

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



BACKGROUND PAPER 3 Growth Level Options Report

March 2011

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**CONWY COUNTY BOROUGH
COUNCIL**

**Review of 2006
Population and Household
Trends**

Final Report



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1 Introduction

1.1 Background

1.1.1 This study has been prepared by Baker Associates for Conwy County Borough Council. The work has been required in order to provide a critical part of the evidence base for a sound Local Development Plan (LDP) for Conwy County Borough, and specifically following the criticism by WAG of the Council's current position on its housing provision target in relation to other matters to be addressed by the plan.

1.1.2 The Brief for the work required that a review be undertaken of the 2006 based Population and Household Projections. This has been done, but this is only part of the work necessary to meet the Council's objective of arriving at a plan which will be found sound by a Planning Inspector when it is submitted for an Independent Examination. The review is necessarily a fairly dry statistical exercise and one that can only go so far in meeting the Council's objectives. We have also been very aware that a good plan for the County Borough is one that tackles the issues faced by the County Borough and does so in an integrated fashion. This point is central to the criticism made by WAG. It is also part of the test of soundness that the Planning Inspector will apply at the Independent Examination, along with matters relating to the process by which the LDP has been produced.

1.1.3 The study is concerned with the LDP and the LDP is the Council's plan. We have sought therefore to engage with the elected members who ultimately must decide on what they want to see in the plan, how all of its parts fit together, and whether it can be adopted following the Planning Inspector's report. A vital component of the method by which the work has been carried out and this report produced has been the use of two progressive member workshops, facilitated by the consultants and observed by the Council's officers.

1.2 Report

1.2.1 The report is arranged as follows. Section 2 describes the **Methodology**.

Thereafter the sections of the report are organised according to the specific objectives of the study as set out by the Council.

1.2.2 Section 3 **Review of Existing Evidence** will:

- Review adopted and emerging national and regional policy guidance with regards to the production of LDPs and the implementation of Population and Household Projections;
- Review the comments from the Welsh Assembly Government (WAG);
- Undertake analysis of alternative data sources to establish whether such information is available and determine whether the applied data provides a more 'sound' evidence base on migration flows and household change in Conwy;
- Review previous challenges by Local Planning Authorities in the UK to the Population and Household Projections.

1.2.3 Section 4, **Analysis of Policy Implications** will assess the potential policy variation related to Council priorities to identify the likely impact on population and household growth over the LDP period (2007 – 2022) having regard to proposals and policies towards:

- supporting communities
- economic growth
- housing (including affordable housing)
- environmental protection

1.2.4 Section 5, **Making a Plan** seeks to bring the findings of the previous sections together with conclusions and recommendations, presented in terms of what the Council might do in order to present a good and sound LDP.

2 Methodology

2.1 Introduction

2.1.1 The requirement for the work identified in the Brief arises from the need for a housing provision figure to be agreed for inclusion in the Conwy LDP, after objection to the previously used figure by WAG as being too low to satisfactorily address important priorities and policy requirements in the County Borough. The work to produce a housing figure has to be technically robust. This is only part of the exercise however, and the process of establishing a figure also has to stand scrutiny and meet all of the requirements for the preparation of material to be included in an LDP which will be both sound and good.

2.1.2 The essence of the approach is to come at the issue from three different positions and to derive a number that provides the best 'fit' with each approach, as well as giving a clear rationale for the range of figures that might be used in providing the flexibility required of a plan as part of the soundness test.

2.1.3 The three different approaches that are integrated to provide the recommended housing figure and range, together with justification for the choice, are:

- A projection based approach – meaning the numerical consequences of accepting the likely trends in birth and death rates and particularly in net migration levels, and applying trends in household formation to these
- A delivery based approach – looking at what the capacity of the area to provide housing might be in environmental terms, and qualifying this with what has been achieved in completions by the housing industry
- A purpose based approach – looking at the reasons for making provision for housing in relation to the maintenance of communities, access to housing and support for economic development.

2.1.4 We believe that in order to proceed with confidence with an adopted housing provision figure for the LDP, the Council needs to have good evidence and it needs to be able to demonstrate a fully integrated approach to the important issues facing the Borough. To ensure that this relationship with the LDP is integral

to the work and fully understood by decision-takers we proposed from the outset that the Council members become part of the project.

- 2.1.5 Two member workshops were part of the work. These were used to explore the nature of the study and some of the demographic information. The meetings were used to explore what the main concerns of the members were for their wards and communities, and to consider the links between these matters and housing provision. A summary of workshop 2 is provided in Appendix 3.

3 Review of Existing Evidence

3.1 Introduction

- 3.1.1 Section 3 is concerned with the review of existing evidence. The objective of this stage is to examine the 2006 based population and household projections, and identify whether there are robust alternative sources of trend data available and a basis for a different housing provision figure to be used in the LDP. Late in the process, 2008 projection have become available and these have been considered alongside the 2006 projections as an alternative data source.
- 3.1.2 In addition section 3 seeks to set the context for the study by reviewing the national policy context and the tests of soundness, and by examining the Welsh Assembly Government (WAG) objection to identify the key concerns and how they relate to tasks identified as part of the study.
- 3.1.3 Section 3 specifically addresses the following tasks from the Council's brief for the study:
- Review adopted and emerging national and regional policy guidance with regards to the production of Local Development Plans (LDPs) and the implementation of Population and Household Projections
 - Review the comments from the Welsh Assembly Government (WAG) and establish whether the approach taken in the Deposit LDP (6300 Dwellings) is/or can be supported by evidence base and whether it is an approach that tackles the priority issues

- Undertake analysis of alternative data sources to establish whether such information is available and determine whether the applied data provides a more 'sound' evidence base on migration flows and household change in Conwy and its impacts on the growth required. Particular attention should be paid to the robustness of the statistical methods underlying alternative estimates
- Review previous challenges by Local Planning Authorities in the UK to the Population and Household Projections.

3.2 National and regional policy

3.2.1 Current land use planning policy is contained in 'Planning Policy Wales' (March 2002) which provides the strategic policy framework for the effective preparation of local planning authority development plans. This is supplemented by 20 topic based Technical Advice Notes (Wales) (TANs). Procedural guidance is given in Welsh Office / National Assembly for Wales Circulars.

3.2.2 Since Planning Policy Wales was produced, any changes or additions to policy which are agreed before a revised version of Planning Policy Wales is issued are notified by Ministerial statement and subsequently published as numbered Interim Planning Statements. Those published to date include:

- Ministerial Interim Planning Policy Statement (MIPPS) 01/2006 (Housing) is relevant to this study. This Ministerial Interim Planning Policy Statement provides a revised Chapter 9 of 'Planning Policy Wales' (2002). The MIPPS states in para 9.2.2 'The latest Assembly Government National and Sub-National Household Projections for Wales should form the starting point for assessing housing requirements'.
- Ministerial Interim Planning Policy Statement (MIPPS) on Housing states that 'a community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies. Local Housing Market Assessments provide the evidence base supporting policies to deliver affordable housing through the land use planning system'.

- Ministerial Interim Planning Policy Statement (MIPPS) 02/2005 – Planning For Retailing and Town Centres. Amendment to sections 10.1 to 10.3 of Planning Policy Wales (2002). 3.2.3 References to national policy issues in the WAG objection letter have been identified to inform the study.

3.2.4 In addition Welsh Assembly Government has published the Local Development Plan (LDP) Manual. The Manual states that the new LDP system should aim to achieve the following objectives:

- **Informing LDP production through Sustainability Appraisal, incorporating Strategic Environmental Assessment**, to bring together evidence and consider the long-term implications of strategy options and policies in LDPs
- **Basing LDP production on effective community involvement**, to consider a wide range of views, with the aim of building a wider consensus on the strategy and policies for LDPs
- **Ensuring policy integration** by producing LDPs that are internally consistent and integrated with other main policies and strategies at national, regional and local level (without unnecessary repetition)
- **Delivering a faster and more responsive approach to plan-making**, with published timetables for preparation, fewer iterations of the plan before adoption, and regular strategic monitoring and review to enable plans to better reflect the changing circumstances in contemporary Wales; and
- **Making plans that are more strategic, concise and distinctive** in setting out a strategy for how an area will develop and change, based on a robust understanding of interdependencies between places (within and across administrative boundaries) and drivers for change.

Planning Inspectorate Wales Tests of Soundness

3.2.5 The soundness of the LDP will be determined by a Planning Inspector from Planning Inspectorate Wales rather than the WAG.

3.2.6 The Inspectorate has published a “Guide to the Examination of Local Development Plans” to assist local authorities in producing sound plans, and this clearly sets out the tests against which the LDP will be assessed. Appendix 1 of this report sets out the Consistency, Coherence and Effectiveness Tests for convenience.

3.2.7 The Conwy Borough LDP will be assessed against the soundness tests. We have considered the Welsh Assembly Government’s objection letter to identify which of the soundness tests it concerns.

3.3 **Welsh Assembly Government response**

3.3.1 On 2 July 2009, the Welsh Assembly Government wrote to Conwy County Borough Council regarding the Deposit version of the Conwy Local Development Plan (LDP). This response to the plan consultation raised issues regarding the soundness of the plan.

3.3.2 The Assembly Government stated that the Plan’s growth option does not tackle the key issues of a declining workforce, declining younger population and affordable housing, and that a higher level of growth is required.

3.3.3 The Welsh Assembly Government examined the LDP in accordance with the consistency, coherence and effectiveness tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). The Welsh Assembly Government objected in the following ways:

- Objection under soundness tests C2, CE2: Fundamental issues that we consider present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan’s strategy, are whether the level of housing growth and the affordable housing provision address the issues identified and the justification for the distribution of growth between settlements.

- Objections under soundness tests C2, CE1, CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:
 - A. Minerals – safeguarding and dormant sites coverage
 - B. Gypsy Travellers - specific site allocation/criteria policy
 - C. Flood risk - allocations in flood zone C areas
 - D. Employment - scale and distribution of sites
 - E. Infrastructure – provision
 - F. Historic Environment – allocation in WHS buffer zone
 - G. Waste – clarity regarding the capacity of existing identified waste management facilities, need for a fall-back landfill site and industrial land requirements
- In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated, that:
 - A. the strategy and policies are deliverable,
 - B. the plan is flexible to enable it to deal with changing circumstances,
 - C. the mechanisms for implementation and monitoring are sufficiently clear.
- Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes.

3.4 Baker Associates summary of WAG objections

3.4.1 One of the main aims of the study is to review WAG 2006 population projections and support the Council by providing recommendations on making a sound plan. The commissioning of this work is a direct response by members to the first objection set out in the WAG letter of 2 July 2009.

3.4.2 Baker Associates considers the first objection the most fundamental. WAG considers that the level of housing growth and the affordable housing provision do

not address the identified priority issues in the LDP. The main objection points relative to the soundness tests include:

- The significant deviation from the WAG 2006 based population projection
- Adherence to Housing MIPPS, that required the 2006 population projections as the starting point
- Failing to provide for migration, even the Council's own long term migration trends (10 -14 year)
- Does not address the Council's own priority issue of affordable housing
- Negative impact on economic prosperity of the County Borough
- Unclear relationship between the priority issue of protecting the environment in terms of allocations and the link with other priority issues, primarily employment, supporting communities and affordable housing
- Consistency between policies: scale of proposed employment relative to housing
- Detrimental impact on population structure and subsequently community services and facilities
- Rationale for development distribution, relative to priority issues.

3.4.3 Many of the objection points relate to the fit between policies and priority issues within the plan. The lack of a joined up approach is the fundamental concern. Secondary to this is the significant deviation from the 2006 WAG population projections that is not supported by evidence contained within the Deposit LDP.

3.4.4 The second WAG objection noted at para. 3.3.3 of this report relates to several issues where WAG considers that the Deposit Plan has not satisfactorily translated national policy down to the local level. The study has considered some of these issues including:

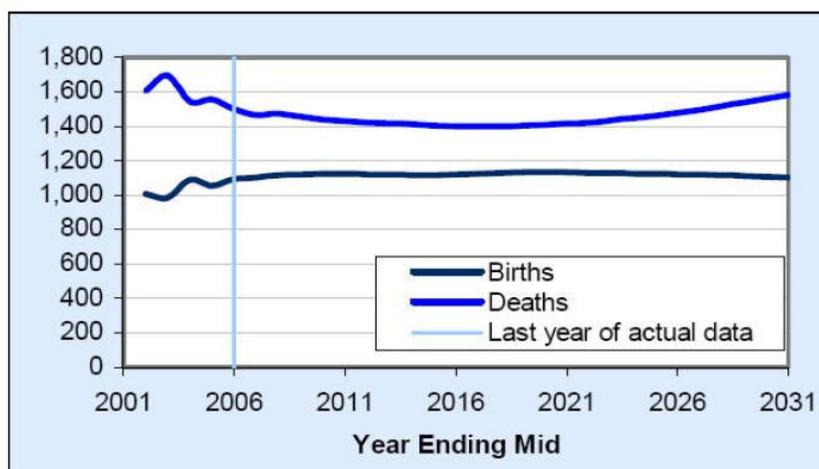
- Flood risk: concern that the plan is reliant on sites within flood risk areas.
- Employment scale and distribution: concern that the scale of employment is not linked to housing growth and not constrained by the Council's priority to protect the natural environment.

- Historic environment: concern that the plan is reliant on sites that have a negative impact on the historic environment.
- 3.4.5 The second WAG objection includes other issues, but they are beyond the scope of this study and report.
- 3.4.6 The third objection relates to the WAG view that there is a lack of certainty on flexibility, deliverability and mechanisms for implementation or monitoring. Primarily the objection relates to the need for clear delivery and phasing policies in the plan. The study has considered the issue of flexibility when considering land supply availability and the use of reserve sites or potential contingency policy.
- 3.4.7 The final WAG objection relates to the matter of clarity and removal of repetition of national planning policy within the LDP. Though a relatively straightforward one to deal with, this matter has not been addressed as part of this study.
- 3.5 **WAG 2006 population projections and alternative data sources**
- 3.5.1 The LDP growth strategy must use WAG 2006 based population projections as the starting point. The important consideration to remember is that population projections are only future predictions. What actually happens can be influenced by future Council policy related to housing and employment development. Future policy is likely to vary any forecast within the overall context of population change trends.
- 3.5.2 To determine the strategy for Conwy, the Council has needed to understand the 2006 projections and impact of potential variations in each of the components of population change such as migration, births and deaths. Recently 2008 projections have become available which serve to illustrate the potential variation in population forecasting.

- 3.5.3 The assumptions in the projection based approach which underpins the WAG 2006 household projections identified have been examined to identify the potential to challenge the reliance on these projections.
- 3.5.4 The outcome of this part of the study has been to separate population projections from future policy decision and illustrate the link between policy and development required to address priority issues. The aim has been to identify the range of population growth possible and supported by evidence, and to address the concern that the 2006 projection has not been used as the starting point and that the LDP deviates significantly without evidence to support the Council's position.
- 3.5.5 The brief contained specific emphasis on the examination of the 2006 population projections, but also required a review of existing alternative data sources. Following the review of the 2006 population/household projections in which we have sought to identify potential to challenge the underlying assumptions of each component of population and household change, this section also investigates alternative data that could be used to question and inform the formulation of the LDP.
- 3.5.6 Newer 2008 population projections have become available at the end of this study and the report has sought to incorporate the initial findings within the report.
- 3.5.7 The 2006 WAG population projections identify that the total population of Conwy is projected to increase by 15,300 (or 13.7%) by mid-2031. For the LDP this is likely to be in the region of 10,900 people by 2022. The headline figure from the 2008 projection is 9,100 (or 8.2%) by mid-2031. For the LDP this is likely to be in the region of 7,326 people by 2022.
- 3.5.8 The following paragraphs examine the three main components of population and household change.

Natural change (Births and Death)

- 3.5.9 The first component of population and household change is 'natural change', namely future birth and death rates.
- 3.5.10 Birth rates: The 2006 projections indicate that most recent actual data shows that births in Conwy have generally seen an upward trend. This upward trend is expected to continue in the initial years of the plan period and then the number of births will remain fairly constant.
- 3.5.11 Compared to the general pattern seen across Welsh local authority areas over the projection period, births in Conwy do not increase as sharply in the initial years of the projection. However the projected decline in births from 2015/16 onwards across Wales is also projected not to be seen in Conwy. This pattern is due to a projected decrease in the number of women in the high fertility age groups (25-34) in the first half of the projection period and then an increase in this group in the latter half of the projection period.
- 3.5.12 Death rates: Since 2002, deaths in Conwy have seen a downward trend. Over the projection period the number of deaths is projected to follow the general pattern seen across Wales, i.e. death rates across all ages will decrease. However, as people will live to an older age the death rate increases and therefore from around 2015/16 the number of deaths projected will begin to rise.
- 3.5.13 The WAG projections indicate that deaths will outstrip births over the LDP period to 2021 and beyond to 2031. This is shown in the chart below.

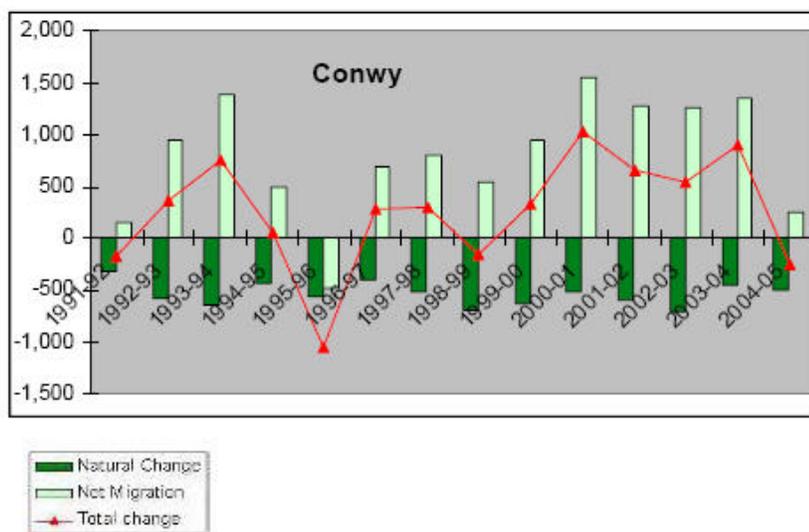


- 3.5.14 The number of deaths in Conwy is projected to decline until 2016/17 and then rise again to 1,580 in 2030/31. The Standard Mortality Ratio (SMR) for Conwy, however, is projected to continually decrease over the whole projection period until 2030/31.
- 3.5.15 Across Wales Total Fertility Rates are generally expected to increase until 2010/11 and then decline slowly until 2030/31, although still remaining at levels slightly higher than in 2005/06. In Conwy it is projected that the general pattern will be followed.
- 3.5.16 The 2008 projections indicate that natural change over the period to 2023 will be in the region of -300 people per annum. This level of deaths outstripping births is approximately the same as the rate of natural change projected in 2006.

Challenging natural change assumptions

- 3.5.17 Projections are based on actual counts of births and deaths compiled by Conwy County Borough Births, Deaths and Marriages Registry Office. This information is considered the best available.
- 3.5.18 Assumptions on both the future birth and death rates are relatively balanced and positive in nature for Conwy, i.e. a rising birth rate and falling death rate in the first half of the projection period, is reversed in the later part of the projection period to reflect wider Wales and UK trends.

3.5.19 Baker Associates consider that these trends are fairly favourable for the Council given the historical trend for deaths to exceed births in Conwy between 1991 and 2005. This is shown in the chart below.



3.5.20 The dark green bars show that deaths have occurred at a higher rate than births over the 1991 to 2005 period. The change seen in the death rates is due to two factors: Firstly the projected increase in life expectancy, which leads to a decrease in deaths in the early years of the projection as people live longer. Secondly, there is a cohort effect, in that if people are living longer, in future years there will be more people in the very elderly population (aged 90+), which is an age group with a higher SMR, leading to more deaths being projected.

3.5.21 The second factor illustrates that as the baby boom generation retire and get old they represent a larger proportion of total population with a higher tendency to die, counterbalancing the trend for greater life expectancy.

3.5.22 A challenge to this assumption would result in having to plan for a larger population due to a reduced death rate. The trend that life expectancy will increase but standard mortality will decrease is considered fair.

3.5.23 To confirm the natural change trends Baker Associates have examined actual births and death rates provided by the Council's Research and information team. The table below shows the birth rate and death rate for the 1995 to 2007 period. The final column shows the rate of natural change:

Year	(a) Births	(b) Deaths	Natural change = (a) - (b)
1995	1,142	1,701	-559
1996	1,221	1,657	-436
1997	1,209	1,714	-505
1998	1,164	1,679	-515
1999	1,089	1,767	-678
2000	1,086	1,653	-567
2001	1,068	1,659	-591
2002	992	1,662	-670
2003	1,046	1,594	-548
2004	1,068	1,520	-452
2005	1,044	1,509	-465
2006	1,149	1,518	-369
2007	1,107	1,515	-408

3.5.24 The table shows that between 1995 and 2007 deaths have been exceeding births.

3.5.25 In conclusion Baker Associates consider that there is minimal scope for the Council to challenge the assumptions underpinning changes in births, deaths and the rate of natural change.

Migration change

3.5.26 WAG 2006 projections suggest internal UK migration will result in a net increase of population due to more people moving to the County Borough than leaving it. This is projected to result in a net increase of 940 people per annum due to international and internal migration.

3.5.27 Internal net migration of people between Conwy and the rest of the UK is projected to be:

- Positive for both males and females, indicating more people arriving than leaving (net 985)
- Slightly higher for males than females (507 and 478 respectively)
- The 3rd highest for males and the 4th highest for females across all Welsh local authorities.

3.5.28 International net migration of people between Conwy and outside the UK is projected to:

- Show similar numbers of people leaving and arriving each year from overseas (net -43)
- Show similar levels for males and females.

3.5.29 The most recent data on natural change at the time of projection (2001-2006) shows that the population of Conwy has been fluctuating (increasing and decreasing). The population of Conwy is projected to increase over the whole projection period. The projected population increase is expected to be driven by migration, with 942 more people expected to move into Conwy than leave each year.

3.5.30 The migration trend used by the Welsh Assembly in the 2006 based projection is a short 5 year trend. Analysis of past rates conducted by the Council indicates that this short trend is based on a period of high net migration into the County Borough (a figure of 1020 people per year). It is considered prudent to ask whether this high trend is likely to continue in the future.

3.5.31 The 2008 projections highlight that this short term high trend is unlikely to continue. The 2008 projections assume net migration rates of approximately 600 people a year rather than the 2006 projection rate of 940 per annum.

Challenging migration assumptions

- 3.5.32 The brief has suggested that information collected by banks, credit card companies, phone companies, health care systems or school systems could be used to investigate this issue.
- 3.5.33 It needs to be noted that information within the private sector, such as records held by banks, phone companies and credit card companies, is unavailable to the Council or Baker Associates for reasons of confidentiality. Subsequently the analysis of alternative data has focused on publically available data sources, including:
- NHS Central Register and Patient Register Data System
 - Welsh Statistical Directorate
 - National Insurance Registrations on International Migration
 - ONS adjustment to student internal migration rate

NHS Central Register and Patient Register Data System

- 3.5.34 ONS produces estimates of internal migration within the UK at the country level and at more detailed levels, namely for Government Office Regions (GOR), Local Authorities (LA) and former health authorities level for England and Wales. ONS considers that these estimates currently represent the best available source of information on internal migration movements within the UK and have a direct impact on population estimates for LAs and other sub-national geographies.
- 3.5.35 Because there is no single system to record population movements within the UK, ONS derives internal migration estimates from two proxy sources. The first is the National Health Service Central Register (NHSCR) and the Patient Register Data System (PRDS).
- 3.5.36 The NHSCR receives notification when a patient in England and Wales transfers to a new NHS doctor within a different health authority boundary. Estimates derived from the NHSCR and ONS give the most comprehensive coverage of the

population and represent the most reliable indicator of internal migration within the UK.

3.5.37 However, these sources are only based at the broad geographic level of the former health authorities. Therefore, the PRDS data source is used to estimate internal migration at smaller geographical levels. This system holds lists of all patients and their respective residential addresses registered with each NHS general practice. ONS receives an annual download of each list allowing a comparison of a patient's postcode between consecutive years. Migration estimates between postcode areas can subsequently be estimated and geographically aggregated as required.

3.5.38 As part of the study we have examined the NHSCR for Conwy. The table overleaf shows the inflow, outflow and net migration rate based on GP registrations between 2000 and 2008.

Year	Age	All Ages	0-15	16-24	25-44	45-64	65+
2000-01	Inflow	6.6	1.4	0.9	2	1.5	0.9
	Outflow	4.8	0.9	1.1	1.5	0.7	0.6
	Net	1.8	0.5	-0.2	0.5	0.8	0.3
2001-02	Inflow	6.6	1.2	0.9	2	1.5	0.9
	Outflow	5	0.9	1.1	1.6	0.8	0.6
	Net	1.6	0.3	-0.2	0.3	0.8	0.3
2002-03	Inflow	5.2	0.9	0.8	1.6	1.3	0.7
	Outflow	4	0.7	1	1.3	0.7	0.4
	Net	1.1	0.2	-0.2	0.3	0.6	0.3
2003-04	Inflow	5.3	1	0.7	1.7	1.3	0.6
	Outflow	4	0.6	0.9	1.2	0.7	0.5
	Net	1.2	0.3	-0.2	0.4	0.6	0.1
2004-05	Inflow	4.4	0.8	0.7	1.4	1	0.5
	Outflow	4	0.7	1	1.3	0.6	0.5
	Net	0.4	0.1	-0.3	0.1	0.4	0
2005-06	Inflow	4.5	0.8	0.7	1.4	1	0.5
	Outflow	3.9	0.6	0.9	1.3	0.6	0.4
	Net	0.6	0.2	-0.2	0.2	0.4	0.1
2006-07	Inflow	4.8	0.9	0.8	1.4	1.2	0.6
	Outflow	4.1	0.7	1	1.2	0.7	0.5
	Net	0.7	0.2	-0.2	0.2	0.5	0.1
2007-08	Inflow	4.4	0.8	0.7	1.4	1.0	0.5
	Outflow	3.8	0.6	1.0	1.2	0.7	0.4
	Net	0.6	0.2	-0.3	0.3	0.4	0.1
2000-08 Average	Inflow	5.23	0.98	0.78	1.61	1.23	0.65
	Outflow	4.20	0.71	1.00	1.33	0.69	0.49
	Net	1.00	0.25	-0.23	0.29	0.56	0.16

- 3.5.39 The eight year average identifies an average net-migration rate of 1000 people per year between 2000 and 2008. This largely comprises people aged 45-64 at 560 per annum, but also children 0-15 at 250 per annum and people aged 25-45 at 290 per annum. The age category 16-24 shows an average decline of 230 per annum.
- 3.5.40 Retaining young economically active residents was identified as one of the Council's priority issues, however it should be noted that nationally the ages where people have the highest tendency to migrate is under 3, between 18 and 21 and around 60.
- 3.5.41 Within a person's life time migration trends indicate three main age peaks when people are more likely to move. The first small peak is when people are very young, as families move to family accommodation or their desired area to raise a family. The second is between 18 and 21. This is the point in a person's life when they are most likely to move and university graduates contribute significantly at this point, as they go to university and leave to find work. After this the likelihood to move decreases throughout life until approximately 60 when there is again a small spike to reflect people moving for retirement.
- 3.5.42 The 2006 projections are based on a 5 year trend before 2006. If projections were re-run, the 5 year average for 2003 to 2008 would be 700 per annum. The new 2008 projections use this low rate as the basis for projecting the future population and therefore represent the polar opposite of the 2006 projections with both projections representing highs and lows compared to average migration over the 1991 to 2008 period.

Limitations of GP data sources

- 3.5.43 Overall, the accuracy of NHS based data depends on patients re-registering with a new doctor when they change residence, or informing their current GP of any change of residential address. It is known that re-registration patterns vary by sex, age and socio-economic group.

3.5.44 ONS has conducted research to assess the feasibility and benefits of adjusting the estimates to account for variations, but no suitable data source currently exists that would facilitate any improvement to the current methodology.

3.5.45 Data from the NHSCR system is limited to movements between the former health authorities. These former health authorities no longer exist as administrative entities, but continue to be used due to technical constraints of the NHSCR processing system. PRDS data is also inadequate as a stand alone source as a number of 'within year' moves are not captured, including:

- migrant babies aged less than one year old
- new non-birth registrations e.g. ex-armed forces personnel and international in-migrants who join the NHS and then move within the same year
- people who move during one year but then leave the NHS register before the end of the second year e.g. the deceased, new armed forces personnel and international out-migrants

3.5.46 These reliability issues can lead to undercounting if people don't register, double count if people don't de-register and over and under representation of certain social groups that are more or less inclined to register. Limitation of estimates derived from a combination of NHSCR and PRDS include:

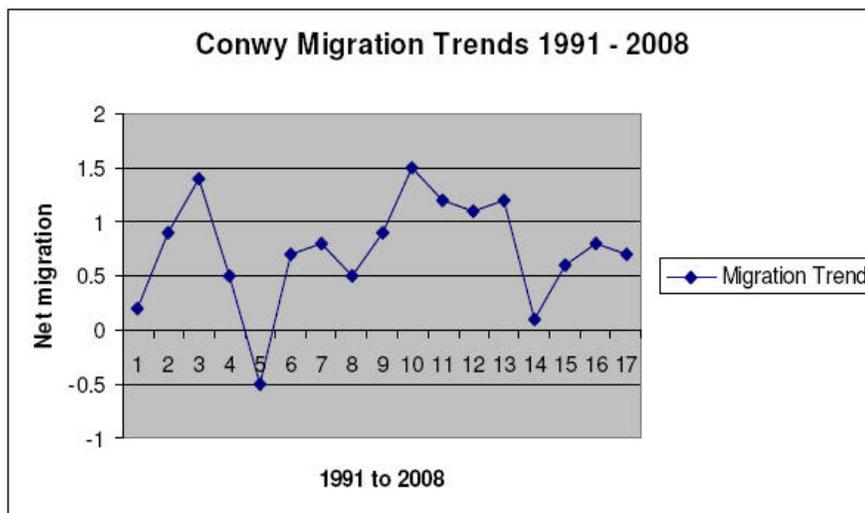
- there is variation in the delay between a person moving and registering with a new doctor
- some moves may not result in a GP re-registration and therefore will not be recorded
- individuals may move and re-register more than once in a single year but remain within the same health authority

Welsh Statistical Directorate

3.5.47 Welsh statistical migration rates illustrating the net flows into and out of the County Borough have been examined to illustrate past rates of migration. The table below shows net migration rates between 1991 and 2008:

Year	Net Migration Rate per annum
1991-1992	200
1992-1993	900
1993-1994	1400
1994-1995	500
1995-1996	-500
1996-1997	700
1997-1998	800
1998-1999	500
1999-2000	900
2000-2001	1500
2001-2002	1200
2002-2003	1100
2003-2004	1200
2004-2005	100
2005-2006	600
2006-2007	800
2007-2008	700

3.5.48 The table shows that net migration has primarily been into Conwy. The only exception was 1995-1996 which showed a net outflow of -500 people. The migration inflow rate has fluctuated between 100 and 1,500 people per annum. The chart overleaf illustrates the fluctuation over time:



3.5.49 Overall the all year trend for 1991 to 2008 is approximately 740 per annum, however depending on what range is selected, the migration trend does fluctuate. The table below illustrates that variation:

Time Ranges	Net migration inflow
5 year 2003 to 2008 (2006 Projection)	680
5 year 2001 to 2006 (2008 Projection)	1020
10 year 1998 to 2008	860
15 year 1993 to 2008	770
All years 1991 to 2008	740

3.5.50 Interestingly the most recent 5 years (2003-2008) used for the 2008 projection shows the lowest rate at 680 per annum, compared to the five years (2001- 2006) used for the WAG 2006 projection of 1,020 per annum. The latest 2008 Projections are based on a recent low trend and like the higher short term trend used for the 2006 projections it appears to be prudent to consider migration over the longer term. Baker Associates considers that migration over the plan period to 2022 will continue to fluctuate and a level of migration similar to the longer term trend over 15 years appears sensible.

ONS adjustment to student internal migration rate

3.5.51 The ONS continually adjusts and checks data sources as new and more accurate data becomes available. Emerging ONS data due for release in 2010 has been released in draft form. This identifies the annual and cumulative effects of changes in student internal migration.

3.5.52 The adjustment has used data from the Higher Education Statistics Agency to accurately trace student moves to and from college/university. Results have been checked against GP patient registers to make sure students are counted at their main place of residence. The data for Conwy is currently indicating a reduction in net internal migration of 100 people per annum, i.e. a reduction of the migration rate on which the 2006 projection are based.

3.5.53 At present the emerging data does not have sufficient status to inform amendments to the 2006 based projections but given the changes in migrations rates in the 2008 projections it does seem to have been taken into consideration.

International migration

- 3.5.54 The WAG 2006 population projections assume a net outflow of international migration of -43 people per annum. Members expressed concerns regarding the level of international migration and indicated that the rate could in fact be higher.
- 3.5.55 The 2008 population projections identify a net outflow of international migrants of -100 people per annum. This factor has contributed towards the lower overall rate of migration assumed in the 2008 projections.
- 3.5.56 Varying levels of international migration in different local authorities impact to different degrees. The demands on services vary with the size and nature of in-migrant flows to a locality. In-migrants are not homogeneous. Some come to work, some to study, some to retire. Some travel as family groups, some come to join family already here and some travel alone, therefore the impact of this group is difficult to ascertain as a distinct phenomenon.

International Passenger Survey and Labour Force Survey

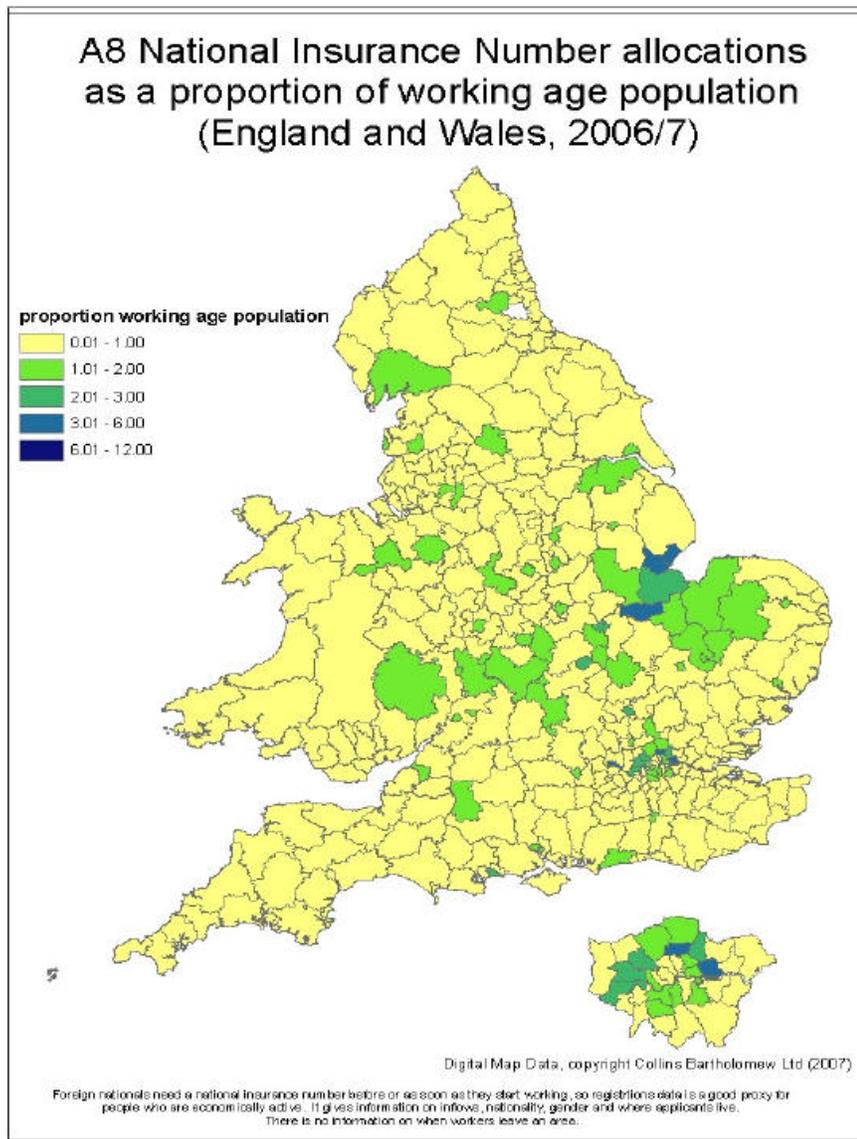
- 3.5.57 The International Passenger Survey (IPS) is a survey of a random sample of passengers entering and leaving the UK by air and sea, or by the Channel Tunnel. Over a quarter of million face-to-face interviews are carried out each year with passengers entering and leaving the UK through the main airports, seaports and the Channel Tunnel.
- 3.5.58 The labour force survey disaggregates this information to local authority areas, again based on a sample. The ONS continually adjusts and checks data sources as new and more accurate data becomes available. Emerging ONS data following revisions to the IPS is due for release in 2010. Draft results identify the annual and cumulative effects of changes in international migration.
- 3.5.59 The data for Conwy is currently indicating an increase in net international migration of an additional -57 people per annum, i.e. an increased in out

movement by international migrations to -100. The 2006 projection are based on a net out flow of -43, whilst the 2008 projections appear to reflect the new IPS data.

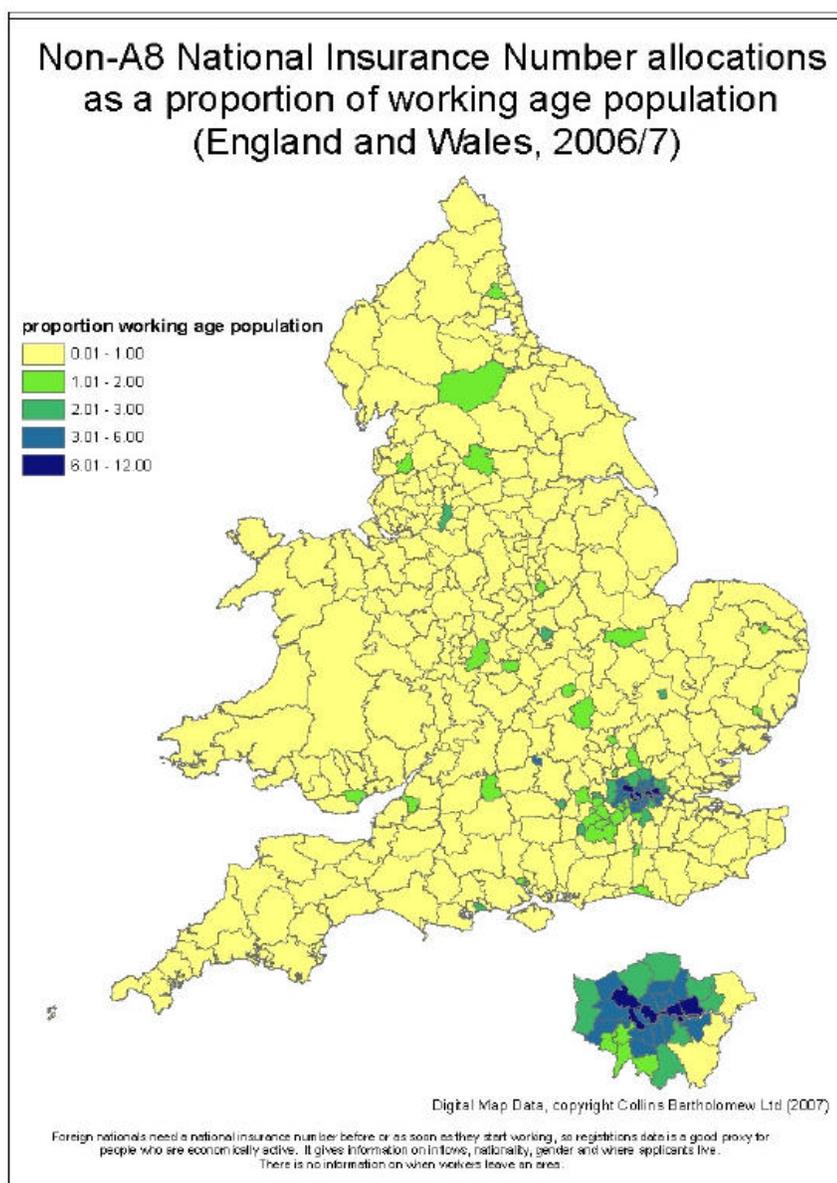
- 3.5.60 At present the emerging data does not have sufficient status to inform amendments to the 2006 based projections and it is uncertain if it has been reflected in the 2008 projections. Baker Associates consider that emerging data on internal and international migration is kept under review.

National Insurance Registration

- 3.5.61 International migrants to the UK come from many countries, those who work have to register for national insurance purposes. National insurance registration data has limitations due to non registration of migrants.
- 3.5.62 In-migration from the A8 Accession States (newest EU members), particularly Poland, has attracted much media attention. However, the movement from A8 states in 2005-6 constituted only 16% of long-term migration (i.e. for more than 12 months there is evidence of substantial shorter-term migration from A8 States in particular).
- 3.5.63 One reason for the attention paid to migration from the A8 States is that it has been more geographically dispersed throughout the UK. A substantial number of migrants from Poland, Lithuania, Slovakia and to a lesser extent other European States such as Portugal have gone to towns and rural areas with little previous experience of receiving international migrants. The diagram overleaf shows the distribution of A8 international migrants across England and Wales for the year 2006/7.



3.5.64 The diagram overleaf shows that like large parts of Wales and England, Conwy County Borough has less than 1% of all national insurance allocations as a proportion of working age population. Recent flows of migrants other than those from Eastern Europe have principally been to major conurbations and university cities, as the following map indicates.



Limitation with international migration data

3.5.65 The Local Government Association (LGA) considers that the current available data on international migration is inadequate.

- Measurement of international migration at the national level is based on a survey with a small sample of migrants, and does not count short-term migration or (more understandably) illegal migration
- The allocation of international migrant numbers to local authority level is based on evidence from the Labour Force Survey (which again has small

samples at authority level) and the 2001 Census, coupled with assumptions about migrant behaviour

- A range of administrative data sources gives sometimes quite different indications of migrant flows at the local authority level.

3.5.66 An Institute for Community Cohesion report commissioned by the LGA shows that, for some authorities, estimates from National Insurance or GP records differed from the official ONS migration figures by a factor of four; and that school census records sometimes give substantially different indications of numbers to official population estimates. Inadequate data on migration has affected policy within local authorities in three broad ways:

- Erroneous population estimates for some authorities have affected the level of funding that the authorities have. The policies and priorities of those authorities have therefore been constrained
- Well-targeted service provision depends on knowing the size and characteristics of the local population. Where the data is inadequate targeting will be less precise than it could and should be
- An ill-informed national debate around numbers can have a negative effect on community cohesion.

3.5.67 Existing data on international migration currently has reliability issues which bodies such as the Local Government Association have already highlighted to National Government. The inadequacy of data currently available does not appear to be a matter of contention. The National Statistician, the chairman of the Statistics Commission and the Governor of the Bank of England have all observed that statistics on migration are inadequate for public policy needs.

Changes to average household size

3.5.68 The final component of population and household change is a reducing average household size, i.e. the number of people living in a property on average. Average household size in Conwy is projected to decrease from 2.18 persons per household to 1.94 persons per household by 2031. By comparison, the average

household size in Wales is projected to decrease from 2.30 in 2006 to 2.03 by 2031.

3.5.69 For the LDP timescale to 2022 this could result in a decline from 2.15 (2008) to 2.00 by 2022. This will:

- Require new housing to support the existing population
- Require a greater number of homes to support any population growth.

3.5.70 Household projections are calculated by:

- Using population projections to calculate the projected number of people living in private households
- Using historical data to calculate projected household membership rates
- Multiplying the projected number of people living in private households by the projected household membership rates
- Dividing the results out by household size and aggregating by age, gender and household type to give the projected total number of households.

3.5.71 This process was carried out by local authority and for Wales as a whole. At present 2008 household projection are not available.

Challenging household size reduction

3.5.72 Variant projections are produced to illustrate the uncertainty which surrounds forecasts and projections, and the inherent uncertainty of demographic behaviour. For the 2006 household projections, variant projections have been produced using the available local authority variant population projections.

3.5.73 There is limited scope to challenge projections, but the type of housing supply will influence household size change.

Findings on scope to challenge WAG 2006 population projections

3.5.74 WAG 2006 population projections used the latest available information to identify the base year situation and are inevitably dependent on the accuracy of this

information. These population estimates were calculated using the internationally recognised Cohort Component Method – starting with the population data from the last decennial Census and updating them each year with the available data on births, deaths and migration.

- 3.5.75 The 2006 WAG population projections acknowledge that they have limitations. The local authority population projections only indicate what may happen should the trend-based assumptions become true. As the process of demographic change is cumulative, projections become increasingly uncertain the further they are carried forward.
- 3.5.76 Demographic change affects some populations more rapidly and more seriously than others. For some local authorities, because of the size of migration flows, migration assumptions are more critical than fertility and mortality assumptions and migration assumptions can have a significant effect on certain areas in the long-term.
- 3.5.77 In order to illustrate the uncertainty associated with population projections, WAG has produced variant projections alongside the main (or principal) population projection. Higher and lower variants have been published to illustrate the impact small changes in the assumptions can have over time, and in particular the cumulative nature of these changes. WAG notes that these are purely illustrations and should not be used as higher and lower thresholds. However, interestingly, the lower variation represents population growth in Conwy of approximately 7,000 people.
- 3.5.78 Both the 2006 and 2008 variant projections are based on the highest and lowest variant population projections produced by the Office for National Statistics. The high variant projection is based on assumptions of high fertility, high life expectancy and high migration. The low variant projection is based on assumptions of low fertility, low life expectancy and low migration.

3.5.79 It is considered that for the LDP to use the 2006 population projections as the starting point for production of the strategy and also be supported by evidence, the LDP must provide for development within the range identified in analysis undertaken in the study:

- Minimal scope to suggest any variation in natural population change
- Reasonable scope to suggest some variation in migration levels using alternative data.
- Limited scope to suggest any minor variation in household size decline

3.5.80 In conclusion Baker Associates consider that there is reasonable scope to suggest some variation in internal and international migration levels from that projected in the 2006 projections. This case is particularly strengthened by the release of the 2008 projections that confirm that lower migration is a reasonable assumption. The 2006 migration assumption is based on higher short term trends which has not continued in the last few years and may not continue in the future, historic data on migration trends illustrated in the study highlight that this has not been the case.

3.5.81 The Council would need to plan for population growth of 5,700 to 6,700 new people to support the all year migration trend (740) or the short term 2003 to 2008 migration trend of 680 net per annum. Population and household components combined provide the parameters within which Councillors can decide what key priorities they want to address and how much development they will require to achieve them.

3.5.82 The figures identified above are the lower end of the population range that the Council can choose to plan for, the top represented by the WAG 2006 principle projection figure of 10,900 dwellings. Our findings are that:

- Baker Associates consider that a requirement of 7,600 new homes, taking into consideration household reduction, would support a migration trend of 700 per annum and an overall population increase of 6,000 people. It is considered that this is the lowest justifiable figure that the Council can

robustly evidence a sound core strategy, using the 2006 projections as the starting point.

- Planning for an overall migration trend of 600 per annum in line with the assumption in the 2008 projections, which includes factoring into consideration the projected reduction in international migration, is comparable but lower than our identified range at 6,800 dwellings. It is considered that the 2008 projections reflect a very low migration assumption and could be considered as a minimum growth level.
- Population growth of 10,900 new people to support the WAG 2006 migration trend of 1020 net per annum (2001 - 2006 trend) is likely to represent the maximum growth potential.

3.6 **Review of other local authority LDP plans and challenges to population projections**

3.6.1 The brief for this work requires that examples of other challenges to population and household forecasts should be examined where these exist. The example below sets out the reasons why another Welsh Local Authority deviated from the 2006 population projections.

3.6.2 The Wrexham LDP has recently been put on deposit. A Cabinet report to Wrexham Council proposed to provide for 8075 homes and not 9990 that would fully meet the WAG population projections. The Council's reasons have been divided into two groups to report here, with the first group being those that could equally be applied to the situation in Conwy. These are:

- The Welsh Assembly Government household projections are no more than a continuation of past short term trends and the longer trends used for the LDP are more robust and appropriate
- The 8,075 target is appropriate for the currently predicted level of population and local and regional economic growth within reasonable levels of environmental impacts

- The 8,075 target would provide for 82% of the Welsh Assembly Government projections. This approach is comparable to that adopted in the other North Wales Councils that have placed their LDPs on Deposit (Denbighshire (77%))
- The 9,990 target would require extensive areas of greenfield land to be allocated for development, with major implications for the character and quality of local towns and villages, and the countryside that surrounds them
- The 9,990 target would impose huge additional burdens on the County Borough's infrastructure and community facilities
- The 9,990 target would lead to a large increase in the level of in-migration, which could damage community cohesion
- The 9,990 target would conflict with the views expressed by the vast majority of local people during the previous stages of the Plan's preparation.

3.6.3 It is considered that only the first reason relates solely to the population projections, whilst the remaining issues relate to the formulation of a sound plan for the locality and relationship between priority issues and development proposals. The following reasons put forward for Wrexham could be considered to undermine Conwy Council's case for lower provision:

- The 8,075 target can be provided within the terms of the Preferred Strategy without the development of green field land (other than for rural exception sites) and without the loss of public open space in wards/communities which have a deficit
- The 8,075 target will provide for the affordable housing need identified in the County Borough to a greater extent than relying on a percentage of a larger number of general market homes.

3.6.4 The differing availability of previously developed land for development and affordable housing demand result in Conwy being unable to address the same priority issues in the same way. This approach by another Welsh authority has assisted in the investigation and findings reported in the study.

4 Analysis of Policy Implications

4.1 Introduction

4.1.1 Section 3 reviewed the existing situation and examined the 2006 population projections and alternative data to provide a likely range of population growth. It also identified the main policy and evidence issues that the WAG objected to within the LDP.

4.1.2 Section 4 seeks to build on this work by considering the implications of future policy. The 2006 population projections are based on continuation of current population trends, assuming that past policy relationships and regularities continue. In reality the main tool at the Council's disposal to address its priority issues and subsequently affect future population change is the Local Development Plan (LDP).

4.1.3 The LDP should contain:

- Vision and objectives
- A spatial strategy for what type of development is to be provided for in which settlements and rural areas
- Proposals for development of specific sites for specific uses, with development briefs
- Policies to ensure required performance is achieved from developments
- Policies to allow for determining planning applications.

4.1.4 The study objective from the brief addressed in Section 4 is the **Analysis of Policy Implications** to determine whether the approach taken in the Deposit LDP (6300 Dwellings) 'is/or' can be supported by the evidence base and that the approach 'does/does not' contribute to tackling the priority issues impacting on Conwy. Now that the population range has been established, Section 4 contains the task of assessing the potential policy variation related to Council priorities to identify the likely impact on population and household growth over the LDP period (2007 – 2022), with regard to proposals and policies towards:

- Supporting community facilities and services

- Economic growth
- Housing (including affordable housing) and protecting the environment
- Other issues.

4.1.5 These matters are broadly addressed in turn, examining existing evidence and LDP policy.

4.2 Evidence and policy on supporting community facilities and services

4.2.1 LDP Policy DP/2 provides the overarching strategic approach to development. Background Paper 8 Settlement Review and Hierarchy, establishes the categories of different types of settlements adopted for the LDP. These include:

- Urban areas
- Tier 1 main villages
- Tier 2 main villages
- Minor villages
- Hamlets

4.2.2 Four of the Community Strategy themes relate to the improvement of existing community facilities, including education, retail, health and emergency services:

- A Healthy Place = better access to doctors and health centres
- A Prosperous Economy = support town centre/retail provision, improve the transport network and provide better childcare
- Strong and Safe Communities = crime and policing
- Encouraging Learning and Creativity = easy access to education (support local schools)

Average household size reduction by 2022

4.2.3 Alongside 2006 population projections, household projections have been produced to translate projected population into households.

4.2.4 2006 household projections identify a reduction in household size from 2.21 in 2001 to 2.00 in 2022. Across Conwy County Borough this could result in a

reduced population of approximately 9.5%. To support the existing population the County Borough would require 4,594 new dwellings just to maintain the existing population. At present no household projections have been released to accompany the 2008 population projections so it has been assumed that they will be broadly comparable.

- 4.2.5 The example illustrates the impact a reduction in average household size could have on the existing Census 2001 population, if no additional dwellings were provided, no migration occurred and household projections occurred in line with the 2006 WAG forecasts.
- 4.2.6 Whilst residential development will occur and people will move freely, this scenario illustrates that a decreasing household size will reduce population, reduce demand for employment opportunities and potentially undermine community services and facilities in each settlement.
- 4.2.7 The effect of household size reduction will affect all settlements to a lesser and greater extent in the future. How the Conwy LDP decides to distribute new residential development is ultimately an opportunity to provide additional accommodation to maintain population levels, reduce unsustainable travel, support community services and match jobs with the economically active people. The implications of a reduction in average household size could include:
- A reduced number of economically active people to fill jobs
 - A reduction of children of school age to support schools
 - A reduced number of people to support shops, health centres, leisure facilities and public transport
 - A more expensive housing market due to increased demand.
- 4.2.8 Ultimately a reduction in population could have an effect on community stability and cohesion, support for locally available schools, shops, social, health and leisure facilities, increase travel and undermine regeneration efforts.

4.2.9 In the workshops, Members examined the implications of a reduction in average household size on existing settlements and were presented with three broad options:

- **Allow a falling population** – the consequence of no new housing and decreasing average household size
- **Provide for a static population** – would require additional housing to maintain the status quo
- **Plan for growing population** – providing housing for a level of population over and above existing levels to support growth and maintain access to existing services.
- **The implication of supporting community facilities and services**

4.2.10 As part of the workshops settlement profiles were presented to show the impact a reduction in average household size could have on a settlement population, if no additional dwellings were provided, no migration occurred and household projections occurred in line with forecasts by 2022. Whilst residential development will occur and people will move freely, this scenario illustrates that a decreasing household size will reduce population, reduce travel and demand for employment opportunities and potentially undermine community services in each settlement. The effect of household size reduction will affect all settlements to a lesser and greater extent in the future. How the Conwy LDP decides to distribute new residential development is ultimately an opportunity to provide additional accommodation to maintain population levels, reduce unsustainable travel, support community services and closely match jobs and economically active people.

4.2.11 The following table illustrates the total population and age structure of the settlement identified in the census 2001.

	Total Pop	0-17	%	18-59	%	60+	%
Census 2001	10,016	1765	17.6	4447	44.4	3805	38.0

4.2.12 A projected reduction in household size from 2.18 in 2001 to 2.00 in 2022 could result in a reduced population of 9.5%, without appropriate levels of development, (in real terms a reduction of 951 people). Under the scenario this could have the following implications for a settlement of this size:

- Education - The settlement has 4 primary school with a capacity of 719 places. Current unfilled spaces equal 48 (2008). A reduction of population of school age due to reducing average household size could potentially create additional surplus spaces.
- The settlement is currently identified as a District retail centre. A reduction in population could result in a 9.5% reduction in retail expenditure. This will support existing retail provision and could potentially result in increased vacancies.
- The settlement currently has 1 GP surgery. The reduction in population could result in a reduction in patient numbers. This would not support increased access to health care. (In general GP's support 1,800 people, therefore a 9.5% population reduction could have implications for provision).

Findings on supporting community services

4.2.13 Overall it is clear that a reduction of average household size would have a wide range of implications for settlements. To address this and positively contribute towards addressing the priority issues in the County Borough, Baker Associates suggests that:

- Providing a minimum of 4,594 dwellings to balance the affects of a reduction in average household size by 2022. This provision would maintain the population at current levels
- Distribute housing specifically to support existing community facilities and services and best fit with LDP strategic objective and available capacity.

4.3 Evidence and policy on economic growth

4.3.1 The LDP contains several policies towards supporting economic growth. Policy EMP/1 states that "Economic growth is at the heart of Council's future objectives in promoting regeneration and meeting the B1, B2 & B8 employment land

demands over the plan period". To deliver this, the Council has proposed approximately 80 hectares (ha) of employment land (inclusive of committed sites, new allocations and windfall).

- 4.3.2 The Council's Employment Land Study (2009), undertaken by JOP Consulting, identifies that the 82 ha includes committed employment, current planning permission, under construction or completions of 24 ha and available land of 58 ha.
- 4.3.3 The JOP Employment Land Study (JOP ELS) identifies an expected B1, B2 & B8 employment demand of 24 ha (1.7 ha a year) over the plan period.
- 4.3.4 Analysis in the JOP ELS indicates that take up of land runs somewhat independently of employment change in the economy. It states that "the relationship between take-up and employment levels / change is complex and there are other variables that need to be considered to provide a more representative picture". It goes on to state that "this is very difficult to achieve because the data available simply isn't up to the task of measuring demand variability".
- 4.3.5 The additional employment land proposed above the 24 ha of demand identified, is provided on the basis that historical data suggests that employment supply relative to land demand needs to be provided at a ratio of 2, 3 or 4 times to allow for time lag and flexibility of take up.
- 4.3.6 Baker Associates have three main concerns with the scale of employment land proposed:
- The fit between employment provision and housing provision
 - The JOP ELS uses an employment density ratio of 100 jobs per ha to calculate the number of jobs on proposed sites. This is considered very low relative to commercial reports (such as Arup Employment Densities 2001)

and Communities and Local Government Guidance (ODPM Planning Employment Land Review 2004).

- The JOP ELS provides a large oversupply to enable flexibility and time lag between supply and demand take-up. Again this ratio is very large compared to Communities and Local Government Guidance (ODPM Planning Employment Land Review 2004).

4.3.7 Conwy Council assumptions are based on Serplan's work and are used elsewhere in North Wales. Baker Associates consider that ODPM guidance and Arup Employment Density work provides a more up to date view on employment density.

4.3.8 The JOP Employment Land Study (ELS) identified that the economy could potentially grow by 310 jobs per annum. If the forecast was correct it would equate to 4,650 new jobs by 2022. It suggested that likely growth sectors could include:

- Retail, distribution, hotels & restaurants
- Professional & other business services
- Health and education
- Other services.

4.3.9 Our study has also examined Nomis Data from the Annual Business Inquiry (ABI) to provide alternative data on how the economy has grown in the past. The Table below shows ABI information for Conwy for 1998 - 2008:

Employment Sector	1998	2001	2006	2008	Net change
Agriculture; hunting; forestry	54	101	217	154	100
Fishing	0	0	16	6	6
Mining & quarrying	81	74	79	84	3
Manufacturing	1,642	2,038	1,582	1,596	-46
Electricity; gas and water supply	63	53	109	204	141
Construction	2,299	1,721	1,795	1,896	-403
Wholesale & retail trade; repair of motor vehicles	6,737	8,326	7,754	8,011	1,274
Hotels and catering	4,841	4,633	5,549	5,164	323
Transport storage and communication	1,253	1,134	1,323	1,423	170
Financial intermediation	739	727	518	476	-263
Real estate; renting and business activities	1,978	2,376	3,192	3,254	1,276
Public administration and defence	2,522	2,225	2,280	2,579	57
Education	3,016	3,532	3,312	4,468	1,452
Health and social work	5,351	5,645	5,683	6,335	984
Other	1,830	1,832	2,104	2,390	560
Total	32,406	34,417	35,513	38,041	5,635

4.3.10 The ABI data illustrates that average economic growth within Conwy was 563 jobs per annum between 1998 and 2008. This shows that the economic potential of the County Borough could in fact be higher than the 310 jobs per annum identified in the ELS. The data does not reflect the current recession which is likely to show lower growth.

4.3.11 It should be noted that the period 1998 to 2008 saw high levels of growth without a major recession and probably represents the maximum economic potential. Given the current recession economic growth is likely to be somewhere between 310 and 560 jobs per annum.

4.3.12 Another good indication of economic growth is Business VAT Registrations. The table below shows the level of registration and de-registrations for businesses in Conwy between 2004 and 2008.

	2004	2005	2006	2007	2008
VAT registrations	515	465	405	425	360
VAT de-registrations	415	370	310	350	385
Conwy Net	100	95	95	75	-25

- 4.3.13 VAT registrations indicate the levels of entrepreneurial activity in the economy. For Conwy, registrations have exceeded de-registrations in four out of five most recent years for which information is available.
- 4.3.14 In Member workshops it was expressed that the Council wanted to see growth of small local business, and could help provide quality jobs. In 2008, 88% of all business start ups were small (1-4 people). It is considered very positive that Conwy has seen a good level of growth in small VAT registered business.
- 4.3.15 There are several reasons to pursue economic growth, including:
- An increased workforce means Conwy will be more attractive for businesses looking to locate in the area (better labour supply)
 - Increased economic diversity could provide better opportunities for retaining local people
 - Better quality jobs would help retain people and increase standards of living in Conwy
 - An economically active population will help support community services.
- 4.3.16 The evidence suggests that the Council has the opportunity to nurture the growth of the economy over the LDP period leading to an addition of between 310 and 565 jobs per annum.
- 4.3.17 In the Council's LDP members could take the opportunity of economic potential, which could supplement programmes to improved skills and hence access to new jobs by local people, business support services etc or actively discourage economic development, seeking to keep job levels as now.

The implications of economic growth

- 4.3.18 Member workshops identified that there was broad support for economic growth subject to its implications for other priority issues such as housing and protecting the natural environment. Broadly speaking, future employment growth is based on three components:

- Availability of good quality land/premises and appropriate infrastructure (physical capacity)
- Availability of adequate labour force and their skill level (social capacity)
- Attractiveness of the area as a place to do business, e.g. natural/urban environment, location of likeminded companies, and the presence of sector clusters (qualitative measures)

4.3.19 These factors will influence the level of growth and the different sectors that could grow. There are also other implications of pursuing economic growth which may be viewed negatively:

- Economic growth will require appropriate employment land and premises
- Average household size will reduce the existing economically active population and also require new housing for the economy to stand still
- Net increase of jobs has to be served by a net increase in economically active people and therefore new houses

4.3.20 It is important that the Council is confident that the right quantity and quality of employment land is provided to facilitate the desired economic growth that members choose. This is especially important to ensure micro and small businesses property needs are met. But equally important is the link between economic growth and labour supply, and therefore the level of change in the population and housing provision.

4.3.21 WAG has objected to the inconsistency of Council policy with regard to employment and housing, and to achieve a sound plan the Council must reconcile its objectives with its proposals.

Economic growth will require appropriate employment land and premises

4.3.22 The Council currently has a large stock of employment land available (circa 82 ha). Baker Associates have concerns about the Council's assumption of 100 jobs per hectare as the employment density to use in estimating the number of jobs that would arise from the development of this land.

4.3.23 The translation of jobs to land and premises comprises five key relationships, which requires assumptions to translate employment forecasts into land requirements. Those used are:

- Level of job growth not requiring new premises or requiring non B class premises
- Employment sector to type of property and land use classification
- Employment density (job to floorspace ratio)
- Building height
- Plot ratio (floorspace to site area ratio).

4.3.24 The following is an illustration of the issue. B1 office use has average employment density of 22 sq m per job, therefore 100 jobs requires 2,200 sq m. The average business park provides two storey buildings at plot ratio of 0.35. That is, only about a third of the site is used for the building with the rest comprising parking, service areas and landscaping.

4.3.25 On this basis, 100 B1 jobs on an out of town business park would require 0.31 of a hectare and conversely the number of jobs on 1 hectare is approximately 320 rather than 100.

4.3.26 Employment sectors such as distribution and warehousing are developed on a lower density basis. The ratio of jobs to land for B8 uses is approximately 100 jobs per hectare, but the example serves to illustrate that the Council should revisit its employment land proposals to ensure that the provision of land relates better to the potential economic growth in the County Borough in the following ways:

- More accurate assessment of job to land translation
- Review of proposals relative to likely employment growth sectors, a large proportion of future growth will require non B class provision.

4.3.27 The final issue with the appropriate provision of employment land and premises is the scale of the oversupply relative to demand. Communities and Local Government Guidance (ODPM Planning Employment Land Review 2004)

indicates that an oversupply of 1 to 10 years past take up can be added to overall supply to allow for flexibility in delivery.

- 4.3.28 JOP ELS analysis shows that the average annual land take up in Conwy was 2.12 ha per annum over the 2003-2008 period. Based on that rate of past take up this could equate to a maximum oversupply of approximately 21 ha, in addition to between 17 ha to 31 ha of forecast demand identified in the ELS.

Supporting the existing economically active population and businesses

- 4.3.29 Due to the effect of a reducing average household size, the population of Conwy will fall without housing development and subsequently less economically active people will live in the County Borough.
- 4.3.30 In 2001 there were 48,062 households and 46,780 economically active residents. The number of households to economically active residents equates to 0.97 jobs/people per household.
- 4.3.31 If all settlements within Conwy Borough were left in isolation average household size could reduce the number of economically active population of Conwy Borough by approximately 3,952 workers. Theoretically to simply support existing employment new housing provision of 4,594 dwellings would be required to support enough people to fill existing jobs. This is due to the fact that by 2022 there will be 2 people living in each household of which 43% will be economically active.
- 4.3.32 This is an extreme example, because settlements are not isolated, due to commuting. Housing development is likely to continue even at a low level, and at a low level of housing provision it is likely that the reduction in household size would be slowed, with some social consequences. However the 4,594 dwelling figure provides a useful starting point.

4.3.33 It should be noted that the example is based on positive assumption that economically active levels will remain constant at 43%. In reality due to the aging population this could reduce, but local and national objectives to reduce unemployment, encourage people to work longer and to provide people with better skills, are likely to counterbalance this trend.

4.3.34 Overall, a constant economically active population is a positive assumption, but will require Council initiatives to reduce unemployment and support older residents to continue to work longer just to maintain the existing economically active rate.

Economic growth requires economically active people and new homes

4.3.35 To provide for new economic growth a comparable level of homes will need to be provided to support population growth, specifically the growth of economically active residents (labour supply). In 2001, 43% of the population in Conwy were economically active (broadly in line with the Welsh average). If economic growth of 310 jobs per annum was pursued then 310 economically active people will be required to support these jobs and these new people would generally require accommodation.

4.3.36 If the Council assumed that the 43% economic activity rate could be maintained due to people working later in life and by reducing unemployment, 1 job will be required per 2.33 people and 1.16 homes. If the Council was to strive for economic growth of 310 jobs per annum, a total of 4,650 jobs by 2022, this would require population growth of 10,834 people and 5,417 homes.

4.3.37 It should be noted that this would be in addition to the number of homes required to maintain the existing population.

Workshop issues

4.3.38 Several issues were raised at the member workshops about the ability of the economy to grow without the direct need for new housing. The issues examined

below to identify the potential contribution any Council initiatives could have towards economic growth are:

- Reducing unemployment
- Reducing out commuting
- Bringing vacant properties back in active use.

Reducing unemployment

4.3.39 The unemployment rate in Conwy at December 2008 was 3.4%. The table below shows how the rate has fluctuated between June 2007 and December 2008.

Year	June 2007	Dec 2007	June 2008	Dec 2008
Unemployment Rate	2.6%	2.2%	2.4%	3.4%

4.3.40 Even in the best economic circumstances, such as those seen in the earlier part of the decade, unemployment rates did not fall below 2%. Based on this limitation it is considered that if the Council and other agencies strive to reduce the unemployment rate it could be conceivable that a reduction of 1.4% would facilitate 650 economically active workers without the need for subsequent housing provision.

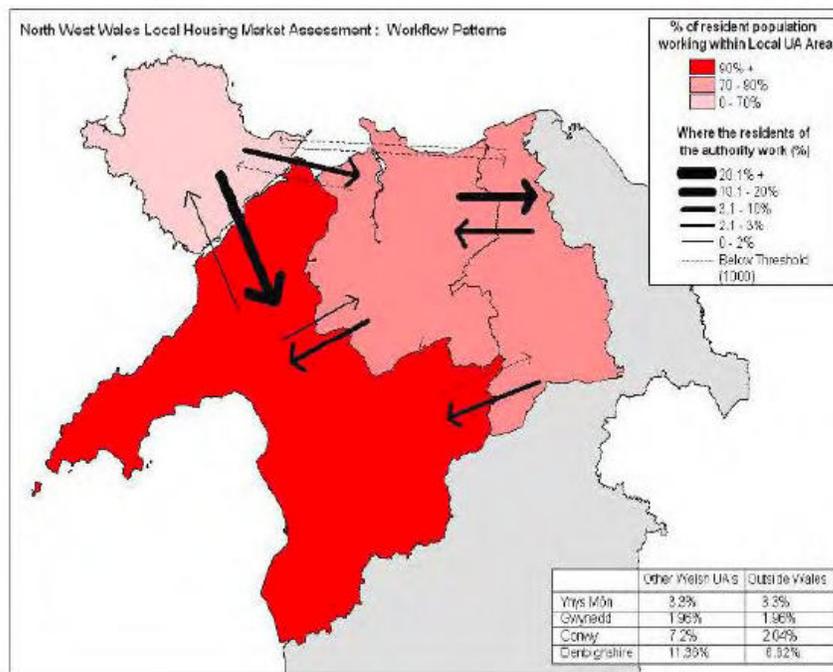
4.3.41 Caution should be expressed due to the assumption of constant economically active rates. With an ageing population, the Council will need to reduce unemployment and facilitate older residents to continue working just to maintain the existing economic activity rate. It might be prudent to consider that a positive result of 50% of this potential reduction could be achieved. This would result in a net increase of 350 economically active residents from within the existing population, resulting in a slight increase in the economically active rate overall by 2022.

Reducing out commuting

4.3.42 The most recent assessment of commuting published by WAG in 2009 identifies net commuting for Conwy Borough of 5,200 people out commuting. One objective

could be to potentially reduce the level of out commuting through the provision of economic growth. The diagram below shows 2005 commuting patterns:

Map 10: commuting patterns



Source: ONS Commuting Statistics 2005

4.3.43 The provision of more jobs than housing could lead to a reduction in out commuting, but overall the level of net outward commuting is unlikely to be reduced dramatically, due to the smaller and more rural nature of the County Borough. Only larger urban areas have sufficient population and employment to provide the variety of jobs required to support relative self containment. The large range of employment opportunities required to meet the needs of the economically active population is likely to result in a continuation of out commuting from Conwy into surrounding areas.

4.3.44 The Council has identified that new WAG offices will be opening at Llandudno Junction in 2010 providing an additional 600 jobs that residents would normally have to leave the County Borough to access. Baker Associates consider that this

could help to contribute towards an ambitious target to reduce out commuting over the plan period.

- 4.3.45 If the Council and other agencies could achieve a greater range of employment opportunities through diversification it could enable existing residents to live and work within the County Borough. Baker Associates consider that a reduction of 1,300 out commuters or 25% would be ambitious but potentially achievable, and could credibly be built into the assumptions informing future housing provision targets.

Vacant properties

- 4.3.46 Reducing the number of vacant properties in the County Borough could support population growth without the need for new housing. The Conwy Empty Homes Partnership (CEHP) identifies 1,070 vacant properties that are vacant for over 6 months, many of which are deteriorating physically. The CEHP pilot project (2008) seeks to bring back into use as many properties as possible, subject to funding and grant availability.
- 4.3.47 It is considered that the reuse of vacant properties for residential purposes could contribute towards economic growth without the need for new housing. Council housing land monitoring has identified 150 dwellings which could be brought back into use, facilitating 131 economically active residents based on a jobs/ homes ratio of 0.97. Baker Associates considered that the Council should monitor the progress of the pilot.

Findings on economic policy

- 4.3.48 Current Council priority issues include addressing quality employment provision issues and loss of population in younger age groups. It is clear that the LDP needs to reconcile policies on housing and employment.
- 4.3.49 Baker Associates suggest that:
- Economic growth contributes towards addressing the Council priority issues

- Economic growth between 310 and 560 jobs per annum appears achievable and desirable
- A minimum job growth target of 310 a year (4,650 jobs by 2022) is proposed; this will support existing employment and facilitate new job growth
- The Council and other agencies should use wider initiatives to continue to reduce vacant properties, unemployment and out commuting, potentially facilitating 1,800 economically active residents/jobs towards the overall job target
- Housing provision of 4,594 dwellings should be provided to support existing employment and economically active levels against the affect of a reduction of household size
- Housing provision of 3,113 dwellings could be provided to support new economic growth of 2,850 jobs, subject to capacity and environmental impact
- Overall the housing required to support 310 jobs by 2022 is considered to be approximately 7,900 dwellings
- As part of the plan monitor and manage process, a contingency policy could be provided to either:
 1. Allow the housing provision to support higher economic growth of 440 jobs per annum by 2022 (an extra 2,275 dwellings)
 2. Only release housing over the 6,800 dwelling minimum population range (e.g. 1,100 of the 7,900 total) if economic growth requires it.

4.3.50 The release of the contingency could be linked to economic growth rates, and potentially to a reasonable proportion of high quality jobs being created. It is considered that a contingency policy provides the flexibility for the Council to balance its competing priorities.

4.4 Evidence and policy on housing

4.4.1 Housing and the natural environment are key issues in Conwy. The level of housing identified through the 2006 population and household projections could require greenfield land take up due to the inability of brownfield development

opportunities within the built up area to accommodate the level of growth indicated.

4.4.2 The section will discuss the following interrelated housing and natural environment issues:

- Housing and affordability
- Housing mix and type
- Environmental and landscape designations
- Flood risk.

4.4.3 The LDP contains several policies on the provision of housing, affordable housing and housing mix. Policy HOU/1 proposes the delivery of approximately 6,300 new dwellings.

4.4.4 Affordable housing policy HOU/2 proposes that 50% housing is provided on an affordable basis. The LDP states that a shortage of affordable housing is one of the most pressing issues the County Borough faces.

4.4.5 Conwy Local Housing Market Assessment Phase 1 (2007) estimates affordable need at 331 dwellings per annum over the plan period, plus 319 units of current need. Overall need for affordable housing totals 5,284 units.

4.4.6 The Council has identified that the Affordable Housing and First Steps Registers identify 3,805 people in need of affordable housing. This figure is reduced by 50% to 1908 dwellings to take account of the migration of people and changes in the local housing market. The LDP identifies that delivery of affordable housing based on Council policy could provide for 1,920 dwellings.

4.4.7 Baker Associates consider that the Local Housing Market Assessment Phase 1 (2007) provides a more robust assessment of need compared to the Council affordable housing registers. In addition it is considered that the 50% affordable housing policy is very optimistic in terms of what can be expected to be delivered,

and the target is in any case unsubstantiated by any evidence that would enable the plan to be found sound on this point.

4.4.8 Wrexham Council considered whether it should recommend increasing the percentage of affordable housing required on general housing sites to 50% when preparing its deposit LDP. However, following a legal test case, Wrexham commissioned an Economic Viability Study of the provision of affordable housing to see if this could be justified. This study demonstrated that the provision of more than 30% would be economically unviable.

4.4.9 The Council's housing mix policy HOU/4 seeks 70% 1 or 2 bedroom homes (from sites of 5 or more dwellings). It is considered that this policy stems from the growth of one and two person households in Conwy Borough and nationally. Baker Associates would question the desirability of this policy with the Council's objective to retain and attract families to the County Borough.

4.4.10 The demand for properties in the UK is affected by the aspiration of residents to live in larger properties than the size of their individual household specifically requires, e.g. the desire for guest/spare rooms. A large contributor toward this trend is the understandable reluctance to downsize in older life when the younger members of the family have 'flown the nest'.

4.5 **Evidence and policy on the natural environment**

4.5.1 The natural environment is highlighted as a key issue in the LDP. It is one of the main themes in the Community Strategy and the first issue on the list of priority issues for the LDP. The Council states that "Conwy needs to use land efficiently, by locating development in sustainable locations and, where practicable, on previously developed land to protect the unique natural and built environment".

4.5.2 Policy NTE/1 seeks to support the wider economic and social needs of the Plan Area. It states that the County Borough Council "will seek to regulate development so as to conserve and, where possible, enhance the Plan Area's natural

environment, countryside and coastline. It specifically identifies the following environmental issues:

- Safeguarding the Plan area's biodiversity, geology, habitats, history and landscapes through the protection and enhancement of sites of international, national, regional and local importance, in line with Policy DP/6 'National Guidance'.
- Designating selected areas of Green Wedge in proximity to the Urban Development Strategy Areas to accommodate development to meet the housing needs of the community but also controlling further growth and to prevent coalescence of the settlements.
- Retaining and controlling the identity of individual settlements and the open countryside through the use of settlement boundaries to control development.
- Where appropriate and necessary, improving the quality of statutory and non-statutory landscapes, and areas of biodiversity value affected by development, through management agreements, including improved planting, landscape and maintenance specifications.
- Working with developers to safeguard protected species and enhance their habitats
- Seeking to minimise the loss of Grades 2 and 3a agricultural land to new development.
- Respecting, retaining or enhancing the local character and distinctiveness of the individual Landscape Character Areas
- Preventing, reducing or remedying all forms of pollution including air, noise, soil and water.

4.5.3 For the LDP to be supported by evidence there is an important distinction to be made between different parts of the countryside. Specific environment assets such as international, national, regional and local designations will have more weight due to their higher inherent value. Designations in Conwy include:

- Sites of Special Scientific Interest (SSSI)
- Ramsar sites

- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- National Park
- National Nature Reserves
- Local Nature Reserves
- Historic Parks and Gardens
- Ancient Woodland
- Heritage Coastline
- Country Park.

4.5.4 It is considered that there is strong justification to resist development that would have a potentially negative impact of these assets. The second category of environment assets relates to landscape quality. Again many areas within Conwy are valued for their landscape quality and are subsequently designated as landscape character areas within the LDP. It should be noted that landscape character is subjective and the depth of evidence underpinning such character designations needs to be comprehensive and consistent in its application.

4.5.5 WAG raised a concern that an allocation is located within the buffer of a World Heritage Site. Such buffer areas have no legislative or policy basis, but it is important that Council members and officers are confident that allocations do not negatively impact on important environmental and cultural assets.

4.5.6 The final area is general countryside and agricultural land. Whilst important, large parts of the countryside are not designated due to their environmental value, biodiversity of habitat or landscape quality. Agricultural land quality is a consideration especially for the more productive land. The LDP seeks to protect grades 2 and 3a.

4.5.7 LDP policy NTE/2 protects the countryside from development through the use of a green wedge policy to safeguard the undeveloped coast and countryside and to prevent settlements from merging.

- 4.5.8 A review of green wedge designations to inform the Deposit LDP has taken place (Background Paper 13 'A review of Green Wedge policy in Conwy County Borough'). The LDP states that to meet the levels of development and tackle the key issues impacting on Conwy, the Council has to assess which areas of land are most suitable for development and inevitably needs to allocate new development on the periphery of settlements which will mean some Green Wedge land being used.
- 4.5.9 In the Member's workshops was the strong feeling towards protecting the natural environment, including the open countryside from greenfield development. This issue divided member views to a certain extent, but the protection of the environment is a strong priority for the Council.
- 4.5.10 In addition to environmental issues flood risk is also an important consideration. WAG Technical Advice Note (TAN 15) includes a Development Advice Map (DAM). The DAM determines when flood risk issues need to be taken into account in planning future development. Three main zones (A, B and C) are identified, with zone C being further subdivided into C1 and C2. The table below reproduced from TAN 15 identifies what level of development is potentially acceptable within each zone:

Description of Zone		Use within the precautionary framework
Considered to be at little or no risk of fluvial or tidal/coastal flooding.	A	Used to indicate that justification test is not applicable and no need to consider flood risk further.
Areas known to have been flooded in the past evidenced by sedimentary deposits.	B	Used as part of a precautionary approach to indicate where site levels should be checked against the extreme (0.1%) flood level. If site levels are greater than the flood levels used to define adjacent extreme flood outline there is no need to consider flood risk further.
Based on Environment Agency extreme flood outline, equal to or greater than 0.1% (river, tidal or coastal).	C	Used to indicate that flooding issues should be considered as an integral part of decision-making by the application of the justification test including assessment of consequences.
Areas of the floodplain which are developed and served by significant infrastructure, including flood defences.	C1	Used to indicate that development can take place subject to application of justification test, including acceptability of consequences.
Areas of the floodplain without significant flood defence infrastructure.	C2	Used to indicate that only less vulnerable development should be considered subject to application of justification test, including acceptability of consequences. Emergency services and highly vulnerable development should not be considered.

4.5.11 The table illustrates that only zone C2 is an absolute constraint to development. WAG raised a concern that allocations are located within Flood Zone C. It is important that Members and officers are confident the allocations are not subject to flood risk. Allocations within Zone C1 require flood risk assessments to be undertaken. Alternative sites should be available which can be brought forward to ensure the LDP's delivery.

4.5.12 It is important to note that the assessment of all sites and areas surrounding settlements has not been part of this study. Currently it appears that the Green Wedge policy provides some flexibility towards the delivery of housing on greenfield sites and this may undermine part of the Council's objection to higher levels of growth.

4.5.13 There are several reasons to provide for housing growth, including:

- Provide affordable housing and general market affordability
- Retain young people and attract families

- Support the economy
- Support community facilities and services

4.5.14 However there are potential trade offs for the natural environment

Implications of housing growth on the environment

4.5.15 The implications of higher housing growth include:

- Increased greenfield land take
- Potential for greater impact on the natural environment designations
- Potential for greater impact on landscape designations
- Housing affordability
- Retaining young people.

4.5.16 The current LDP strategy proposes that 35% of housing development is directed towards Conwy, Llandudno Junction and Llandudno. A further 30% is aimed at Colwyn Bay, Rhos-on-Sea and Mochdre, and 20% to Abergele, Towyn & Kinmel Bay. The remaining 15% is proposed in Llanfairfechan & Penmaenmawr and the Main Villages. Within this strategy over half the development identified has been completed or given planning permission. It should be noted that in Abergele, Towyn & Kinmel Bay 86% of all the land identified has been completed or given planning permission.

4.5.17 The table overleaf sets out past completions between 2001 and 2006 for Anglesey, Conwy, Denbighshire and Gwynedd. It illustrates the level of past completions in recent years.

	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	Total Completions	Ave. Annual Completions
Anglesey	188	223	160	126	226	923	135
Conwy	353	340	499	419	384	1,995	399
Gwynedd	203	151	210	292	196	1,052	210
Denbighshire	306	350	360	282	210	1,508	302

4.5.18 The table shows that Conwy Borough has averaged 399 dwelling completions per annum over the period 2001-2006. Information about completions since the beginning of the plan period (2007 – 2022) shows the rate of completions is slightly lower than the previous figure. It also shows the split between greenfield and previously developed land. This recent information shows that for the last two years there has been a significant bias towards completions on previously developed land.

Completions (01.04.07- 31.03.09)	Greenfield	%	Previously Developed	%	Total
2008	51	13	346	87	397
2009	56	21	216	79	272
Total	107	16	562	84	669

4.5.19 Work has been done by the Council to identify which of the committed sites (excluding allocations) are greenfield sites and previously developed land. These sites have been split into urban and rural sites and figures for 1st April 2004 to 31st March 2009 show that the majority of commitments are classified as previously developed.

Commitments (01.04.04-31.03.09)	Greenfield	%	Previously Developed	%	Total
Urban	468	21	1,796	79	2,264
Rural	113	45	139	55	252
Total	581	23	1,935	77	2,516

4.5.20 The Council's Housing Land Monitoring identifies the level of housing currently completed, committed (with permission or under construction) and likely to come forward from other sources such as through the empty homes strategy, school

modernisation programme and undeveloped greenfield land in urban areas. The table below illustrates the current position at 31st March 2009:

Housing	Greenfield	Brownfield
1. Completions (01/04/07-31/03/09)	107	562
2. Commitments (01/04/04-31/03/09) excluding allocated sites	581	1,935
3. Windfall		1,557
4. Empty homes strategy		150
5. Undeveloped Greenfield Land in Urban Areas	161	
6. Exception Sites	18	
7. Agricultural Worker Dwellings	49	
8. School Modernisation		199
Total	916	4,403
OVERALL TOTAL	5,319	

4.5.21 The table above shows that the total number of housing identified for development is expected to achieve 5,319. In line with the brief, liaison with officers has resulted in a view on available development capacity. Planning officers originally recommended the growth scenario (8,000 dwellings) as the appropriate level, bearing in mind land availability and the impact on priority issues.

4.5.22 Officers are confident that there is sufficient available land not adversely affected by environmental and flood risk issues to accommodate around 8,400 dwellings over the plan period 2007 - 2022. The additional 3,081 dwellings are to be met by a combination of identified development sites (1,821) and 15% on contingency sites. It should be noted that these sites are all greenfield sites, and the idea of the contingency sites identified by the council is to allow the flexible delivery of the LDP, therefore if a target greater than 8,400 was pursued additional contingency sites would be required. It should be noted that the study has not included a review of existing greenfield development opportunities to confirm their suitability and has therefore been reliant on the view of Council officers.

Findings on housing and natural environment policy

4.5.23 Current Council priority issues include protecting the natural environment and providing affordable housing. It is clear that the LDP needs to reconcile policies on housing and environment.

4.5.24 Baker Associates considers that:

- The Council reviews greenfield opportunities to ensure that:
 - a) Environmental and historic assets are not negatively affected by development
 - b) Development opportunities are not subject to adverse flood risk. Sites within C1 will need contingency alternatives to ensure delivery of the LDP before appropriate flood risk assessments have been undertaken to confirm their suitability
- The Council reviews the Green Wedge policy to identify areas that are intrinsic to the value and character of individual settlement character or prevent coalescence.
- The Council should identify greenfield opportunities to accommodate a minimum of 6,800 dwellings as identified in section 3 as the low end of the potential population range.

4.6 **Additional issues**

4.6.1 At the Member workshops the issue was raised of the impact of a large transient population in the County Borough and the increased trend towards houses in multiple occupation (HMOs). The Council's Transient Population Task and Finish Group has undertaken work to analyse and highlight three main areas of concern to Conwy. These include:

- Caravan dwellers
- Houses in multiple occupation
- Net inward migration

4.6.2 The work involved the review of caravan parks in Towyn and Kinmel Bay to deter long term out of season or permanent residence. Population projections are only based on usual residential population, of which holidaymakers do not count.

4.6.3 The work reviewed a sample area of houses in multiple occupation in Colwyn Bay. The findings highlighted a concern that residents in HMO may not be counted within population statistics.

- 4.6.4 The work also conducted a survey of businesses in the Llandudno area to identify the level of migrant workers. The survey indicated that 400 migrant workers were currently in employment in the Llandudno area. Compared to National Insurance recording systems there was only 490 non UK national insurance number registrations throughout Conwy County Borough in May 2007.
- 4.6.5 Baker Associates consider that a large population indicated by the findings would disadvantage the Council, due to the increased burden of providing vital services without the appropriate level of funding. However, in terms of Baker Associates assessment of population and household projections the impact of a large transient population is likely to be negative.
- 4.6.6 For example, if unauthorised (year round) residents were included in population statistics it would increase the base population and the trend of net inflow of migrants into the area. The impact on the underlying assumptions is only likely to increase the scale of overall population growth in any population forecast.
- 4.6.7 The work undertaken by the Council serves to illustrate that the current approaches to counting the number of international and internal migrants within England and Wales is currently insufficient to the needs of local policy makers such as the Council. Baker Associates can only support the key recommendation of the Council's work, namely to utilise the press to promote and stress the importance of the census in 2011.
- 4.6.8 The final issue raised by Members at the workshops was the potential impact of planned growth in the Mersey/Dee Alliance area. Baker Associates consider that whilst the LDP must consider the relationship of the Council's plan with adjacent authorities, it is for the Council to decide the extent and distribution of growth for the County Borough.

4.6.9 Baker Associates acknowledges Conwy County Borough Member's concerns about the activity and motivation of the Mersey/Dee Alliance but are unable to address these concerns through the study.

5 Making a Sound Plan

5.1 Introduction

5.1.1 Section 5 of the report draws together the information gathered and analysis undertaken in order to provide recommendations to the County Borough on the potential level of growth to incorporate into the LDP. This final section addresses the Objectives set for the project by Conwy County Borough Council. These are:

- To establish a 'sound' level range of growth required using the 2006 based Population and Household Projections and the Council's low, medium and high growth scenarios which contribute positively to the priority issues impacting on the County.
- To provide a 'sound' direction to the appropriate range of housing e.g. between 'All Year Migration' and '10 Year Migration', taking into account the Officer's recommended growth scenario (8,000 dwellings) presented to Members as the appropriate level, bearing in mind land availability and its impact on the priority issues.
- To incorporate the outcome of the above processes into recommendations on the appropriate 'sound' level of growth required to support the revised Deposit LDP which contributes positively to the priority issues.

5.1.2 These matters are all addressed, drawing on all of the research undertaken and the workshops held during the commission.

5.1.3 During the project however, revised ONS projections have become available, using 2008 rather than 2006 data, and it has been necessary to reflect on this information. This material has emerged after the workshops and was not a part of the work by the consultants with the Members.

Objections by Welsh Assembly Government

5.1.4 This project arises from a disagreement between Conwy County Borough Council and Welsh Assembly Government on the level of housing provision to be made in the emerging Conwy LDP. Many of the objections raised by WAG relate to the apparent lack of consistency between the different elements of the plan. WAG has

raised basic concerns about whether the level of housing growth and the affordable housing provision can address the issues identified and about the justification for the distribution of growth between settlements. The issues raised include:

- Failing to meet the priority issue of affordable housing
- No examination of whether increased growth could be accommodated without harming the natural environment to an unacceptable degree
- The unclear relationship between the priority issue of minimal greenfield allocations and other priority issues
- The lack of housing having a detrimental impact on the economic prosperity of the County
- Incompatible growth scenarios and policies for employment and housing
- Detrimental impact on population structure and subsequently community services and facilities
- Insufficient rationale for development distribution relative to priority issues.

5.1.5 Such concerns were an implicit rather than explicit part of the consultants Brief for this project. However the project has come about because of WAG's objections and the level of housing provision is central to the matters raised by WAG. Finding a robust basis for the level of housing provision to include in the plan is essential, but the ultimate objective is a good and sound LDP. The work has been tackled on this basis.

Conwy County Borough Council Growth Options

5.1.6 To inform the production of the LDP, and prior to the consultant's involvement, the Council has considered a series of growth options prepared by the Council's officers. Based on the population growth options produced by the North Wales Research Group, the Council assessed five options for growth.

5.1.7 **Housing Option 1:** The option reflected the WAG (2003) base – mid point of 5 & 10 year migration, which sets down a housing target of 5,330 dwellings (355 per

annum). This option is effectively redundant as it does not take the 2006 projections as its starting point.

5.1.8 **Housing Option 2:** this growth option aimed for lower rate of growth of 420 dwellings per year to support a static population and past (5 year) housing completion rates. This set a target of 6,300 dwellings, and was the option pursued for the Deposit LDP.

5.1.9 **Housing Option 3:** this scenario aimed at a medium growth rate of 525 dwellings each year reflecting the 5 year past completion trend, but also all year migration and 10 year migration trends. This scenario proposed a total requirement over the plan period of 7,875 dwellings.

5.1.10 **Housing Option 4:** this growth scenario aimed at a higher growth rate of 670 dwellings each year. The option reflected the mid-point in 5 year migration trends (high trended growth experienced in recent years). This proposed a total housing requirement of 9,985 over the plan period.

5.1.11 **Housing Option 5:** the objective of this final growth option was to attempt to stabilise the School Pupil Population where there are currently areas experiencing high percentages of surplus spaces. It was suggested that an indicative housing requirement of approximately 13,065 might be required.

5.1.12 This report is not the re-examination of these options. It is an independent examination of the issues that should determine the approach to housing provision within the LDP. Inevitably however, a similar range of numbers is debated.

Approach

5.1.13 We have examined the level of housing provision that should be made in the Conwy County Borough LDP in three ways:

- By a rigorous examination of the population and household projections, with particular reference to likely demographic change and to the basis for predicting migration rates, looking at all of the elements that make up a forecast and at the arguments that might be made that higher or lower rates ought to be assumed
- By examining what the pursuit of the Council's priority issues would require or imply in terms of population change and housing provision, looking particularly at the maintenance of communities, access to housing, the provision for economic development and a concern to maintain the environment and the character of the Borough
- By considering how the strategy for the LDP can appear integrated, drawing heavily for this part of the work on two facilitated and progressive workshops for elected members to which all councillors were invited.

5.1.14 We have drawn conclusions on all of the elements that should contribute to the identification of an appropriate housing provision figure, and on how these elements combine. Most importantly, the thinking summarised here was worked through with the Members who participated in the two workshops, and was agreed by an informal but cross party Members group convened to take a view on the way forward on 26th April 2010. The conclusions that we draw from all of this work and which we put to the Council as the product of the commission are as follows.

5.2 Demographic issues

5.2.1 Within the demographic factors that will affect the number of people living in the County Borough and seeking homes in future there are a number of factors which can be debated and where an argument could be made for different assumptions, which would vary the level of provision the plan would need to provide for. The main components of any future requirement scenario building are:

- The balance of births and deaths amongst the 'existing' population
- The difference in the number of people leaving the County Borough and coming to live in the County Borough

- The number of households formed by a given population size and hence (with a slight variation) the number of dwellings required.

5.2.2 Our investigations, reported in previous chapters, demonstrate the scope for significant variation from WAG 2006 figures. By questioning birth and death rates and the likely average household size reduction there is limited scope for variation. Where a credible argument could be made that would have an effect, this is noted. It is also to be noted that the policies that the Council could adopt provide little basis for significantly affecting these demographic factors.

5.2.3 There is certainly scope for considerable variation from the 2006 WAG projections in relation to the migration element. Estimates of the numbers of people entering or leaving the Borough are based heavily on past performance and the rates of migration have varied considerably in the past. The 2006 WAG projections are based on a short period (2001-2006) over which the rate of net in-migration was very high at 1,020 per annum. The average rate over the full period for which reliable data exists is considerably lower at 740 per annum and this includes the last five year (2003-2008) which was low at 680 per annum. There is good reason to use data from as long a period as possible, in that this is likely to reflect the greatest range of contributory factors, and so there is a sound argument for basing the estimate of future migration levels on the lower past rate.

5.2.4 The 2008 projections assume an overall migration trend of 600 per annum, including internal migration at 700 per annum and international migration at -100 per annum. This projection is based on the low 5 year 2003-2008 period, which is one of the lowest periods of migration identified between 1991 to 2008. The 2008 projection is considered to reflect a low short term trend in a similar way to the 2006 projection reflects a high short term trend. This study has already identified a robust migration range and it is considered that the 2008 projections strengthen the Council's position by confirming that the 2006 projections are an overestimate of migration.

5.2.5 It is considered that the principle projections in 2006 and 2008 represent both the highs and lows in migration trends, when compare to trends over the 1991 to 2008 period.

5.3 **Conwy County Borough Council Priorities**

5.3.1 The Community Strategy (CS) and Corporate Plan provide the context and vision for the County Borough. The priority issues and strategic objectives for the County Borough identified in the LDP set out a list of issues to be addressed. It is the weakness of the link between the stated priority issues and the policies and proposals in the LDP that has drawn the most objection from WAG. A full summary of the Community Strategy, Corporate Plan, LDP Strategic Objectives and priority issues is set out in appendix 2.

5.3.2 Policies in the plan should seek to deliver on the agreed objectives and priority issues, with a clear link made, and with a compelling link between the plan and the evidence. For example, providing affordable housing is a strategic objective and priority issue in the corporate plan and Community Strategy. The LDP must therefore provide a clear way of making progress towards the delivery of affordable housing, and progress should be monitored. The same principle applies for housing and employment. If employment growth is an objective, the means by which land use planning has to achieve growth needs to be included in the LDP. If new housing is needed because households are becoming smaller, it follows that the policy should provide for the necessary level of additional dwellings to be available.

5.3.3 Many of the corporate commitments as well as the objectives of the Community Strategy themes are concerned generally with achieving growth such as more and better housing, employment and leisure opportunities, pursuing regeneration initiatives and improving transport infrastructure and services.

5.3.4 The priority issues are particularly concerned with achieving growth. Delivering on the priority issues implies more affordable housing and specific types of homes,

additional employment land, the enhancement of retail centres, promotion of comprehensive regeneration to broaden economic activity, exploiting tourism potential and increasing the use and provision of sport and recreational facilities. Unless this growth agenda is translated into policies which deliver the amount of development required to achieve these aspirations there is bound to be a question over the soundness of the Plan.

5.3.5 The spatial strategy of the current Deposit Plan appears contradictory in allocating a very high level of employment land whilst making provision for a low level of residential development. There is also a wish for a high level of affordable housing on residential development sites and a concern from the Members that more family housing is provided. The Deposit Plan however contains a housing mix policy which requires a high level of small units.

5.3.6 A good and sound Local Development Plan has to be a joined up plan. For Conwy this means that all parts of the Plan need to be justified and to work together to achieve the same direction of change for the County Borough. The present approach does not give confidence that the Council is pursuing a coherent and evidence based strategy.

5.4 **The basis for a realistic and sound LDP housing number**

5.4.1 This section works through a basis for the recommendation of a housing provision figure. There is no 'established' methodology for this task in making an LDP. Rather it is a matter of taking into account what should be considered, using the best evidence available, ensuring an informed discussion takes place amongst the decision-takers, and being able to explain the process and the choice to all interested parties.

5.4.2 The process we set out here to arrive at a recommendation reflects the way that the discussions in the workshops have been structured, and is a process in three steps.

- 5.4.3 The **first step** is to see what the demographic information indicates.
- 5.4.4 It is to be noted that because of the predicted changing average household size from 2.15 (2008) to 2.00 by 2022, providing for the existing population of Conwy will require 4594 new dwellings, and provision for anything less than this number of additional dwellings up to 2022 would be to accept, and indeed to plan for, a fall in the existing population.
- 5.4.5 Combined with the effect of an increasing proportion of elderly people in the population this would have significant adverse social and economic consequences for the County Borough and its community, though it might be argued that by requiring little development land this approach would maintain the environment of the area much as it is now. However there is no suggestion that the figure should be set as low as this.
- 5.4.6 The future population, taking account of the balance of births, deaths and migration rates, indicates that the number of dwellings for which provision should be made in the LDP by 2022 is in the range of between 7,600 to 10,900. The lower end of this range equates to the long term migration trend of approximately 700 people per annum, whilst the top end reflects the high short term migration trend of 985 per annum used in the 2006 projections. This range is determined by projecting forward the different levels of net in-migration that it is reasonable to use, based on the different ways that past trends can be interpreted.
- 5.4.7 It is important to note that this conclusion had been reached for the work on the basis of the 2006 projections. Access to the 2008 projections, where WAG has reflected the migration data for the later years, and calculated past rates for the time period now available, confirms that it is appropriate to use lower migration rates as the basis for assumptions about the future than had previously been the case. This project had got to that point already and so the range set out above is still the appropriate one to take from this first step, using demographic data.

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- 5.4.8 The 2008 projections identify that net international migration into Conwy could reduce. The 2008 projection increased the overall net reduction projected in 2006 from approximately -50 per annum to -100 per annum. This assumption has contributed to the reduction in the need for new households in the Borough to 6,800 dwellings rather than the lower figure in the identified range (7,600).
- 5.4.9 The lower end of the range represents a level of housing which (quantitatively) would provide housing for an increase in population of 6,000 people. Subject to the distribution of new housing, this increase was acknowledged by the majority of Members taking part in the informal workshops to be desirable in enabling some support to be given to the maintenance of the social structure of existing communities and to assist in supporting the maintenance of the facilities and services in existing settlements.
- 5.4.10 Mindful always that a good plan for Conwy that will be found sound when tested as an LDP, the suggested **second step** is to relate the possible level of housing provision to the possible economic potential for the County Borough.
- 5.4.11 At the lower end of the range indicated by the demographic considerations, the growth in the number of households would be significantly less than the number required to match the number of jobs for which there appears to be potential.
- 5.4.12 Provision for 7,600 dwellings would indicate an increase in the number of economically active people of approximately 2,585 people. The information available to the Council indicates that the potential exists for the number of jobs to grow by between 4,650 and 8,400. The former figure is from a previous employment land study undertaken by JOP Consulting for the Council. The higher figure arises from statistical Annual Business Enquiry data on the past year-on-year growth in jobs. The level of economic growth consistent with the higher dwelling figure of 10,900 is 460 jobs per annum. This would be a significant step towards achieving comparable economic growth, with past rates of 560 jobs per annum over the 1998 to 2008 period, given the current recession.

- 5.4.13 Whilst there are clear economic factors in the current climate that may suggest that the past high levels of economic success enjoyed by the County Borough cannot be expected to continue through the planning period, this past growth is still an indicator of what the Council and its partners could choose to strive for.
- 5.4.14 If the level of housing does not come forward that corresponds with the potential growth in jobs, because provision has not been made in the development plan, the potential growth in the local economy is unlikely to occur due to constrained labour supply and any growth could work against the Council's objective to reduce net out commuting from the County Borough for work, with a corresponding increase in car use.
- 5.4.15 The suggested way to address the relationship with potential job growth is to set the housing provision to correspond with the increase in the number of households that would provide the level of economically active persons the lower level of possible growth in jobs suggests. This is 310 jobs and about 8,600 dwellings, when a reduction of 15% out commuting, unemployment and re-use of vacant homes is taken into consideration.
- 5.4.16 In a further discussion with the Members group convened on 26th April 2010, this principle was agreed as a sensible way to proceed, with one further qualification. This was to assume that the level of work commuting out of the County Borough on a daily basis would decrease, with a greater proportion of jobs in the County Borough being taken by people resident in the County Borough. The requirement for new housing would fall accordingly. Following the meeting it was identified that the new WAG offices at Llandudno Junction would increase the potential out commuting reduction from the initially proposed 15% to a more ambitious 25%. On this basis the level of housing provision consistent with the lower end of the potential growth in jobs would be approximately 7,900 dwellings.
- 5.4.17 The **third step** is to relate the suggested levels of housing provision to the identified levels of affordable housing need in the County Borough, and hence

consider the contribution that would be made to meeting this need. The need is understood by the Council to be around 5,284 affordable dwellings by 2022. (A current requirement of 319 units and a further need of 331 dwellings each year of the remaining plan period).

- 5.4.18 It is probably realistic to envisage that no more than 25% of housing that is created will be affordable housing. Part of the total housing supply will be from sites that already have planning permission with s106 agreements reflecting lower policy aspirations. In future some of the supply will come from smaller sites that do not necessarily yield much or any affordable housing, and above all for development to take place at all it has to be viable for the developer.
- 5.4.19 On the estimation of 25% of the total housing provision being affordable housing, 1,975 units would arise from an overall provision of 7,900 dwellings and 37% of the identified need would be met. This would not represent a very significant contribution to the identified need, though any greater contribution clearly would require a much greater overall level of housing provision.
- 5.4.20 The contribution to the identified affordable housing need could be improved without additional open market housing being built, were the Council to develop its own land solely for affordable housing. Sites classed as '100% exception sites' may make a contribution too, though the precedent for much provision from this source is not great.
- 5.4.21 For comparison, the recent Wrexham Deposit LDP sets out a four fold approach to delivering their affordable housing target. This includes:
- Through thresholds and quotas on general housing allocations
 - 100% affordable exception sites outside settlement limits
 - 100% affordable housing site allocations on public sector land
 - 100% affordable windfall development, (although it is acknowledged that this approach is unlikely to be viable).

5.4.22 The **fourth step** in determining the appropriate level of provision has been to consider the capacity of the area to accommodate development, and particularly the requirement for 'greenfield' land to be used in meeting the housing supply. In the workshops there was a minority view, though very strongly held, that no development should be allowed on greenfield land and this factor alone should determine the future level of housing provision.

5.4.23 This matter has not been examined independently in this project, though the position according to the Council officers is that there is land identified for around 8,400 dwellings without significant environmental impact, though there would be a need to use some greenfield land.

5.5 Recommendation on housing provision figure for the LDP

5.5.1 In order to produce a plan which is a good plan rather than merely sound, in that it makes a positive contribution to the objectives of the Council and the community, the Council should seek to do a number of other things as part of an integrated package along with the setting of the level of housing numbers in the LDP. It will be essential for the spatial strategy to identify the intended roles for named settlements and categories of settlements together with the scale, location and form of development required as part of bringing about these roles.

5.5.2 This may require more work, such as visioning exercises and settlement profiles to be undertaken to ensure that there are an agreed set of council priorities for specific places. Policies must then be applied and developed consistently to deliver these priorities across the whole range of topics, and particularly in respect of housing and employment development. It is also considered that a revised approach to affordable housing should be considered in order to more effectively deliver this element of the strategy.

5.5.3 The means of delivering the development, including the housing together with the associated infrastructure, will have to be presented too. As the essential task for the LDP however this is not something that needs to be further commented upon

in this report, and nor is it the role of this report. If considerably more housing land is to be allocated, a more considered approach to its location and distribution would be required, probably based on a detailed settlement assessment exercise.

- 5.5.4 The policies for the provision of affordable housing, dealing with which settlements and which sites, and the proportion of affordable housing to be delivered from sites will have to be based on viability assessments and cannot be expected to be found sound if simply determined by dividing the affordable housing requirement by the overall level of housing provision.
- 5.5.5 The Council needs to be more explicit that protection of the outstanding natural environment and heritage is the Council's top priority as set out in the Community Strategy and consequently it needs to revise its priority issues. This reassessment would take account of the wish to only allocate land to meet existing needs of its community and minimum level of migration. A fundamental part of this approach could be a re-evaluation of the employment sites and assessing the appropriateness of alternative uses or use for employment beyond the plan period. This would need to be complimented by a reassessment of what regeneration and facilities could realistically be achieved with this level of growth.
- 5.5.6 The way in which the plan is to make provision for the envisaged potential growth in the economy and the creation of jobs needs to be aligned to the provision for housing. The allocation of employment land should be proportionate to the expected increase in the number of households and hence economically active people, as well as being part of an integrated package with other strategies, such as business support and training, reflects different ways in which jobs will come forward. It is an objective of the Council to use land efficiently and not allow the development of greenfield land if this can be avoided. The allocation of employment land unrelated to the growth in household numbers or without being clear how this allocation will lead to jobs should be avoided.

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- 5.5.7 There is a further and vital matter for the Council to consider here. A strongly held view from the Members taking part in the workshops was that development in the Borough should be 'employment led'. That is, the level of housing provision should not only be matched to, but should be determined by, the level of jobs being created.
- 5.5.8 Having regard to the household projections, the available demographic data, and all of the priority objectives for the Borough, and in order to enable a sound plan to be prepared, it is **recommended** that the Council makes provision in its forthcoming LDP for **7,900 dwellings**.
- 5.5.9 The plan could be set up so that in the event of there being greater growth in the economy and the number of jobs than would be matched by this level of housing growth, further housing could be allowed to come forward. The Council could choose to plan for the lower end of the demographic range (7,600) or 6,800 depending on the Council view of the 2008 projections, with a contingency policy to provide up to 7,900 dwellings required to support the 310 per annum economic growth potential.
- 5.5.10 Whilst a relatively difficult policy to design and implement we are confident that the Council could find a means of making this work, and if it were to do so, the Council could be satisfied that it was neither inhibiting economic activity that would be to the benefit of the area, nor letting inappropriate levels of greenfield land go to development. The basis of such a 'smart plan' would be:
- Establishment in the LDP of the amount of housing intended to be provided in each of a series of phases (of 5 years each, realistically)
 - Provision for a proportion of the housing through allocations
 - Criteria by which unallocated sites would be deemed to be acceptable, subject to the cumulative provision being within the ceiling set for that phase
 - Maintenance of a pool of suitable and deliverable land that could be used to provide housing (and other development)

- A monitoring arrangement identifying the number of jobs that were being added in the Borough on an annual basis
- 'Trigger' policies allowing an increase in the amount of housing that could be provided according to a numerical relationship between the growth in jobs and the growth in housing.

5.5.11 This 'plan, monitor and review' approach established as part of an LDP which sets out a clear strategy to deliver and manage change in order to achieve corporate and community objectives would demonstrate the positive commitment of the Council to good planning.

5.5.12 The basis for our recommended figure is summarised in the tables overleaf, which sets out for levels of provision above and below the recommended figure (low and high ends of the potential demographic range), the comparative impacts and benefits for each of the Council priorities of the provision of affordable housing, protecting the environment, supporting the economy and providing jobs and supporting community facilities and services.

Population Range Dwelling numbers	Impacts/benefits of option on each Council priority				Conclusion
	Provision of affordable housing	Protecting the environment	Supporting the economy and providing jobs	Supporting community facilities and services	
Lower End 6,800 dwellings (Based on 2008 Projection)	This level of housing will provide 1,700 affordable houses at 25% toward the identified need of 5,284 affordable dwellings. Low end of the range provides the least number of affordable homes at 32%.	The lower end of the range requires the least amount of Greenfield take-up, which ensures that the natural environment is protected.	The lower end of the growth range would not provide enough people to meet the forecast 310 jobs per annum as identified in the JOP Employment Land Study. The lower growth rate would provide for only 246 jobs per annum and support overall economic growth of 3,691 jobs over the plan period.	This level of housing will support community facilities and services, but provide less scope for retail and community provision improvements than higher housing growth	Lower end housing provision protects the environment more than higher growth and provides an element of affordable housing and new economically active people to take up new jobs. However it provides the lowest number of affordable homes at 32% of the forecast need and performs poorest at address the Council's priority in providing affordable housing. With the number of new homes required to sustain the existing population, due to household change, this option will not provide the number of people required to support the economic growth potential of 310 jobs per year. This level of housing growth will support existing community facilities and services, but only provides limited scope for increased retail and community provision. Overall lower growth does not achieve the Council's priorities of providing affordable homes and supporting the economy and providing jobs. It does support community facilities and services and is the best choice to protect the natural environment. Baker Associates have not recommended this level of housing as it is considered that it does not adequately address the Council's identified Priority issues or provide the basis for a sound Conwy LDP.

	Impacts/benefits of option on each Council priority				Conclusion
Population Range Dwelling numbers	Provision of affordable housing	Protecting the environment	Supporting the economy and providing jobs	Supporting community facilities and services	
Recommendation 7,900 dwellings	This level of housing will provide 1,975 affordable houses at 25% toward the identified need of 5,284 affordable dwellings. The recommend level of housing provides for a medium number of affordable homes at 37%	The recommended housing level will have an element of Greenfield land take-up. Conway officers have identified suitable sites that will not undermine the objective to prevent adverse impacts on the natural environment.	The recommended growth level would provide enough people to meet the forecast 310 jobs per annum as identified in the JOP Employment Land Study. The recommended level would support overall economic growth of 4,650 jobs over the plan period.	This option will support community facilities and services, to a higher extent than the option1 but to a lesser extent than the option 3.	The recommend housing level would require some Greenfield land, although officers are confident that this could be achieved without any detrimental impact to the environment. It provides more affordable homes and new people to take up new jobs than the lower end of the range. It does not provide for the full target for affordable housing need at only 37% of forecast need but does support potential economic growth of 310 jobs per annum including a reduction to out commuting. This level of housing growth will support existing community facilities and services and provide scope for growth in retail and community services which will further underpin the likelihood of achieving higher economic growth. This choice goes some way to support the Council's priorities of providing affordable housing, supporting the economy and providing jobs and supporting community facilities and services, but it would impact marginally more on the natural environment. This level of housing and employment growth is recommended as the best option to deliver on the Council priorities and provide a sound LDP.

	Impacts/benefits of option on each Council priority				Conclusion
Population Range Dwelling numbers	Provision of affordable housing	Protecting the environment	Supporting the economy and providing jobs	Supporting community facilities and services	
Higher End 10,900 (Based on 2006 Projection)	The higher end of the range will provide 2,725 affordable houses at 25% toward the identified need of 5,284 affordable dwellings. Even at the higher housing level the full need for affordable housing in Conwy will not be met. The higher end of the range provides 51% of need over the plan period.	The higher level of growth would require the most take up of Greenfield land. Currently this level of growth cannot be accommodated within suitable identified Greenfield sites (2,500 dwelling shortfall) and therefore this level of growth could have major implications for the character and quality of local towns and villages and the countryside.	The higher end of the growth range would provide sufficient population growth to support 460 jobs per annum. This would exceed the 310 forecast identified in the JOP Employment Land Study, but be a considerable step towards the 560 jobs per annum achieved in the past. The higher growth rate would support overall economic growth of 6,900 jobs and support increase economic growth and provide increase scope for better quality jobs.	This option will support retail, community facilities and services more than the other 2 options, by providing more people to all settlements.	The higher end of the growth range will meet go a long way to support higher economic growth potential that could be achieved in the County Borough and provides the most affordable housing with 51% of forecast need met. However, this level of growth would have implications for the natural environment that could undermine the Council's priority to protect the environment. Growth would use more Greenfield land that the Council has identified as potentially suitable for housing. This level of growth supports retail and community facilities and services to a greater extent than the other choices and is more likely to meet other Council priorities such as providing quality employment provision and retaining younger age groups. However on balance higher growth is not recommended as the preferred strategy by Baker Associates due to the unacceptable impact on the natural environment.

6 Appendix 1

6.1.1 Appendix 1 sets out the Planning Inspectorate Wales tests of soundness against which the Conwy LDP will be assessed.

6.1.2 The four **Consistency Tests** relate to both process and overall content. In making judgements about the degree of consistency, the Inspector will consider whether, from the process by which it was prepared, its content, and its strategy/policies/allocations, the LDP can be shown to meet the tests. Inspectors will, based on the relevant evidence, determine the weight that should be given to representations from bodies that are responsible for other relevant strategies that have been taken into account in the LDP.

6.1.3 **Test C1:** it is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas. Key questions:

- Does the plan put forward proposals for the use and development of land that adequately take account of the relationship with the plans/policies/requirements of other organisations, such as those of utility companies and agencies providing services in the area, including their future plans or strategy and any requirement for land and premises, which should be prepared in parallel?
- Is it clear how the plan relates to other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the plan?

6.1.4 **Test C2:** it has regard to national policy. Key questions

- If the plan contains any policies or proposals which are not consistent with national policy, is there local justification?
- Does it avoid wasteful/unnecessary repetition of national policy? LDPs are intended to be shorter, focussed documents that do not unnecessarily repeat national policy.

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- 6.1.5 **Test C3:** it has regard to the Wales Spatial Plan. Key questions
- Does the plan contain any policies or proposals which are not consistent with the broad strategies in the WSP and, if so, is there a local justification?
 - Does the plan take account of relevant area collaborative work undertaken for the WSP?
- 6.1.6 **Test C4:** it has regard to the relevant community strategy. Key question
- Does the plan have regard to the community strategy, by setting out policies and proposals which deliver key components of that strategy, which are consistent with higher-level planning policy and relate to the use and development of land?
- 6.1.7 The four **Coherence and Effectiveness Tests** relate to the content of the LDP. These are likely to be the key tests on which the examination will concentrate on.
- 6.1.8 **Test CE1:** the plan sets out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, is compatible with the development plans prepared by neighbouring authorities. Key questions:
- Do the policies and allocations clearly relate to the aims and objectives in the strategy set out in the submitted plan? It may help if policies are cross referenced to the key aims and objectives.
 - Are the policies within the LDP themselves consistent?
 - Are there any obvious gaps in the coverage of the plan having regard to its purpose and the relevant requirements set out in national planning policy?
 - Is it clear how the plan relates to those prepared by neighbouring authorities and how cross-boundary issues have been addressed?
 - Where there are overlaps, are these consistent/complementary?
- 6.1.9 **Test CE2:** the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust and credible evidence base. Key questions:

- Is it clear that the LPA considered the relevant options and alternatives in preparing the plan? LPAs will not be expected to deal with every possible alternative or option but they will be expected to consider those put to them during the process of preparation and engagement.
- Are the assumptions in the LDP set out clearly and supported by evidence?
- Does the evidence clearly support the plan's strategy and policies?
- Is the evidence robust and credible and has it been prepared in accordance with national planning policy and good practice guidance?
- Where a balance has been struck in taking decisions between competing alternatives – is it clear how those decisions have been taken?

6.1.10 **Test CE3:** there are clear mechanisms for implementation and monitoring. Key questions:

- Does the plan contain realistic targets and milestones which relate to the delivery of the policies?
- Is it clear how these are to be measured and how they are linked to the production of the annual monitoring report?
- Are the delivery mechanisms and timescale for implementation of the policies clearly identified?
- Is it clear who is intended to implement each policy? Where the actions required are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation?
- Do the processes for measuring the success of the plan accord with national planning policy and best practice guidance?
- Does the plan set out the factors essential to the delivery of key policy objectives of the plan?

6.1.11 **Test CE4:** it is reasonably flexible to enable it to deal with changing circumstances. Key questions:

- Is the plan flexible enough to respond to a variety of, or unexpected changes in, circumstances

- Are development control policies written in a form to enable them to provide a robust and consistent framework for considering planning applications?

7 Appendix 2

7.1.1 Appendix 2 sets out the Vision and Priority issues for Conwy County Borough

Corporate Plan

7.1.2 The Council's Corporate Plan 2008-2012 identifies the following issues:

- If you are older, we will support you to maintain your independence and place in your community by developing extra care housing schemes in Llanfairfechan, Llanrwst, Llandudno and Abergele.
- We will make sure our children get the best educational and social start by developing and putting in place a primary school modernisation programme that looks at education standards, whether our buildings and equipment are fit for purpose, unfilled places and access to resources.
- The quality of our environment and the street scene of our communities will be reviewed and protected.
- We will increase the number of allotments available in communities.
- Working with housing associations and housing developers we will develop affordable housing solutions for local people.
- As a Council we will work with local businesses to identify skills gaps. We will then support people to increase their skills and get into work so that they are less dependent on out of work benefits, have improved mental and physical wellbeing and increased disposable income.
- We will lead the way in making sure we contribute towards a sustainable future.
- Leisure and cultural provision will be reviewed in each locality and we will proactively support clubs, groups and projects which promote physical activity and healthy lifestyles.
- We will modernise the way we work and make our services more accessible.
- We will work with businesses to set up a business forum and then develop a package of measures to support businesses in areas in need of regeneration.

- We will talk to communities about the likelihood and possible consequences of flooding and coastal erosion, working to understand and manage their expectations of us and supporting them to be prepared for flooding, to minimise the consequences of incidents and to be able to revert to normality as quickly as is possible after flooding.
- We will make sure that the safety and efficiency of all forms of transport is improved and social exclusion is tackled by making employment, education, health and services for all communities more accessible.

Sustainable Community Strategy

7.1.3 The Community Strategy 2004 – 2014 has three overarching objectives:

- A County of outstanding natural beauty, which will respect, protect and enhance its environment and heritage.
- A community which supports those in need and offers a warm welcome to its many visitors.
- People who celebrate diversity, and who are intent on supporting a vibrant and thriving future for all.

7.1.4 These are supported by five themes:

- **A Healthy Place** = more affordable housing, more sheltered housing and better access to GP/health centres.
- **A Prosperous Economy** = more high quality employment, support town centre/retail provision, improve the transport network and provide better childcare. (Important to raise economic activity rates and illustrate the link between economic growth and infrastructure).
- **A Quality Environment** = protect environmental assets; provide more sustainable transport, better leisure facilities, better waste management (infrastructure).
- **Strong and Safe Communities** = crime and policing. Is a falling population over a dispersed area undermining police facility viability?
- **Encouraging Learning and Creativity** = easy access to education (support local schools) and better transport infrastructure.

LDP Strategic Objectives

7.1.5 Within the LDP the Community Strategy and Corporate Plan are then translated into Strategic Objectives in the Development Plan

- SO1. Ensure the needs of the community are met, whilst at the same time protect the natural and built environment, by promoting adequate and appropriate levels of development, locating development where practicable on previously developed land and primarily in the larger urban coastal settlements and along existing and proposed infrastructure networks, identifying and protecting key environmental assets, and ensuring an efficient density of development compatible with local amenity.
- SO2. To promote the comprehensive regeneration of Colwyn Bay, Abergele, Towyn and Kinmel Bay to broaden economic activity, address social exclusion and reduce deprivation through the Strategic Regeneration Area Initiative
- SO3. To provide land to enable an adequate and diverse supply of housing to contribute to needs, including affordable housing for local need, and to meet the need for Gypsies and Travellers, at a scale that is consistent with the ability of different areas and communities to grow.
- SO4. Identify and safeguard adequate land to meet the community's needs for more jobs and greater economic prosperity focussing, in particular, on higher value employment opportunities and skills development within and around the strategic hubs of Conwy, Llandudno, Llandudno Junction and Colwyn Bay and the strategic hub of Rhyl, St Asaph and Prestatyn including Kinmel Bay
- SO5. Encourage the strengthening and diversification of the rural economy that is compatible with the local economy, community and environment.
- SO6. Develop vibrant town centre destinations for shopping, business and commerce, culture, entertainment and leisure through the protection and enhancement of the vitality, viability and attractiveness of Llandudno as the strategic sub regional retail centre, and regeneration of Colwyn Bay town centre and other key shopping centres.

- SO7. Concentrate development along existing and proposed infrastructure networks and, in particular, at locations that are convenient for pedestrians, cyclists and public transport.
SO8. Assist tourism through the protection and enhancement of coastal and rural based tourism attractions and accommodation and further exploit the potential to develop, strengthen and encourage an all year round tourism industry;
- SO9. To encourage efficient patterns of movement and to recognise the strategic role that the A55 and the rail corridors will play in meeting the Boroughs development needs, and to give particular attention to development locations that are convenient for pedestrians, walking and cycling in Conwy to aid the reduction of transport CO2 emissions.
- SO10. Improve the design of buildings, including designing out opportunities for crime, to develop strong and safe communities and encourage the younger population to remain and return to the area.
- SO11. Reduce energy consumption through the careful siting and design of buildings and the promotion of renewable energy developments where they have prospects of being economically attractive and environmentally and socially acceptable.
- SO12. Safeguard and enhance the character and appearance of the undeveloped coast and countryside, sites of landscape/conservation importance, features of historic or architectural interest and ensure the conservation of biodiversity and protected species.
- SO13 To improve accessibility to essential services and facilities, including open space, allotments, health, education and leisure.
- SO14. To promote the prudent use of resources through the minimisation of waste and assist in providing an integrated network of waste management facilities consistent with the needs of the area and the waste hierarchy.
- SO15. Contribute to regional and local mineral needs in a sustainable manner.

- SO16. Ensure that development supports and sustains the long-term wellbeing of the Welsh language and the character and linguistic balance of communities within the County Borough.

LDP Priority Issues

7.1.6 The LDP priority issues have been developed from a range of sources. These priority issues appear to take forward the corporate commitments and strategic objectives. The priority issues are:

- Conwy needs to use land efficiently, by locating development in sustainable locations and, where practicable, on previously developed land to protect the unique natural and built environment.
- Colwyn Bay has experienced a significant decline in the tourism industry. There is a need to promote the comprehensive regeneration and renaissance of Colwyn Bay to broaden economic activity, address social exclusion and reduce deprivation, and limiting Houses in Multiple Occupation (HMO) through the Strategic Regeneration Area Initiative.
- More dwellings are needed because households are becoming smaller and in-migration. Therefore, there is a need to accommodate approximately 6300 new dwellings over the plan period primarily in the accessible and sustainable urban coastal belt locations and in areas where there is a high need for affordable housing.
- Conwy has an inadequate supply of affordable housing for local need. There is need to ensure the provision of approximately 1900 new affordable homes from the 6300 dwellings are provided not only in sustainable locations, but in areas of identified need over the plan period through identification of deliverable housing sites, policies, including exception and 100% affordable housing policies, and the development of Council owned sites where appropriate.
- Conwy experiences a high need for 1 to 2 bed properties.
- Conwy needs to consider the provision of a transit site to accommodate Gypsy and Travellers

- There is a need to accommodate the demand for approximately 58 Hectares of B1 (Business), B2 (General Industry) & B8 (Warehousing and Storage) employment land, provide a deliverable supply of stock to replenish take-up and safeguard existing B1, B2 & B8 employment land, utilizing the strategic hubs of Colwyn Bay, Llandudno & Llandudno Junction and Rhyl, Prestatyn, including Kinmel Bay and in the accessible urban locations of Abergele, Conwy and Mochdre over the plan period.
- Some retail centres experience pressure from nonretail uses. There is a need to maintain and, where appropriate, enhance Llandudno as the retail centre for the region, promote the regeneration of Colwyn Bay, as well as other retail centres and where possible enhance the overall shopping experience.
- The Plan Area experiences high levels of traffic congestion at peak hours. There is need to ensure that development is located appropriately to minimise the effect of traffic generation and encourage the use of sustainable modes of transport.
- The tourism sector results in an increase in unemployment over the winter months in Conwy. There is a need to encourage and, where possible, safeguard the tourism sector, particularly in the coastal resorts, exploit tourism potential, especially relating to the natural and built environment to encourage all year round tourism.
- The dominant mode for journeys to work, including high outward commuting, is by car within the Plan Area. There is a need for improved sustainable transport use and transport infrastructure in Conwy through the development of an integrated transport system, sustainable accessibility in urban and rural areas, public transport provision, modal interchanges, increased cycling and walking facilities and the encouragement of travel plans to reduce car dependency.
- Infilling within larger towns and villages within the Plan Area could detract from their distinctive character if clear design guidance is not provided and implemented. There is a need to insist on high quality sustainable design.

- Conwy is vulnerable to the impacts of Climate Change, in particular, to rising sea levels and sudden heavy rain storms leading to an increased risk of flooding. There is a need to use natural resources more efficiently and exploit renewable energy production through installed electricity generating capacity.
- There are 24 Conservation Areas in the LDP area, with 1436 listed buildings, 24 of which are Grade 1, 70 Grade II* and 1342 Grade II which are vulnerable to development pressure. There is a need for development to take into account the historic built environment, and ensure that design and build quality will help maintain and where appropriate improve on this quality in Conwy.
- There is pressure on wildlife species and habitats (biodiversity) from development. Where appropriate all new development should help enhance the biodiversity resource within the Plan Area and protect natural environment designations shared with neighbouring authorities.
- Existing urban and rural areas in the County Borough experience a shortfall of formal and informal open space. There is a need to increase the use and provision of sport and recreational facilities and open and green space through new development, safeguard existing and improve links to the countryside and coast.
- There has been an increase in the amount of recycled waste. Whilst recycling rates are good by County standards there will be a substantial amount of effort required to continue the improvement and to reduce overall waste levels, landfill, increase re-use/recycling of waste and safeguard existing sites.
- There is a need to provide a continuous supply of minerals to meet the needs of industry and community.
- There is pressure on the Welsh Language within the County Borough. Through the LDP there is a need to protect the Welsh language.

8. Appendix 3: Members Workshops Summary

8.1 Appendix 3 sets out a summary of some of the main questions and lessons learnt at the Second Member Workshop held at Venue Cymru on the 2nd February 2010.

Introduction

8.2 John Baker of Baker Associates presented an outline of the day, and described how Members would be involved in making the decision on a housing figure for the Conwy County Borough Local Development Plan. This day moved on from the general discussion of 15 January to make decisions on the appropriate level of housing provision.

Presentation – recap, introduction and general discussion

8.3 John Baker provided a recap from the discussion on 15 January and an introduction to the day, outlining the need to create a coherent strategy and create a clear policy and strategy line from Members. Baker Associates will take this away from the day and present something that reflects the decisions of the day, delivers for the County Borough and is a sound plan.

8.4 The following questions/issues were raised by Members and led into a general discussion:

8.5 Questions raised by Members:

- Baker Associates are the experts and should give Members an idea of where the Council should go, not the other way round.
- Baker Associates should provide Members with an idea of what you feel should be the right answer.
- Our evidence to support our plan was not right. Baker Associates should be looking for evidence either to support 6,300 dwellings or where evidence points to.
- Councillors went for a lower number because of emotion.
- Tourism depends on the character of the place.

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- The Council has already identified 1,500 homes on green field land. Concern about increase in green field land. □
 - Is there an overlap on providing for existing population and providing new jobs?
 - The change from 2.18 to 2 (for household size change) – is this a common figure.
 - Need to support and protect family homes, but homes are being broken into a number of homes. We want to encourage people to come back to Conwy (families).
 - Green field site already allocated in draft LDP. Do not want to allocate any more.
 - We are looking at more 1 or 2 bed properties. Would like to focus on 2 or 3 beds – not 1 or 4 bedroom homes.
 - Conwy needs a different mix as we still need 1 and 2 bed – none in one parish.
 - Go for local need housing, especially in rural areas.
 - The figure 37,500 – is the ‘employed in Conwy’ or ‘just employed’?
 - There is always too much talking and nothing happening. Councillors always saying ‘not in my backyard’. We need to establish how much housing we need, where it is going to go and provide a spread in rural areas. How are we going to do it?
 - Are there some sites we can go above 50%? Can we have allocations for 100% affordable housing?
 - Need to stop families moving out of Conwy.
 - For all new build we should aim for 3 people per household and then we will not need to build so many new homes.
 - There is a lack of strategy in the Council. Not convinced of the waiting list for affordable housing. What is the genuine local need? Concern we are building for economically inactive or for families.
 - Anyone can become homeless. Local people can come on hard times, especially in the recession and lose their jobs. There is only a small number

of people who are unemployed and claiming benefits. Should not paint all people with the same brush. If there is not enough housing then people are put into B&Bs, which is very expensive.

- 35,000 uneconomically active people in Conwy.
- Number 1 priority is regeneration and therefore this housing number won't deliver the right jobs.
- Corporate priorities – regeneration also includes improving the environment and not just about providing jobs.
- It is not easy to create jobs – need to depend on others to come in. Need an attractive place to come and skill up local people.
- Green field provides threat of flooding and some people might have to be relocated.
- Reduce number of homes by in-commuting and empty homes.
- If you create work, then people go where the jobs are.
- We accept that there may need to be a compromise to delivery on the whole strategy.
- We want a plan that makes Conwy a better place. If we reduce employment then people will disappear.
- We do not have enough brownfield sites.
- The Country is too dependant on housing growth and financial services. We are not out of recession and still long way to go.
- There are 1500 young people leaving school each year and we want to retain these people. The housing numbers won't deliver to retain these people. It does not reflect the needs of young people. Should be looking at regenerating brownfield sites as well as developing greenfield sites.
- Worry that LDP is so weak that developers are coming in. If the LDP is not found sound then developers will be creating communities that we don't want.
- How much greenfield sites/land do we need?

8.6 Lessons learned:

- Baker Associates will build evidence into the reporting, but decisions need to be made by Members at the end of the day.
- The right answer is only the right answer for the County Borough following all objectives.
- In looking forward, we will need to look at past trends. In the past there have been various levels of migration. We will support lower levels of migration. But we still need to look at direction/strategy for employment etc. The Planning Inspector will ask if you have got a clear basis for what you want to say. Have you got the right employment figures for example?
- WAG can only object to the plan. The Planning Inspector will decide if the plan is right or not. The Council need to decide if the LDP is right or not too.
- It is important to retain character of place for tourism, but it has to be consistent with economic growth and affordable housing delivery. CPRE has produced a report trying to look at arguments on growth and projections and this will be examined.
- There are a number of drivers and they need to be balanced.
- Not convinced the Council will get 50% affordable housing. Providing 10,000 new homes will provide only half the need for affordable housing.
- If the Council decide that no further green field land will be provided for housing then this will impact on the number of houses delivered, including affordable housing.
- Household change from 2.18 to 2 is a common trend. We are able to play around with these figures a little bit, but there are still some fundamental points.
- To encourage people to move back to Conwy there has to be housing and it has to be of a certain type. This is not just about housing numbers, but also policy for family housing for certain settlements. Current policy is for 1 or 2 bed homes, which restricts the number of family homes.

- If only allocating what is already allocated for green field land in the draft LDP, then this will go to 7200 homes. This will deliver two thirds of employment growth and be low on affordable housing contribution.
- There will be local variety in the need of housing size. Families contribute to schools/services and are economically active.
- In the past, Conwy has not been as successful on delivering for local need housing as the Council would have liked to have been. Difficult to define local need and affordable housing. Need to focus on local need in future so that people can stay in their community. In rural areas, small green field sites are preferred to large green field. Urban areas – not so much local need as rural areas, although each settlement has a different type of local need.
- 37,500 are employed inside Conwy.
- Need to be clear where housing is going to go – which settlements and sites and how much affordable housing is going to be delivered. How much proportion of market housing will be affordable housing and where is it going to be delivered (settlements and sites)?
- The Council can allocate sites for above 50% affordable housing, but the question is whether anyone would still be able to deliver. The Council might find it difficult to convince the Planning Inspector that the site is deliverable.
- Building bigger homes will not increase the household size to 3 people.
- 7200 new homes will provide 180 jobs a year.
- It is important that local need housing is definitely for people of local need.
- Low job provision will not provide the better jobs.
- Align growth with employment by keeping people in Conwy and skilling up to retain local people. Conwy is not going to get a new big factory. The local environment is attractive to some type of businesses.
- There is lots of allocated employment land – does the Council need all of this? Could some of it be transferred to housing land? Any suitable for housing land?
- Where the Council are going, protecting green field sites, will not deliver economic growth.

- If recession continues then Conwy may not need to worry about housing levels, if this is true. Jobs in the area are being created.
- Link jobs to homes. Have a contingency in looking at the number of jobs coming forward. In the event of job growth increasing – could then provide more housing, therefore not wasting greenfield sites and providing houses to match jobs.

9. Appendix 4: Glossary of Terms

Affordable housing	Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.
Allocation	Land which will be proposed for development, which will be identified in a Proposals Map in the Local Development Plan.
Annual Monitoring Report	A report that will assess progress with, and the effectiveness of the Local Development Plan when it has been adopted.
Community Strategy	Local authorities are required to prepare these, with the aim of improving the social, environmental and economic well being of their areas. In Conwy, the responsibility for preparing the Community Strategy rests with the Conwy Local Strategy Partnership.
Commuting	Commuting refers to journeys to work that cross local authority boundaries. Outward commuting refers to journeys by residents of Conwy County Borough to work in other areas, whilst inward commuting refers to journeys by residents of other areas to work in Conwy County Borough.
County Borough	This refers to the whole area for which Conwy County Borough Council is the unitary authority, including that part of the Council's area that lies within the Snowdonia National Park.

Deposit Plan	A formal stage during which organisations and individuals can make representations on the detailed policies and proposals.
Development plans	Are plans that indicate the type, location and scale of future development, and which areas need to be protected from inappropriate development. Decisions on planning applications must follow the development plan, unless there are good planning reasons. See also Local Plan, Local Development Plan, Structure Plan and Unitary Development Plan.
In-migration	Residents who move from outside the Plan Area to within the Plan Area.
Local Development Plan	The required statutory development plan for each local planning authority in Wales under the Planning and Compulsory Purchase Act 2004.
Ministerial Interim Planning Policy Statement (MIPPS)	Changes or updates to national planning policy are issued in Ministerial Interim Planning Policy Statements (MIPPS).
Office for National Statistics (ONS)	ONS is the executive office of the UK Statistics Authority, a non-ministerial department which reports directly to the Parliament of the United Kingdom.
Previously developed land	Land which is, or was, occupied by a permanent structure and associated fixed surface infrastructure. It includes areas around buildings such as gardens, but not parks, agricultural or forestry buildings or land on which the remains of buildings have blended into the landscape

over time. There is a fuller definition of previously used land in Figure 2.1 of the Welsh Assembly Government's document 'Planning Policy Wales'.

**Supplementary Planning
Guidance (SPG)**

Guidance on policy issues in a form that is more detailed than what would be appropriate in a development plan. SPGs must relate to development plan policies, and are relevant in deciding on planning applications.

Wales Spatial Plan

A plan prepared and approved by the National Assembly for Wales, which sets out a strategic framework to guide future development and policy interventions, whether or not these relate to formal planning control. Under the Planning and Compulsory Purchase Act 2004, a local planning authority must have regard to this plan in preparing an LDP.

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