role of some of the centres identified in the policy. Previously there were five categories of centre and now only four. As there are no definitive levels of development directed to each area this change is unlikely to have a major impact, the simplification allows similarly simple criteria to be established on the type and scale of development directed to the levels.

Policy CFS/3

Primary shopping areas

This policy seeks to protect the retail use of the town centres, avoiding change of use to protect amenity and retail function.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	-	-	-	-	•	•	-	-	-	•	-	?	-	?

Sustainability commentary and significant impacts

This policy should help protect the primary shopping areas for this function, and this will be an important component of retaining shopping in accessible locations and the continuation of the use of these areas for retail in the long-term.

Recommendations including mitigation:

- No recommendations

Implications of policy revisions

The policy revisions may help improve the protection of A1 uses by including more detail on the controls that will help prevent the change of use.

Policy CPS/4

Shopping zones

This policy seeks to protect allow change of use away from A1 in defined locations if it maintains or enhances the area.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	?	-	-	-	-	?	•	-	-	-	?	-	?	-	?

Sustainability commentary and significant impacts

This policy seeks to make sure that the 'vitality, attractiveness and viability' of shopping centres is protected by controlling the loss of A1 uses. It is not clear how the impacts of change of use against these three criteria will be managed, and it is hoped that this policy will be tightly controlled

to avoid harm. For instance, there may be harm to amenity of areas if there was too much change of use from shops to bars and hot food takeaways.

The other types of permitted use in these areas should be made clear in the policy, for instance A2-A5 uses, and which uses would not be permitted, i.e. residential reuse. This would give greater certainty to developers on what is allowed, and also the tools to those making decisions on applications to refuse in appropriate types of reuse. It would be unfortunate if these policy led to the loss of essential town and village retail centres.

Recommendations including mitigation:

- The policy should be more clear on what types of change of use would and would not be permitted to provide greater certainty in the policy and avoid loss of accessible retail uses, particularly attention should be made to avoiding change of use that is unlikely to be reversible i.e. to a dwelling
- All the 'shopping zones' are in 'town centres' (CPS/2) for simplicity the policy could state this
- This policy could be combined with CPS/3

Implications of policy revisions

The locations of 'shopping zones' have been revised to include only 'town centre'. In terms of sustainable development this would appear suitable given the need to protect the vital function of these areas in the County Borough.

Policy CPS/5

Retail parks

This policy sets out the need to safeguard the existing retail parks in central Llandudno for large stores and bulky retail.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	-	-	-	-	?	?	-	-	-	?	-	?	?	•

Sustainability commentary and significant impacts

These retail parks are in central Llandudno and therefore have relatively good access to public transport, including the train station. However, these centres are primarily focused around car access with large areas of free car parking.

It may be suitable to require that any new development on these sites includes measures to help move away from car dependence, and could include reduction of car parking space. In addition, any changes should aim to strengthen links to the traditional shopping streets of Llandudno, essential to retain the character of the area and sites suitable for local shops and businesses.

Recommendations including mitigation:

- The policy could include criteria that seek any new development in this location to ensure good cycle, walking and public transport links to the site and perhaps future parking managed on the site help avoid prioritising car use
- Any new development at this site should aim to strengthen links to the traditional shopping areas of Llandudno to help protect local retail facilities and the character of the town

Policy CFS/6															
Safeguarding of Community Facilities Outside Llandudno, Colwyn Bay and District Centres															
The policy provides for the retention of convenience shops, post offices, petrol stations, village/church halls and public houses outside the main settlement centres. Where a loss of one of these facilities will be permitted the applicant is required to provide evidence that the building is no longer viable.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Retaining community facilities in neighbourhoods, villages and rural locations promotes access to facilities for communities that live in more remote locations, and helps people to remain living in their local area.															
Evidence is required from the applicant where they apply to change the use of a community facility to another use. Requirements relating to the evidence are outlined in the supporting text, stating that it should be clearly demonstrated that the community facility is not viable for a minimum of 12 months at a realistic price and that there is no community need for the community facility. This allows for change of use, but also ensures that where possible these key community facilities are retained.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> This is a positive policy which seeks to retain community facility in less sustainable locations than the key retail centres of Conwy. 															
Implications of policy revisions															
The policy in the Focused Changes version includes all types of facilities that should be protected, previously it was only shops. This is positive change in meeting sustainability objectives relating to community and wellbeing.															
Policy CFS/7															
Shop Front Design															
The policy is a design criteria for shop fronts, which states they should be in keeping with the building and its surroundings.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	•	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Enhancing shop frontages and ensuring they are in keeping with the building and its surroundings is a positive approach to securing high quality design. However, all development should be required to deliver high quality design and enhance any building that it affects and its surrounding context, especially if it is within a historic or landscape context. This should not only apply to shop fronts, but could apply to all development proposals.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> This policy could be deleted. These are design and historic environment concerns which should be within these detailed policies. If shop front design is a specific concern, then the Council could provide further shop front design guidance, to explain what the key issues are in Conwy and how future proposals could help to retain the character of retail shop frontages. 															

Policy CFS/8 Shop Front Security															
The policy does not permit the installation of solid or perforated roller shutters on the front of shops and other properties on shopping street frontages.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	•	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Suitably designed shop fronts can preserve the character of buildings and the shopping street scene, and this is particularly important within Conservation Areas. Decisions on the suitability of shutter should take into account the night time attractiveness of town centres, particularly where an are will the focus for restaurants, and bars.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Policy criteria relating to shop front design could be provided within the overall design policy, with detail guidance provided within shop front guide or SPD. This would allow for more detailed information about the local distinctiveness of shop fronts in Conwy, and expectations of development to retain the local character. 															

Policy CFS/9 Safeguarding Allotments															
The policy restricts the loss of land used for allotments, and also provides exceptions where it could be possible to use allotment land for development, where provision is provided elsewhere or there is no longer a need for the allotment.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	?	-	?	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Retaining allotments is a positive approach as they provide an important community facility as a recreational activity and provide locally grown food which helps to improve health and well-being, as well as providing biodiversity benefits, and some benefits related to the environmental impact of food transport.															
The policy makes an exception to retaining allotments where it can be demonstrated that there is no longer a community need for the allotments. The policy and / or the supporting text does not provide guidance to the applicant on what the test will be to prove that there is no longer a community need. If the test is not stringent then this could lead to the loss of allotments and therefore a key community facility and biodiversity benefits.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Retaining allotments is a benefit to the community and potential biodiversity which is a positive approach. However, it is important that the test used to allow allotments to be developed where there is no longer a community need should be stringent, and consider the future and possibly changing trends in allotment demand. 															

Policy CFS/10 New Allotments															
The policy allocates 5 new allotment sites in the County.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	•	•	-	•	-	-	-	-	-	-	-	-	-	-	-
<p>Sustainability commentary and significant impacts</p> <p>Providing new allotments is a positive approach as allotments provide an important community facility as a recreational activity and provide locally grown food which helps to improve health and well-being, as well as providing biodiversity benefits.</p> <p>Revised Background Paper (BP) 25 'Allotment Site Demand and Supply Report' (August 2012) explains why previously considered sites are now not listed within policy, because they were not deliverable. The Paper now lists 5 new sites and considers the deliverability of each site.</p> <p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> • Providing new allotments is a benefit to the community and potential biodiversity which is a positive approach. • There are 2 policies in the LDP for allotments. It could be possible to merge the 2 policies to reduce the number of policies in the Plan. • Sites allocated, within the LDP, for allotment use should be deliverable. <p>Implications of policy revisions</p> <p>The allocated sites for allotments have changed since the previous version of the Deposit. Any allotment allocation needs to be backed up by certainty of its delivery, including funding sources. All five of the allotments allocated in the Further Changes LDP are new, replace four previous allocations. The towns/villages in which allotment allocations are made has also changed, for instance no allocation in Rhos on Sea and new allocation in Abergele. It is therefore not clear if allotments are allocated to meet identified demand or just in available locations.</p>															

Policy CFS/11 Development and Open Space															
The policy sets out the requirement of new housing development make on site provision for open space, including amenity and play space. It does allow for a commuted sum to provided instead, but only in exceptional and justified circumstances or sites of less than 30 new homes.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	•	•	-	•	•	-	-	-	•	-	-	-	-	-	•
<p>Sustainability commentary and significant impacts</p> <p>These policies provide a sound basis for providing new play space, amenity and outdoor sports facilities for new residential development. This will ensure that key open space facilities support the local community and are provided within new developments, or a commuted sum is provided where it may be more appropriate to provide the facility elsewhere.</p> <p>Open space contributes to quality of life, health and well-being of the local community, and it is important to distinguish between amenity space, play space and sporting facilities, to ensure a wide range of people in the community are provided for. It can also have benefits to protect landscape character where open space is on the urban fringe and potentially provide for biodiversity.</p> <p>It may be more beneficial in some communities to have a supply of larger play areas and / or sports facilities. In these circumstances a commuted sum may be a better suited situation in order to deliver these large facilities. This obviously would depend on the local circumstances and deficiencies identified in the forthcoming Open Space Audit and Assessment, and any assessments completed relating to sport pitch facilities.</p>															

In addition, some sites of less than 30 dwellings should be allowed to have on-site provision if this fits the space better than off-site provision. There need to be clear management policies in place to manage commuted money to ensure that it is used within a reasonable timeframe to create new sites. Policy CFS/13 allocates land for new open space that can be provided through contributions. However, identification of other sites will be necessary to ensure new open space is delivered near to new homes.

Recommendations including mitigation:

- This policy could also be merged with CFS/12 Safeguarding Existing Open Space, with CFS/13 criteria being at the forefront of the policy providing the platform of retaining open space in the County. This would contribute to reducing the number of policies in the LDP.

Implications of policy revisions

Previously this policy appeared as two policies CFS/11 and CFS/12, the SA suggested that they be merged. Previously the two policies referred to sites of fewer and sites of more than 5 new homes. This has now been replaced by a single requirement for on-site provision on sites of 30+ and commuted off site provision where less than 30 are proposed. This method should make it easier for developers to know what is expected from them to incorporate into design schemes and financial budget.

Policy CFS/12

Safeguarding Existing Open Space

The policy retains existing open space. It provides the tests for the loss of open space to be permitted, where there is an over-provision and it can be demonstrated there are significant community benefits from the proposed development, or alternative provision will be provided within the local area.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	•	•	-	•	•	-	-	-	•	-	-	-	-	-	•

Sustainability commentary and significant impacts

Open space contributes to quality of life, health and well-being of the local community, and it is important to distinguish between amenity space, play space and sporting facilities, to ensure a wide range of people in the community are provided for. It can also have benefits to protect landscape character where open space is on the urban fringe and potentially provide for biodiversity.

The policy provides for open space to be developed with a number of tests. It is important that the tests are robust and that the Council are able to provide guidance on what evidence is required from developers who potentially may want to apply for planning permission on existing open space.

Recommendations including mitigation:

- The policy is a positive approach to protecting existing open space.
- This policy could be merged with CFS/11 and CFS/12, with CFS/13 criteria being at the forefront of the policy providing the platform of retaining open space in the County.

Policy CFS/13

New open space allocations

The policy lists two sites allocated for new open space. New land may be identified also during the plan period.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	?	•	-	?	?	-	-	-	?	-	-	-	-	-	?

Sustainability commentary and significant impacts

Allocating sites will help make sure that contributions from housing development will be effectively spent on the provision of new open space. For this reason it may be suitable to identify sites throughout the County Borough so that all contributions can be spent on new local open spaces, ideally a walkable distance from new homes.

The allocated sites identified in the policy is explained within Revised Background Paper (BP) 19 'Open Space Assessment' (August 2012).

As listed in the SA of policy CFS/11 there are many advantages of providing good quality open space. The policy does not state what the open space use will be on these designations. However, any development should ensure biodiversity is not harmed (for example through change of semi-natural habitats to managed playing fields), landscape is protected and the site has good non-car access.

Recommendations including mitigation:

- Additional open space allocations need to be made throughout the plan area, to make up the shortfall created by the removal of one previously allocated site and to meet overall needs.
- The type of open space provided should meet local needs and existing shortfalls.
- The impact on landscape and nature conservation of converting semi-natural areas to managed open space should be recognised and sites planned accordingly.

Implications of policy revisions

This policy is new in the 2011 Deposit. The allocation of land for open space is positive in ensuring off-site open space provision paid for by developer contributions is actually delivered. Allocation will also protect these spaces from loss to alternative uses.

The Focused Changes removed one allocated site, which could have implications for delivery of sufficient open space to meet the needs of community's. The Council will need to identify an additional space for allocation.

Policy CFS/14**New burial ground**

Two new burial grounds are allocated at Llanwrst and Penmaenmawr.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Sustainability commentary and significant impacts

Providing sufficient local and accessible burial grounds is an essential service. The development of sites for this use should not overlook the potential of these largely open spaces for quiet recreation and for biodiversity.

Recommendations including mitigation:

- None

Implications of policy revisions

This is new policy in the 2011 Deposit. An additional allocation was added in Focused Changes 2012. It should be ensured that allocations are made to make the best use of land.

Policy CFS/15**Education facilities**

Policy on providing education facilities.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3

?	-	-	-	-	-	-	-	-	-	-	-	-	-	?	-
<p>Sustainability commentary and significant impacts Provision of education facilities is an essential part of creating a sustainable future for the County Borough. Helping people of all ages gain the skills they need to get on in life and for find meaningful employment. However, this policy is likely to be surplus to needs, it adds no detail how these will be delivered in the County Borough.</p>															
<p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> • The need for education facilities should be kept under review and sites identified during the plan period if needed. • This policy could be deleted. 															
<p>Implications of policy revisions This is a new policy, it has no sustainability implications.</p>															

8 The natural environment

Policy NTE/1															
The Natural Environment															
The wording of this policy does not provide criteria against which a planning application can be assessed. The policy 'criteria' simply cross-reference other policies of this section. This duplication is unnecessary and the policy could be removed with no impact on the impact of the plan on natural environment protection, and perhaps benefits of creating a more concise LDP. .															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	?	-	?	?	-	-	-	?	-	?	-	-	-	-
Sustainability commentary and significant impacts															
The wording of this policy does not provide criteria against which a planning application can be assessed. It reads more like an introductory list to the policies which follow in this section of the LDP. Each bullet point refers to individual policies and the text repeats elements of each of these policies. Without clear development management policy criteria it may actually confuse potential applicants, and therefore potentially detract from the positive approach the Council seek to take on development affecting the natural environment.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> The requirement for development outlined in this policy is provided clearer within the following policies, within the same section of this LDP. Therefore this policy should be deleted. 															

Policy NTE/2 and NTE/3															
Green wedges and meeting the development needs of the community															
This policy names the green wedges that will be protected from development to prevent coalescence of settlements.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	•	?	?	?	•	?	?	-	?	-	-	-	-	-	-
Sustainability commentary and significant impacts															
These green wedge sites have been identified to prevent the identified sites from coalescing. This can help protect the community character of some areas and their identification as distinct settlements. These green wedges can also have benefits for the quality of the landscape and biodiversity. However, this will depend on the existing quality of the sites, as they are designated for 'openness' rather than protection of quality assets.															
The green wedges have been reviewed for the LDP and as a result some of the sites have been reduced in size to accommodate growth. Some additional sites have also been added to protect the coalescence of other settlements. The changes indicate that these green wedges are not entirely fixed and in the future their boundaries could be revised again.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> These two policies should be combined, as they are all 'green wedges' subject to the same degree of protection The policy should states what the policy protection controls are in these locations The policy should avoid stating what the changes are from the previous version, as this is not a policy matter and could be incorporated into the reasoned justification instead 															

Policy NTE/4 Biodiversity															
The policy sets out criteria to protect biodiversity from development, and sets out that mitigation measures should be applied where development would have an impact on biodiversity.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	•	-	-	-	-	•	-	-	-	-	-	-
Sustainability commentary and significant impacts															
The SA supports this policy and the requirement to retain and enhance biodiversity. Recognising the importance of biodiversity on all potential development sites is essential in preserving the overall biodiversity of the area. Often back-garden or regenerated previously developed sites can have much higher biodiversity value than areas of greenfield land.															
Conwy has many sites of international importance for nature conservation designed in and around its boundaries. Development has the potential to adversely affect these sites if inappropriately located or not subject to suitability mitigation measures. The Habitats Regulations Assessment undertaken of the LDP raises the policies and allocations where there is for impacts. Therefore, it may be suitable for this policy to include a criteria on the need for development in proximity to these sites recognise the important of their location and deliver development to avoid and mitigate potential impacts. This would not mean repeating national policy as it would focus on the local implications of protecting internationally designated nature conservation sites in Conwy.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It is important to highlight criteria 3 of the policy which indicates that there should be 'no net loss of biodiversity' in development. This is achievable through landscaping and planting and retention of biodiversity within development. Policy should include reference to the protection of the integrity of internationally designated nature conservation sites in and around Conwy. 															

Policy NTE/5 The Landscape and Protecting Special Landscape Areas															
The policy seeks to protect the local landscape character of the County and individual Special Landscape Areas															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	•	•	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Protecting and enhancing landscape character is important in Conwy which is a mainly rural County. The policy is a positive approach to providing development within the landscape, which should provide development well designed within the landscape. It should also help to implement policy DP/3 Promoting Design Quality and Reducing Crime.															
The policy and supporting text is locally distinctive to Conwy and outlines the most distinctive and unique landscapes exist in the County. Basing the landscape protection areas on work done nationally as part of Landmap should help protection those areas highest quality within Conwy County Borough.															
The policy mainly relates to the measures that development that development proposed in Special Landscape Area will have to comply with. This includes requirements for landscape character assessments in 'appropriate cases'. However, the plan is not clear when this will be required and how 'appropriate cases' will be determined. Furthermore, the policy gives little detail on how landscape character should be protected outside the Special Landscape Areas, with the exception															

of a statement that proposals must be considered against other policies.

Recommendations including mitigation:

- It would be beneficial if the policy provided criteria which protected landscapes outside Special Landscape Areas from development impacts.
- Reference to other policies is unnecessary as all development proposals would have to take into account all relevant policies of the plan.

Policy NTE/6

The coastal zone

This policy relates to the protection of the coastal zone from inappropriate forms of development.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	-	-	•	•	?	?	-	-	-	-	-	-	-	•

Sustainability commentary and significant impacts

The coastal zone is a major asset of the County Borough, making a contribution to the economy and the quality of the area. Protecting this area from unsuitable uses is positive in terms of seeking greater sustainable development.

Recommendations including mitigation:

- None

Implications of policy revisions

This is a new policy and its inclusion may help protect this valuable asset.

Policy NTE/7

Energy Efficiency and Renewable Technologies in New Development

The policy sets the strategic policy relating to energy efficiency renewables in new development, providing links to all other policies within the plan.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	-	-	-	-	•	-	-	•	•	-	-	-

Sustainability commentary and significant impacts

The efficient use of natural resources and use of renewable technologies in new development are a central concept of sustainable development, by reducing the need for natural resources and mitigating against climate change. Including renewable technologies within new development help to meet the Wales targets for renewable energy generation.

The policy may help support more resource efficient development if positively applied to ensure all development proposals have demonstrated how they have taken into account reducing resource use in construction and operation.

Consideration should also be given to consider decentralised energy schemes for large new development schemes, including residential development, in larger industrial/employment or mixed use development.

Recommendations including mitigation:

- This policy provides introductory text to other policies in the LDP and therefore no extra mitigation measures are provided by the Sustainability Appraisal.

Implications of policy revisions

The policy criteria provide introductory text to other policies in the LDP. Although the policy is positive in sustainability terms, it does repeat policy criteria set out in other policies.

Policy NTE/8

Onshore wind turbine development

The policy sets the principles for on-shore wind turbine development covering large scale turbines inside the SSA, and small scale wind farms outside the SSA.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	-	-	•	•	?	?	-	-	-	-	-	-	-	•
<p>Sustainability commentary and significant impacts</p> <p>The identification of SSA in Wales should mean that turbines in these locations can be relatively fast tracked for development as there is already agreement in principle that the site is suitable. To meet Wales targets for renewable energy generation it is essential that this type of development is not subject to unnecessary delay in delivery, taking into account the national and international benefits of these schemes in comparison to local concerns, particularly related to visual quality. The policy criteria appear appropriate to avoid the adverse impacts of these types of scheme, although there may be a need to define thresholds for cumulative impacts.</p> <p>Consideration should also be given to single larger turbines to provide decentralised energy for large new development schemes, including residential development or in large industrial/employment development. The role of other low carbon and renewable energy generation should also be considered.</p> <p>Under this policy, small scale wind turbines will be permitted for development for residential, employment and commercial development. This will contribute to reducing carbon emissions, but must should not have any significant landscape impact.</p> <p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> Defining cumulative impact thresholds may help prevent this type of impact. There is no policy on other types of low carbon or renewable energy technology. Policy should cover how this type of development would be addressed. This will include the need to incorporate decentralised heat and/or power networks into new development. This can either be part of the development of large allocations, or groups of allocations or as part of development co-location. Low carbon energy generation is strongly promoted through national WAG policy. <p>Implications of policy revisions</p> <p>This is a new policy and should help control the delivery of this type of development so as not to harm the natural environment yet help secure delivery of on-shore wind turbines. The policy was revised for accuracy when updated to the Focused Changes version.</p>															

Policy NTE/9															
Sustainable Drainage Systems															
The policy requires all development to use sustainable drainage systems, and to justify where discharge is necessary.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	•	-	-	-	-	-	•	-	-	-	-	-
<p>Sustainability commentary and significant impacts</p> <p>Minimising water discharge from new development reduces the risk of flood and potential pollution. In sustainability terms, this can help to protect people's homes and businesses thereby retaining health and well-being, as well as protect the natural environment from flood risk and water pollution from surface run-off.</p> <p>Recommendations including mitigation:</p> <ul style="list-style-type: none"> This policy meets the objectives for avoiding run-off of potential polluted water to water courses or aquifers. A specific policy on flood should be included in the LDP. 															

Policy NTE/10 Foul Drainage															
The policy requires that where foul drainage can not be to a public sewer that there should not be unacceptable risk to watercourses or biodiversity. It also provides for capturing water from hard surfaces to safeguard the water environment from pollution.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	•	-	-	-	-	-	•	-	-	-	-	-
Sustainability commentary and significant impacts															
Within such a rural County it is important to ensure development with non-adopted sewer systems does not pose an unacceptable risk to the quality or quantity of water to the water environment or biodiversity.															
Minimising water discharge from new development reduces the risk of flood and potential pollution. In sustainability terms, this can help to protect people's homes and businesses thereby retaining health and well-being, as well as protect the natural environment from flood risk and water pollution from surface run-off.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • The SA has no recommendations for this policy. 															

Policy NTE/11															
Water Conservation															
The policy requires water conservation measures in all developments and a Water Conservation Strategy for larger developments.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	•	-	-	-	-	-
Sustainability commentary and significant impacts															
Ensuring new development incorporates water conservation help to adapt to climate change where water resources will reduce. Requiring a Water Conservation Strategy with planning applications will help applicants to focus on how their proposals meet sustainability objectives relating to water conservation. The forthcoming SPG will inform potential developers of water conservation methods.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It will be important to provide applicants with guidance on what is required within the Water Conservation Strategy, to ensure that the sustainability objectives relating to water conservation is maximised. 															

9 Cultural heritage

Policy CTH/1 Cultural Heritage															
The policy outsets the Council's intentions to protect and enhance cultural and heritage assets.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	?	?	?	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
The wording of this policy does not provide criteria against which a planning application can be assessed. It is a list of actions for which the Council will take in assessing planning applications. Each bullet point refers to individual policies and the text repeats elements of each of these policies. Without clear development management policy criteria it may actually confuse potential applicants, and therefore potentially detract from the positive approach the Council seek to take on development affecting cultural heritage.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> The requirement for development outlined in this policy is provided clearer within others policies, within the same section of this LDP. Therefore this policy should be deleted, and if required could be used as supporting introductory text to this section. 															

Policy CTH/2 Development Affecting Heritage Assets															
The policy seeks to preserve or enhance the historic environment within designations.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	•	•	•	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Development affecting the setting of the designated historic environment is also required to preserve or enhance that setting. This is a positive approach to retaining and improving the historic environment. The policy provides for a wide range of environmental protection including historic areas and buildings, historic landscapes, parks and gardens, as well as archaeological remains. This will deliver on a number of sustainability objectives relating to protecting and enhancing built and archaeological cultural and historic heritage.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> This policy will provide clear guidance to developers of where the local historic environment is within the County. However, it will be imperative to provide further guidance and information to developers about the different characteristics of these historic environments and what is expected from developments affecting these environments. 															

Policy CTE/3															
Buildings and Structures of Local Importance															
The policy seeks to protect buildings or structures of locally important character and interest and its setting from being significantly adversely affected by development proposals.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	•	•	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Providing protection for non designated historic buildings and structures means that other important historic environments can be retained for future generations to enjoy. This policy will ensure that locally important heritage is considered in planning for new development. However, the policy requires that the buildings and structures are not significantly adversely affected, as opposed to retained and enhanced, which would further maximise the cultural and historic benefits for local communities. This will deliver on a number of sustainability objectives relating to protecting and enhancing built cultural and historic heritage.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • The policy provides a positive approach to stopping any adverse affects on locally important heritage, but could go further in requiring enhancement of local historic features. • The supporting text indicates that the Council are to undertake a local list of such buildings. This will be important guidance for developers to identify which buildings are of local importance to the Council, and to provide further guidance for development relating to each specific individual or set of buildings or structure. 															

Policy CTH/4															
Enabling Development															
The policy provides criteria to enable development that seeks to secure the future of a listed building or building of local importance.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	?	?	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
It is unclear what this policy is attempting to do. Listed buildings and buildings of local importance are already covered more clearly in policies CTH/2 and CTH/3. The purpose and rationale of this policy is quite confusing. Therefore, the policy may not help to deliver on the sustainability objectives set out to conserve and enhance the built and archaeological cultural heritage within the County.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> • This policy should be deleted as it may confuse the reader. It would be clearer if policies CTH/2 and CTH/3 provided all criteria for development that affected either a listed building or building of local importance. It is also important that guidance is provided for applicants relating to the preservation and enhancement of individual or groups of buildings, as described in the recommendations in policies CTH/2 and CTH/3. 															

Policy CTH/5															
Communities and The Welsh Language															
The policy requires a Mitigation Statement, Community Linguistic Statement and/or a language impact assessment from proposals which are likely to have a significant effect on the Welsh language.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	-	?	-	-	-	?	-	-	-	-	-	-	-	?
Sustainability commentary and significant impacts															
The intention of this policy is to help retain local people in the community who speak Welsh. It requests evidence is provided of applicants for proposals which effect the Welsh language within a language statement or language impact assessment.															
This policy does go some way to meet the sustainability objective of protecting and enhancing the cultural heritage of Conwy. However, restricting development due to effects on the Welsh language may have a negative effect on other sustainability objectives, such as restricting new people to an area may restrict encouraging investment and new businesses and jobs into the area.															
The policy does make specific requirements of development itself, in relation to protecting the Welsh Language. It does provide guidance on what types of development would affect the Welsh language. However, the Sustainability Appraisal recognises that it may be difficult to implement this policy and what it may mean in practice. For instance if it will restrict economic or housing growth that would have had benefits for local communities and the economy.															
Furthermore, the supporting text does not provide any further details or guidance on what is expected within a language statement or language impact assessment.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Although it is extremely important to encourage the Welsh language within communities, it is unclear from the policy how development can affect the Welsh language. Therefore there are no recommendations for this policy. 															
Implications of policy revisions															
The Focused Changes version of the LDP includes more detail how the policy will be implemented.															

10 Sustainable transport

Policy STR/1															
Sustainable Transport, Development and Accessibility															
The policy outlines the strategic transport, development accessibility strategy for Conwy, with a mix of criteria for development proposals and also actions for the Council and partners.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
?	-	-	-	-	-	-	-	?	-	-	?	-	-	-	-
Sustainability commentary and significant impacts															
This policy provides a good overview of the Council's intentions relating to transport, development and accessibility. It integrates and highlights various sustainability objectives relating to providing development at transport hubs that have good accessibility by a variety of modes of transport; reducing reliance on car use which will help to reduce green house gas emissions; reduce disparities in access to services.															
The first sentence is clear criteria for development which will help in sustainability terms to reduce the need to travel by car and encourage walking, cycling and public transport.															
The remaining sections of the policy are actions for the Council to undertake to improve accessibility and change travel behaviour. Although the SA does not disagree with these actions and believe they are positive approaches, it is deemed unnecessary to have these criteria within a LDP policy, as they are not criteria against which development proposals will be assessed. These criteria also quote other policies within other LDP policies, therefore repeating criteria which is also unnecessary.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> The policy should be criteria which development proposals are assessed against, and should not repeat other policies in the LDP. The policy text may be better suited to be supporting text introducing the transport section. 															

Policy STR/2															
Parking Standards SPG															
The policy sets out an approach to parking for new development in Conwy, with the aim of reducing impacts on environment caused by parking and car travel.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	-	-	-	-	-	-	-	•	-	-	•	-	-	-	-
Sustainability commentary and significant impacts															
The approach is supported by the SA in helping reduce reliance on car use by controlling parking and providing cycle parking. By restricting car parking this helps to reduce reliance on car use and therefore helps to reduce greenhouse gas emissions.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Further guidance is provided within the Conwy Parking Standards SPG which the Council are reviewing in light of the Regional Transport Plan. This provides the Council with the opportunity to maximise the sustainability objectives within the revised guidance, where possible. 															

Policy STR/3																
Mitigating Travel Impact																
The policy makes a number of different requirements from new development. Firstly it requires development to mitigate any undesirable effect of travel. Secondly, it seeks financial contributions for transport infrastructure and highlights the need to support more sustainable modes of transport. Finally, it requires proposals which will have significant transport implications to submit a Transport Assessment, Travel Plan and Transport Statement.																
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3	
•	-	•	-	•	-	-	-	•	-	•	•	-	-	-	-	
Sustainability commentary and significant impacts																
Mitigating against the effects of travel such as pollution or on the impact on amenity will protect people and the environment from the negative impacts of development. However, it might be more sustainable to require transport developments firstly to not have any effect from noise, pollution, impact on amenity and health, and then secondly mitigate undesirable effects if required. This should promote more sustainable modes of transport before the car.																
Requiring evidence from applicants for development proposals will help to maximise an understanding for the Council, of what the intentions of an applicant will be in relation to providing sustainable travel. However, the Council does not provide any guidance on what is expected within Travel Plans and Transport Statements. In providing more information and guidance on what is expected from development, it may help to improve sustainable transport proposals being developed.																
Financial contributions for more sustainable modes of transport, such as cycling, walking and public transport, will enable people to access services and facilities and reduce negative health and environmental impacts from polluted air and water.																
Recommendations including mitigation:																
<ul style="list-style-type: none"> TAN18 Annex D provide more detail on TAs, but it might be useful if further guidance was provided by the Council on Travel Plans and Transport Statements. This would help to shape development proposals and maximise sustainable transport schemes. 																

Policy STR/4															
Non-Motorised Travel															
This policy promotes cycling and walking by providing a spatial strategy of locating home, work and other facilities at minimal distances. The policy also encourages design layouts to include cycle parking and provide for the users.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	-	•	-	-	-	-	-	•	-	•	•	-	-	-	-
Sustainability commentary and significant impacts															
This policy is positive as it provides for people cycling and walking. The SA supports the approach provided in locating home, work and facilities within close proximity to encourage short distance trips. This reduces the need to travel by car, therefore reducing pollution, reducing impacts of transport on people and the environment and minimising the amount of emissions from cars. However, the policy provides a spatial strategy for the location of different types of development which would be better suited in the strategic policies at the front of the LDP, rather than in a development management policy at the back of the document.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Supporting non-motorised modes of transport is supported by the SA. This policy could be unnecessary as DP/1 (2a) already states the need to provide safe and convenient access for cyclists and pedestrians. The LDP needs to provide all spatial strategy / location of development criteria within the strategic policies at the forefront of the LDP. 															

Policy STR/5															
Integrated sustainable transport system															
This policy sets out where land will be safeguarded for new transport infrastructure															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	?	?	-	-	-	?	?	?	?	-	?	-	?	•	•
Sustainability commentary and significant impacts															
This policy sets out the transport projects to be delivered in Conwy. These include some projects related to public transport and improved walking and cycling, and the sustainability appraisal welcomes the inclusion of these infrastructure improvements in the LDP. Reducing travel by car through improving the attractiveness and safety of alternatives can have a variety of sustainability benefits, including more equitable access, lower carbon emissions, and improved air quality.															
The road improvements can also have sustainability benefits in particular related to economic benefits from quicker travel times. However, it should be noted that increasing road capacity will not be a long-term solution to reducing congestion and new roads encourage car use, and in the end congestion reaches current levels. Increased car use can also have a range of adverse sustainability impacts, including on air quality, health and climate change.															
Although road building is not compatible with the majority of objectives for sustainable development, it is noted that WAG has sought the inclusion of safeguarding land for Llanwrst by-pass. Decision making on the development of this road will be made at a national level and not by the County Borough Council. However, the Council will need to make sure that any strategic road schemes and specific proposals are subject to environmental assessment as appropriate.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It may be suitable to set out in policy which of these schemes would be in part funded from developer contributions The sustainability appraisal would support the delivery of infrastructure to improve public 															

transport access, walking and cycling as a priority to road building

Implications of policy revisions

The Further Changes version of the LDP includes safeguarded land for Llanwrst by-pass.

Policy STR/6

Rail Freight

This is a protection policy to safeguard the existing rail freight facilities at Llandudno Junction and Penmaenmawr.

SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	?	-	-	-	-	-	-	-	-	•	?	?	-	•

Sustainability commentary and significant impacts

Rail is a more sustainable way of moving freight than by lorry, and will be increasingly cost effective with increasing fuel prices. It may also have lower carbon emissions than road travel, especially for mineral transport, helping mitigate against climate change impacts. Therefore, there are likely to be positive sustainability impacts of retaining these sites for rail freight.

Recommendations including mitigation:

- No recommendations

11 Minerals and waste strategy

Policy MSW/1 Minerals and Waste															
The policy provides a list of all the policies that can be found in the minerals and waste section, repeating criteria and quoting the relevant policy numbers.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	?	?	-	?	-	-	-
Sustainability commentary and significant impacts															
Each bullet point in this policy refers to other individual policies in this section and the text repeats elements of each of these policies.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> It is not necessary to repeat policy criteria against which development proposals should be assessed. Therefore it may be better to delete this policy in order to reduce confusion and the amount of policies set out in the final LDP. 															

Policy MSW/2 Minerals															
This policy sets out clearly that no new hard rock quarries or extensions on existing quarries will be given permission in the County Borough, relying instead on the three existing sites at their current size.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	•	?	-	•	•	?	-	-	•	-	?	•	?	?	?
Sustainability commentary and significant impacts															
This is a strong policy that will not permit new or extended quarries. This will have sustainability benefits through reducing the substantial impacts that opencast workings can have on sustainability, including on the landscape, biodiversity and on communities. This approach will also preserve the mineral resource in Conwy.															
However, this approach will limit economic growth in this sector, and also it is likely impacts will be displaced elsewhere in the UK or internationally as controlling supply will not control demand. There could also be the transport impacts of moving this rock if only available sources are not relatively local.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> This policy may need to be reviewed if a hard rock demand if circumstances require it. As borrow pits for outside this policy it may be suitable to state in the policy that it applies to large quarries only, and small sites for a local need may be suitable 															

Policy MSW/3															
Safeguarding rock reserves and sand and gravel resources															
This policy is intended to ensure the existing hard rock and sand and gravel quarries and supporting infrastructure are safeguarded, from inappropriate development and sterilisation.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	•	-	-	?
Sustainability commentary and significant impacts															
Supporting the protection of the buildings and infrastructure on which these quarries depend, including the rail and water freight facilities, is essential to their continued operation.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> No recommendations 															
Implications of policy revisions															
The policy gives more detail on the type of development that may be permitted, adding clarity to the policy and therefore not creating an unnecessary restriction on some types of development.															

Policy MSW/4															
Quarry buffer zones															
This policy shows the buffer zones around existing quarries where no new sensitive development will be permitted															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	?	•	?	-	-	-	-	-	-	-	-	-	-	-	-
Sustainability commentary and significant impacts															
Buffer zones are essential in protecting the amenity of residents and allowing proper operation of the quarry. As the existing quarry, or existing development policies, have allowed development to already be within 200m of the quarry there are bound to be inevitable impact on existing residents. However, besides good operational practices there is very little that can be done to reduce impacts at this time.															
The policy may mean that land that is suitable for housing in accessible locations cannot be developed – although any homes built in these locations would be of poor quality due to amenity impacts.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Enforcement of any existing operational requirements will be essential in maintaining the amenity of existing residents who fall within the 200m buffer, and others. 															

Policy MSW/5															
Sand and gravel safeguarding															
This policy safeguards an area of land around the identified sand and gravel resource south west of Tal-y-Cafn															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	•	?	-	?
Sustainability commentary and significant impacts															
Safeguarding minerals resources is essential for their long-term supply, therefore avoiding dev that would sterilise the resources is essential. This safeguarded site is in the open countryside, therefore it is very unlikely development would occur here anyway, so there will be no impact on the delivery of other development types including housing and employment.															
This part of the County Borough is in the deep rural area and has a high quality natural environment. Clearly any quarry proposed in the area would be subject to rigorous testing of need prior to permission be granted, although there would be an inevitable impact. However, as no quarry is proposed, and may never be, this cannot be a consideration of the sustainability appraisal.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> No recommendations 															

Policy MWS/6 and MWS/8															
Proposals for Waste Management, and Use of Industrial Land for Waste Management Facilities															
The policy provides criteria for permitting the development of waste management sites, including development to existing facilities.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	•	-	-	-
Sustainability commentary and significant impacts															
The policy specifies that any future waste management proposal should meet an identified need for North Wales or the local area, and that the development will only be permitted where it can not be met elsewhere. Although there are two locations for waste management facilities identified in MWS/7, this does not provide the right locations for all the waste management facility needs of Conwy in the plan period and potentially beyond. In not identifying specific sites for the type of required needs within the LDP it may impact on the short term delivery of sites, and may have implications for sustainable waste management in the immediate future.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> Although there are two locations for waste management facilities identified in MWS/7, it would be better in the short term to be able to allocate all sites to cater for all needed waste management facilities. In the short term this could reduce how far waste potentially has to travel, by securing land for all local and regional needs of waste management facilities. MWS/8 repeats the policy criteria of MWS/6. Therefore MWS/8 should be deleted from the LDP. 															

Policy MSW/7																
Locations for waste management																
This policy sets out two locations for waste management facilities and the types of facility that may be suitable in these locations.																
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3	
-	-	?	-	?	?	?	?	?	-	?	?	•	-	-	-	
Sustainability commentary and significant impacts																
<p>Providing new facilities for the more sustainable management of waste can help reduce the waste of primary resources by making better use of waste. The two sites proposed for waste management are in locations to the east of the County Borough, and should be able to accommodate new waste facilities. It may have helped delivery if the type of facilities required were identified, rather than listing all possible types. In addition it should be made clear that additional landfill will not be permitted prior to delivery of more sustainable management options.</p> <p>Clearly the delivery of these sites may have some impact on the natural environment, although this should be controlled through appropriate national and local development plan policy, as well as licensing arrangements. Any planning permissions will need to include conditions on operation and management of the site to avoid adverse environmental and social sustainability impacts.</p>																
Recommendations including mitigation:																
<ul style="list-style-type: none"> • This policy could be combined with others in this section, in particular MWS/9 that includes the same sites. • Policies on environment, amenity, and health protection will be necessary to control the impacts of new waste management facilities • Part of planning permissions for facilities of this type will need to include conditions on operation to reduce the operational impact on people and the environment 																

Policy MSW/9																
Safeguarding existing waste facilities																
This policy seeks to make sure that land already in use for waste management remains in this use.																
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3	
-	-	-	-	-	-	-	-	-	-	-	?	?	-	-	-	
Sustainability commentary and significant impacts																
<p>Providing facilities for the more sustainable management of waste can help reduce the waste of primary resources by making better use of waste. Protecting these sites should help to retain these facilities that provide for some of the local waste management needs in Conwy.</p>																
Recommendations including mitigation:																
<ul style="list-style-type: none"> • This policy could be combined with others in this section, in particular MWS/7 																

Policy MWS/10															
Landfill buffer zone															
The policy prevents development in the landfill buffer zone, in order to protect public safety.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	•	-	-	-	-	-	-	?	-	-	-	-	-	?
Sustainability commentary and significant impacts															
This policy will protect the operation of landfill sites and protect residents of future development from the risks of migrating landfill gas.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> None 															
Implications of policy revisions															
This is a new policy and should help protect public safety.															

Policy MWS/11															
Construction or Demolition Waste															
The policy requires a developer to submit a method statement if a proposal involves demolition or disposal of surplus material. The method statement is to demonstrate how the developer will maximise the re-use of material.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
-	-	-	-	-	-	-	-	-	-	-	-	•	-	-	-
Sustainability commentary and significant impacts															
The SA supports the re-use of material and this policy meets a key sustainability objective which is to encourage better building practices that reduce construction waste and ensure demolition waste is reused in development. Reusing construction waste will reduce waste, particularly to landfill.															
Although a positive approach to dealing with waste, this policy could be worded better, as currently the policy requires the developer to submit a method statement, rather than required the development proposal to maximise the re-use of materials.															
Recommendations including mitigation:															
<ul style="list-style-type: none"> The policy should be reworded slightly to require development proposals to maximise the re-use of materials from the site. A method statement should be submitted to provide evidence that the policy criteria has been met. It would be helpful to the applicant to have guidelines on the type of things expected from the method statement. 															

Appendix 2

Summary of Recommendations and
Conwy County Borough Council Response

Summary of Recommendations and Conwy County Borough Council Response

The Council commissioned Baker Associates to undertake a Sustainability Appraisal (SA) of the Deposit Local Development Plan (LDP). As a result, Baker Associates produced a Part Three report entitled 'Revised Sustainability Report of the Conwy revised Deposit LDP'. This followed the initial report entitled 'Sustainability Appraisal of the Options Report and Preferred Strategy for the Conwy LDP' and subsequent report on the initial deposit plan. In preparation of the submission documentation and in preparing focused changes to the Plan, Baker Associates were further commissioned to undertake an SA of the Council's proposed Focussed Changes. The recommendations set out in the revised Appendix 1 to the SA, as recommended by Baker Associates, have also been responded to by Council. Where the recommendation has resulted in a change to reflect a more sustainable Plan, this is reflected and detailed in this revised submission SA to the focused changes. Table 1 below details the recommendations set out in the revised Sustainability Report on the focused changes to the Deposit LDP (2011) and an Officer response.

Further sustainability appraisal work has also been progressed by the Council in preparing the focused changes as detailed in BP/2 'Population and Household Projections', BP/21 'Site Deliverability Assessment' and BP/37 'Growth Distributions Options Report'.

The purpose of the SA is to inform the decision making process during the preparation of the LDP in order to ensure that the potential sustainable development implications of the LDP strategy are identified and recognised in the choices made by the Council. It will therefore be used in order to ascertain whether the LDP incorporates good practice and is sound in sustainability terms.

The SA of the focussed changes revised Deposit LDP has been an on-going process alongside the preparation of the focussed changes to the Plan. The SA concludes a number of recommendations in that would need to be addressed in order for the LDP to reflect sustainable outcomes more effectively. This officer responses set out in the table below summarise the main recommendations of the SA as recommended and indicates the steps that Planning Officers have/or will take to remedy the issues raised. Additionally, further commentary is provided to relevant sections and paragraphs set out in the SA where felt necessary. It is only where suggested recommendations are made that are responded to.

Focussed Changes: Conclusions, recommendations and Planning Policy Officer Responses

Table 1: Focussed Changes: Conclusions, recommendations and Planning Policy Officer Responses

SUMMARY OF RECOMMENDATIONS TO THE FOCUSED CHNAGES	RESPONSE AND REMEDIATION STEPS TAKEN
<p>Recommendation 1: Sustainable Development Principles</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p> <p>The submission LDP has been prepared using the most up to date and revised evidence base. The allocation of sites to meet needs has been prepared in line with sustainable criteria. The distribution of development within the Plan Area focuses on the more accessible urban locations which also benefit from the key facilities and services and employment. In preparation of the submission material and in taking account of the representations received to the Plan, greater detail has been produced to evidence the level and distribution of growth throughout the County Borough.</p>
<p>Recommendation 2: Promoting Design Quality and Reducing Crime</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 3: Development Criteria</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 4: Infrastructure and New Development</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>

<p>Recommendation 5: Local Planning Guidance</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 6: Masterplans and community appraisals</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 7: Colwyn Bay Masterplan</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision</p>
<p>Recommendation 8: Meeting housing needs</p> <p>The Council will need to be confident that the identified housing requirement does meet the need of the County Borough. It is notable that in some areas the quantity of housing has changed significantly between plan making stages, such as Llanfairfechan where the allocation is down from 245 to 40 homes.</p> <p>The repeated revision of housing allocations should help make sure those that are allocated are actually deliverable. However, the Council will need to be confident they have the information to back-up the allocation of all these sites and yields identified are reasonable. This should include the sustainability assessment of all sites and their alternatives to demonstrate these sites will help deliver sustainable development.</p>	<p>The Council has prepared further submission evidence base to support the focussed changes made. The Alternative Sites submitted to the Site Allocations Representations consultation has resulted in site changes where the site has been deemed more sustainable (e.g. brownfield) and where located in more sustainable locations. The impact of reduced growth and a review of the distribution of growth against the strategy has resulted in some sustainable focussed changes to the Plan.</p> <p>BP/35 provides justification for the site focussed changes and BP/37 provides the necessary evidence to support the distribution for growth.</p> <p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision</p>
<p>Recommendation 9: Affordable housing for local need</p>	<p>Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>

<p>Recommendation 10: Phasing Housing Development</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>
<p>Recommendation 11: Housing Density</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms</p>
<p>Recommendation 12: Housing Mix</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms</p>
<p>Recommendation 13: Rural Exception Sites for Affordable Housing for Local Need</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms</p>
<p>Recommendation 14: Register of Land Holdings</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms</p>
<p>Recommendation 15: Meeting the site need for Gypsies and Travellers</p> <p>Following completion of the local needs assessment it may be suitable to review the policy and allocate sites. This will need to take into account the differing needs of</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>

<p>individual Gypsy and Traveller communities and the type and scale of site that may be needed.</p> <p>Criteria (h) needs to be carefully applied so as to avoid unwarranted hostile objection to legitimate and suitable pitch sites.</p>	<p>The Council has prepared a revised Background Paper 22 to the changes proposed.</p>
<p>Recommendation 16: Houses in Multiple Occupation and Self Contained Flats</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>
<p>Recommendation 17: Residential care homes and extra care housing</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>
<p>Recommendation 18: Re-use and Adaptation of Redundant Rural Buildings for Residential Use</p> <p>A single policy on re-use and adaptation on redundant rural buildings could create a more succinct plan, covering all types of use including housing and employment.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>
<p>Recommendation 19: Meeting B1, B2 & B8 office and industrial employment needs</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms.</p>
<p>Recommendation 20: Allocation of new B1, B2 and B8 office and industrial employment sites</p> <p>Parts of the policy relating to the over employment requirements relating to population growth and reducing out-commuting levels is repeating criteria already set out in policy EMP/1.</p>	<p>Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms. The commentary does not impact on the sustainability of the Plan.</p>

<p>Recommendation 21: New B1, B2 & B8 Office and Industrial Development on Non-Allocated Sites</p> <p>Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction</p>	<p>Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms. The commentary does not impact on the sustainability of the Plan.</p>
<p>Recommendation 22: Safeguarding B1, B2 & B8 Office and Industrial Sites</p> <p>The policy has been amended by Focused Changes to include more information on the detail that an applicant would have to provide to achieve a change of use from employment. This should be beneficial in protecting the employment land bank.</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms. The commentary does not impact on the sustainability of the Plan.</p>
<p>Recommendation 23: Office and Industrial Employment Improvement Areas</p> <p>Improving employment land and premises is important in retaining jobs in the County and providing for sustainable communities, and this policy is important in ensuring employment land is retained and improved.</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms. The commentary does not impact on the sustainability of the Plan.</p>
<p>Recommendation 24: Re-use and Adaptation of Redundant Rural Buildings</p> <p>A single policy on re-use and adaptation on redundant rural buildings could create a more succinct plan, covering all types of use including housing and employment.</p>	<p>Noted and Agreed. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. The suggested amendments are not related to improving the Plan in sustainable terms. The commentary does not impact on the sustainability of the Plan.</p>
<p>Recommendation 25: Tourism & Location of New Tourism Development</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the</p>

	implications of the Policy revision.
<p>Recommendation 26: Safeguarding of Community Facilities Outside Llandudno, Colwyn Bay and District Centres</p> <p>The policy in the Focused Changes version includes all types of facilities that should be protected, previously it was only shops. This is positive change in meeting sustainability objectives relating to community and wellbeing.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 27: New Allotments</p> <p>All five of the allotments allocated in the Further Changes LDP are new, replace four previous allocations. The towns/villages in which allotment allocations are made has also changed, for instance no allocation in Rhos on Sea and new allocation in Abergele. It is therefore not clear if allotments are allocated to meet identified demand or just in available locations.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision. Justification is provided in BP/25.</p>
<p>Recommendation 28: Development and Open Space</p> <p>The overall requirement for open space has been reduced from levels in the 2011 Deposit LDP. This may reduce the quantity of open space that is delivered to meet the community's needs. However, the new requirement is in line with national standards and should be more financially viable (and therefore deliverable) than then earlier version.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 29: New open space allocations</p> <p>The Focused Changes removed one allocated site, which could have implications for delivery of sufficient open space to meet the needs of community's. The Council will need to identify an additional space for allocation.</p>	<p>Agreed and Noted. The site was lost as a result of flooding. No alternative lands have come available to meet the needs.</p>

<p>Recommendation 30: New burial ground</p> <p>An additional allocation was added in Focused Changes 2012. It should be ensured that allocations are made to make the best use of land.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 31: Special Landscape Areas</p> <p>Basing the landscape protection areas on work done nationally as part of Landmap should help protection those areas highest quality within Conwy County Borough.</p> <p>The policy mainly relates to the measures that development that development proposed in Special Landscape Area will have to comply with. This includes requirements for landscape character assessments in 'appropriate cases'. However, the plan is not clear when this will be required and how 'appropriate cases' will be determined. Furthermore, the policy gives little detail on how landscape character should be protected outside the Special Landscape Areas, with the exception of a statement that proposals must be considered against other policies.</p> <p>Reference to other policies is unnecessary as all development proposals would have to take into account all relevant policies of the plan.</p>	<p>Agreed and Noted. New remediation steps are required to reference other policies and ensure sustainability and protection. This is proposed as part of the focussed changes to the Deposit Plan.</p>
<p>Recommendation 32: Energy Efficiency and Renewable Technologies in New Development</p> <p>This policy provides introductory text to other policies in the LDP and therefore no extra mitigation measures are provided by the Sustainability Appraisal.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>

<p>Recommendation 33: Onshore wind turbine development</p> <p>The policy was revised for accuracy when updated to the Focused Changes version.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 34: Communities and the Welsh Language</p> <p>The Focused Changes version of the LDP includes more detail how the policy will be implemented.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 35: Integrated sustainable transport system</p> <p>The Further Changes version of the LDP includes safeguarded land for Llanwrst by-pass. Although road building is not compatible with the majority of objectives for sustainable development, it is noted that WAG has sought the inclusion of safeguarding land for Llanwrst by-pass. Decision making on the development of this road will be made at a national level and not by the County Borough Council. However, the Council will need to make sure that any strategic road schemes and specific proposals are subject to environmental assessment as appropriate</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>
<p>Recommendation 36: Safeguarding rock reserves and sand and gravel resources</p> <p>The policy gives more detail on the type of development that may be permitted, adding clarity to the policy and therefore not creating an unnecessary restriction on some types of development.</p>	<p>Agreed and Noted. No new recommendations are proposed from the SA to the Deposit LDP. No remediation steps are required from the recommendations or the response to the implications of the Policy revision.</p>

Appendix 3

Overview appraisal of the proposed LDP objectives against the sustainability objectives developed for the sustainability appraisal

This Appendix considers the sustainability implications of the proposed LDP objectives, in order to ensure the matters covered are consistent with the objectives for more sustainable development. The matrix based approach provides a useful visual overview of the compatibility of the two sets of objectives, allowing for the identification of potential areas of conflict and omissions in the LDP objectives. This appraisal method is intended to be quite simplistic in its approach, and therefore the appraisal primarily considers if the objectives are compatible based on direct impacts.

	Access to service	Community / culture	Health / wellbeing	Housing	Biodiversity	Landscape	Built environment	Cultural heritage	Energy	Land	Water	Air	Minerals and waste	Economic diversification	Employment access	Encouraging investment
SO1: Broad locations of growth	●	?	?	?	●	●	?	-	-	●	-	?	-	-	●	?
This objective covers many aspects of sustainable development and the proposed strategy for development in Conwy. There is a clear intention to help protect the natural and built environment, and ensure the efficient use of land by locating development on previously developed land and providing development at the densities necessary use land efficiently. Access may also be improved by locating new development in places where there are already a good level of services and connections. Overall, this is a positive objective for sustainable development, although the objective is currently quite wide-ranging and does overlap with others.																
SO2: Regeneration of Colwyn Bay, Abergele, Towyn and Kinmel Bay	●	●	●	?	-	-	●	?	-	-	-	-	-	●	●	●
This objective relates to delivering regeneration in the towns and villages identified as being in need of revitalisation and renewal. This could have a variety of sustainability benefits. This includes, social benefits to residents, such as better access to facilities and quality homes, and also promoting these areas for investment with potential benefits for the economy.																
SO3: Meeting housing needs	●	●	●	●	?	?	?	?	-	-	-	-	-	-	?	?
This objective addresses the need to provide new homes in the County Borough to meet the needs of the population, including affordable homes and gypsies and traveller sites. This should help not only to meet sustainability objectives relating to housing, but also help improve wellbeing and community character. In addition, providing homes for a varied workforce can help retain and encourage business investment in the area. As with any large scale development growth there is the potential for adverse impacts on protection of the natural environment.																
SO4: Meeting employment needs	-	?	-	-	?	?	?	?	-	-	-	-	-	?	●	●
This objective specifically deals with employment related development, specifying the main locations for large scale new employment development																

	Access to service	Community / culture	Health / wellbeing	Housing	Biodiversity	Landscape	Built environment	Cultural heritage	Energy	Land	Water	Air	Minerals and waste	Economic diversification	Employment access	Encouraging investment
in Conwy. This includes the contribution of development in Kinmel Bay to cross-border employment areas. There are potential benefits for residents of the area through better access to employment, and provision of suitable site may also help encourage more diverse economic investment in the area. As with any large scale development growth there is the potential for adverse impacts on protection of the natural environment.																
SO5: Rural economy	?	?	-	-	?	?	-	?	-	-	-	?	-	●	●	?
This objective seeks to strengthen the rural economy, this could have positive benefits for the residents of the rural area, through access to jobs. However, impacts will depend on the location and scale of this development, with the potential for landscape and natural environment protection. However development of this type could lead to unsustainable travel patterns, with air quality impacts, if businesses were of a scale that needed a large workforce, who many not necessary be living locally.																
SO6: Towns centres, Llandudno and Colwyn Bay	●	●	●	-	-	-	●	●	-	-	-	●	-	?	?	●
Improving the town centres in the towns of Conwy can help to improve the image of the area and provide new accessible services to local people. Focus of retail and other uses in these areas can also help reduce the number of trips people need to make to meet their day-to-day needs. Town centre development is also more likely to be accessible by various modes of transport, including bus, train and walking. Therefore, development in these locations could help reduce car use and not put people who do not travel by car at a disadvantage. Physical regeneration can bring benefits to the built environmental and heritage of town centres.																
SO7: Development on infrastructure networks	?	?	-	-	-	?	-	-	-	-	-	?	-	-	-	-
This objective would see more development along infrastructure networks, repeating objective SO1. This could have some advantages in terms of access. However, it is vital to ensure that these were infrastructure routes that supported non-car modes of travel. If not, this approach could lead to 'ribbon-development' that was largely reliant on car use, with the potential for essential services to be located some distance away. It may be necessary to increase the emphasis of the objective for non-car travel by 'prioritising' pedestrian, cyclist and bus travel, rather than only seeking it to be 'convenient'. Similarly it may be better to emphasis new development at transport nodes rather than along routes. 'Ribbon-development' also has a greater potential for adverse landscape impacts than more compact forms of development.																

	Access to service	Community / culture	Health / wellbeing	Housing	Biodiversity	Landscape	Built environment	Cultural heritage	Energy	Land	Water	Air	Minerals and waste	Economic diversification	Employment access	Encouraging investment
SO8: Assist tourism	?	-	-	-	?	?	?	?	-	-	-	-	-	?	-	●
This objective is to assist tourism, an important component of the Conwy economy. As with any type of development there is the risk of harm to the natural and built environment quality if inappropriately designed and sited. Attractions that would encourage a high number of visitors should be located in areas with good public transport access to avoid encouraging car use.																
SO9: Movement	?	-	-	-	-	-	-	-	-	-	-	?	-	-	-	●
There a key east west movement routes in Conwy along the coast, as well as routes that link the rural hinterland to the coastal towns, this objective seeks to make use of these. However, as with objective SO7 there should be an emphasis on prioritising public transport, walking and cycling access in all development – rather than ensuring it is ‘convenient’. The high quality road links will also be beneficial in encouraging inward economic investment in Conwy, particularly along the coast.																
SO10: Design	-	●	-	-	-	-	●	●	-	-	-	-	-	-	-	?
Encouraging good quality design can have benefits for the quality of the built environment and for cultural heritage. It can also help improve the image of the area for inward investment. The objective could emphasise the value of the design in creating accessible neighbourhoods that reduce the need to travel by car are of a human scale that prioritise people travelling by foot. This would be in addition to using design to help reduce opportunities for crime and fear of crime. The objective is also to create places to encourage younger people to stay in the area. This is a positive objectives as making places attractive to young people and families can have positive impacts on the demographic mix and future viability of communities.																
SO11: Energy efficiency and renewables	-	-	-	-	?	?	-	-	●	-	-	?	?	-	-	?
Reducing energy use from non-renewable resources is essential in helping to mitigate against climate change, and future proof development against the medium/long-term inevitable rise in fuel price. The policy should identify the important of small scale renewable schemes and development site specific, in addition to those that would serve a larger role in Wales’ contribution to renewable energy generation targets. It should be made sure that the wording of the objective is not such that it dissuades renewable energy technology implementation for a global good, at the expense of very local concerns.																

	Access to service	Community / culture	Health / wellbeing	Housing	Biodiversity	Landscape	Built environment	Cultural heritage	Energy	Land	Water	Air	Minerals and waste	Economic diversification	Employment access	Encouraging investment
SO12: Protect the coast and countryside	-	-	?	-	●	●	?	●	-	-	-	-	-	-	-	?
This objective seeks the continued protection and enhancement where necessary of the coast and countryside of Conwy. The quality of the undeveloped parts of the Country Borough make a significant contribution to the economy in terms of tourism and attracting other business to relocate to north Wales.																
SO13: Access to services	●	●	●	-	-	-	-	-	-	-	-	?	-	-	-	-
This objective could have a variety of social sustainability benefits, including helping people's health, wellbeing and strengthening communities. There could also be environmental sustainability benefits from helping reduce car travel by allowing people to meet their needs near their homes – preferably within walking distance.																
SO14: Minimising waste	-	-	?	-	-	-	-	-	●	?	-	?	●	-	-	?
Reducing waste to landfill can have a significant benefit for sustainable development, this includes making better use of primary resources and help reduce energy use, land take, and methane emissions that contribute to climate change. New sites will have to be located to avoid impacts on amenity, the natural environment, and to reduce the distance waste travels from source to disposal.																
SO15: Minerals	-	?	?	-	?	?	?	?	-	?	?	?	?	-	-	?
In meeting this objective there is the potential for impacts on the natural environment, including landscape, biodiversity and residential amenity. The extent of these impacts will depend on the need for new mineral workings in the County and the locations in which mineral resources are found.																
SO16: The Welsh language	-	●	-	-	-	-	-	●	-	-	-	-	-	?	?	?
This objective is to protect the Welsh language in the County Borough. Seeking to support the balance of English and Welsh speaking in the communities of the plan area. Welsh speaking is an intrinsic part of the culture in the area, particularly rural communities. Developing of a type and scale that respects the local culture will be important, although meeting this objective should not be at the expense of securing a viable rural economy.																

Appendix 4

Monitoring framework for the sustainable appraisal

Concern	Sustainability objective	examples of LDP influence on meeting SA objective
Social progress which recognises the needs of everyone		
Access to services	<ul style="list-style-type: none"> • Ensure access for all to facilities, goods and services in order to combat social exclusion and deprivation 	<ul style="list-style-type: none"> • % of A1 units in Primary Shopping Areas • Loss of community facilities outside Llandudno and town centres. • Development approved contrary to Officer or statutory consultee recommendation which has a negative impact on accessibility to essential services and facilities, including open space, allotments, health, education and leisure. • Percentage of vacant units within the primary shopping areas and shopping zones. • Number of applications for new non-bulky retail floor space outside of centres defined in the retail hierarchy. • Loss of community facilities outside Llandudno and town centres. • Amount of major retail, office and indoor leisure development (m²) permitted in town centres as a % of all major development permitted within the Plan Area.
Community and culture	<ul style="list-style-type: none"> • Maintain and enhance community cohesion and identity 	<ul style="list-style-type: none"> • % of housing development take up in the Urban and Rural Development Strategy Areas in meeting predicted population change requirements • Applications approved for new areas of open space in locations across the plan area • Applications submitted with Community and Linguistic Statements and Community and Linguistic Impact Assessments in line with Policy thresholds in CTH/5. • f% of population who live in the Lower Super Output Areas (LSOAs) that rank amongst the 100 most deprived LSOAs in Wales. • Loss of community facilities outside Llandudno and town centres.
Health and well-being	<ul style="list-style-type: none"> • Provide a clean, healthy and safe environment for all 	<ul style="list-style-type: none"> • Net loss of land for allotments • Number of applications approved for new allotments on allocated sites and other suitable sites where a need exists and which accord with development principles. • Number of developments for 30 or more dwellings which provide on site provision for open space in line with Policy CFS/11 and LDP4 'Planning Obligations'. • Number of developments of less than 30 dwellings which make provision for a commuted sum for open space in line with Policy CFS/11 and LDP4 'Planning Obligations' • Net loss of open space

		<ul style="list-style-type: none"> • Applications approved for new areas of open space in locations across the plan area.
Housing	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs 	<ul style="list-style-type: none"> • Number of net additional affordable and general market dwellings built per annum. • 5 year housing land supply • The number of housing schemes developing housing types and sizes against the evidence set out in the Local Market Assessment and/or Social/Affordable Housing Registers • Number of vacant dwellings brought back into use • Amount of affordable housing permitted via 'exception sites'.
Effective Protection of the Environment		
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area 	<ul style="list-style-type: none"> • Permissions granted for development which is considered to have a negative impact on an LBAP (full list) species/habitats. • Development adversely affecting a RIG granted permission against Officer or local archaeological organisation recommendations. • Applications granted permission which result in the loss of land within an SPA, SAC or SSSI • Applications granted permission against Officer or CCW advice considered to have potential to cause harm to a protected site or species • Any negative effect highlighted by a statutory body relating to a degradation of a water body within a European site as a result of Conwy LDP promoted development. • Any negative effect caused in a neighbouring authority area brought to the attention of a statutory body thought to be caused by a development or Policy in the Conwy LDP.
Landscape character	<ul style="list-style-type: none"> • Ensure special and distinctive, semi-natural and historic landscapes and their specific features are conserved and enhanced 	<ul style="list-style-type: none"> • Applications granted permission against Officer recommendations where a detrimental impact on an SLA had been identified.
Built environment	<ul style="list-style-type: none"> • Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards 	<ul style="list-style-type: none"> • Number of planning applications approved not in accordance with the relevant SPG (i.e. Design SPG) or Planning Brief • Number of relevant applications granted resulting in the shop front having a negative impact on the area.

Cultural heritage	<ul style="list-style-type: none"> • Conserve and enhance the built and archaeological cultural heritage features of the area 	<ul style="list-style-type: none"> • The number of applications granted that adversely affect known archaeological sites and unregistered sites of archaeological importance. • Appeals won by LPA following refusals under Policy CTH/3 relating to development adversely affecting buildings and structures of local importance. • The number of applications granted that adversely affect known archaeological sites and unregistered sites of archaeological importance • Number of listed buildings or structures demolished • Applications for development which affects buildings or structures of local importance granted against the recommendations of the Conservation Officer
Prudent use of natural resources		
Energy	<ul style="list-style-type: none"> • Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from renewable resources 	<ul style="list-style-type: none"> • Onshore wind turbine development within SSA achieving below 5MW • Onshore wind turbine development within SSA • Onshore wind turbine development greater than 5MW approved outside SSA. • BREEAM levels for new build employment not being met. • CFSH levels for new build dwellings not being met. • The capacity of Renewable Energy developments (MW) installed inside Strategic Search Areas by type (TAN8).
Land	<ul style="list-style-type: none"> • Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant 	<ul style="list-style-type: none"> • Amount of new development (ha) permitted via conversions and brownfield redevelopment as a % of all development permitted • Development greater than 0.5 ha on Grade 2 and 3a agricultural land which does not comprise an LDP allocation. • Amount of greenfield and open space lost to development (ha) which is not allocated in the LDP or in accord with LDP Policy. • Average density of housing development permitted on allocated development plan sites.
Water	<ul style="list-style-type: none"> • Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to 	<ul style="list-style-type: none"> • Applications granted permission against Officer or advice of the SAB to incorporate SUDS or adequate drainage provision. • Applications granted permission against office or statutory consultee advice to incorporate water conservation methods • New development of 1,000 m² or 10 dwellings not submitting a Water Conservation Strategy. • Development permitted in C1 and C2 floodplain areas not meeting all TAN15 tests or

	increase the risk of flooding or the risk from flooding	EAW recommendations.
Air and Atmosphere	<ul style="list-style-type: none"> Reduce all forms of air pollution locally and globally improve the atmosphere 	<ul style="list-style-type: none"> Approval of planning permission which does not conform to LDP2: Parking Standards SPG Development approved without a Transport Assessment, Travel Plan or Road Safety Audit contrary to officer or statutory consultee recommendation
Minerals and primary resources	<ul style="list-style-type: none"> Safeguard non-renewable resources and promote reuse of primary resources 	<ul style="list-style-type: none"> Number of planning permissions granted for extraction of aggregate mineral not in line with policy MWS/2 Number of planning permissions granted in the safeguarding hard rock and sand and gravel designations not in line with Policy MWS/3. Rates for recycling, preparation for re-use and composting compared with national targets (Wales Waste Measure 2010). Amount of waste management capacity developed in the Plan area, or outside of the Plan area to deal with waste arising in Conwy
Maintenance of high and stable levels of economic growth and employment		
Economic diversification	<ul style="list-style-type: none"> Encourage diversification of the economic base in rural and urban areas 	<ul style="list-style-type: none"> Level of serviced accommodation within Holiday Accommodation Zone (HAZ).
Employment access	<ul style="list-style-type: none"> Ensure that there is good access for all to employment 	<ul style="list-style-type: none"> Annual unemployment level Number of County residents in employment Number of residents out-commuting to work to locations outside the County Borough % of employment land take up in the Urban and Rural Development Strategy Areas in meeting predicted population change requirements. Employment land development per annum in the Rural Development Strategy Area
Encouraging investment	<ul style="list-style-type: none"> Emphasise and increase factors conducive to wealth creation and attractiveness to investors 	<ul style="list-style-type: none"> Employment land development per annum in the Urban Development Strategy Area.