

Conwy LDP Reg 15
WAG Response: Annexe

C1 Regard to land use planning matters and other relevant plans, policies and strategies relating to the area or to adjoining areas.	
Comments	Suggested Actions
<p>1 Generally the plan is too inward looking. It could be less limited in its outlook. Connections should be made across both NE & NW Wales and the opportunities this presents should be explored.</p> <p>2 There could be more evidence in the documents of a dialogue with neighbouring authorities to explore the relationship between Conwy CBC and surrounding areas. This would avoid the appearance that the plan is going ahead in isolation of collaborative area work and without full consideration of the impact on/implications for the plans of adjacent LPAs.</p> <p>Detailed examples include :-,</p> <ul style="list-style-type: none"> • The Housing MIPPS (para 9.2.2) sets out the Assembly Government’s policy on the level of provision for housing. It states that local planning authorities should work collaboratively with each other and other stakeholders to either apportion the Assembly Government’s housing projections, or where these are not accepted, to agree their own policy based projections. Growth options explored are based largely upon endogenous factors. There needs to be more evidence of regional collaboration relating to the underlying assumptions of growth on a strategic regional (North Wales) scale, with other neighbouring local planning authorities and external stakeholders and a related local apportionment. • Although the Options Report does contain some assessment of the employment capacity of neighbouring local planning authorities there needs to be more evidence that the Preferred Option is informed by strategic thinking which considers the major drivers of economic change in North Wales over the next few years and a sectoral analysis of the major employment sources in North Wales and in Conwy.. 	<ul style="list-style-type: none"> • Where such work has taken place it should be transparent and summarised in the introduction to the plan. • Ensure collaborative working takes place and is transparently recorded and that it influences, and is shown to influence, the choice of options. • Undertake/review collaborative regional working in respect of population/housing. • Ensure that it is clear how the review of other plans and higher

<p>3 Greater reference should be made to the background paper on related plans and strategies to show how the contents of these plans has been taken into consideration and has influenced options and choices.</p> <p>For example,</p> <ul style="list-style-type: none">• Whilst it is accepted that the draft North Wales Regional Transport Strategy and the Wales Transport Strategy are emerging they should be considered and potential conflicts should be avoided as far as possible.	<p>level strategies has influenced strategic policy and the choice of options for the plan.</p>
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C2 Consistency with national policy.	
Comments	Suggested Actions
<p>1 The strategy should have sufficient information on the principles of the approach to the key policy topics such as affordable housing to accompany proposed SPG. For example:</p> <ul style="list-style-type: none"> • Para 6.3.3 states that SPG will be produced on Listed Buildings. This would seem reasonable, but there would appear to be nothing in the background papers, including the SA/SEA, to indicate why SPG is necessary on this issue, but not in respect of other types of historic assets. E.g. for the protection and sustainable enhancement of the World Heritage Site which, together with the wider historic environment of the area, is a key environmental and economic asset. <p>2 There could be greater clarity/content to the spatial strategy diagrams/maps. The key diagram does not make clear to the public the areas of change re housing and the overall locational thrust of the preferred option.</p> <p>3 In terms of retail at least the retail sequential test, retail capacity and a functional hierarchy of centres should be considered or referred to at this stage.</p> <p>4 At this stage the definition of Welsh Language Sensitive Areas for the County should have been determined on the basis of locally appropriate criteria.</p> <p>5 It is essential to provide an affordable housing target as required by national policy. Para 3.4.7 Gypsy Sites – it is felt that this approach is too inflexible and not specific enough. Alternative strategic locations/sites should be identified so that if it is necessary to allocate a site then various options could be considered.</p>	<ul style="list-style-type: none"> • Reduce over reliance on SPG and ensure that all key tenets of local planning policy are contained in the LDP • Make clearer the implications of 'not repeating ' national policy, cross reference and indicate/justify where local variations is considered appropriate • Improve the spatial/locational content of the strategy • Review retail, Welsh language, housing and transport elements of the strategy.

<p>6 From a public transport perspective the concentration of development to support public transport is to be welcomed. However, further detail may be required to ensure concentration around public transport hubs while avoiding development near strategic junctions of the core trunk road network that encourages their use for short local trips. It would be expected there would be more evidence that the use of railways has been fully explored, as required by PPW (paragraph 8.5.4), even though it may emerge that improvements within the plan period are unrealistic. A similar examination of freight requirements is also advised.</p> <p>7 The omission of reference to Minerals Planning Policy Wales etc has an impact on the soundness of the Minerals section as a whole. In particular paragraph 5.4.7 refers to the forthcoming Regional Technical Statement for aggregates and assumes that it can be ignored because the LDP strategy has been produced first. This approach is unacceptable.</p>	<ul style="list-style-type: none">• Review minerals section and consider mentioning in the list of “Objectives”
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C3 Regard to the Wales Spatial Plan	
Comments	Suggested Actions
<p>1 There should be better synergy between the current WSP and the LDP priorities. For example, the preferred strategy under represents the potential strategic position of Llandudno, Llandudno Junction and Conwy as a hub and Llandudno as a regional service centre. There should be greater reference to associated implications of this for the choice of housing /population or other options</p> <p>2 The strategy should take account of the emerging NE Wales Sub-Regional Strategy, Conway & Denbighshire Study & the NW Wales Sub-Regional Strategy.</p>	<ul style="list-style-type: none"> • Review whether the WSP proposition regarding the strategic hub status of Llandudno etc and its retail, service and employment centre role serving a large hinterland (the latter is not mentioned in the review of plans or the retail section) is sufficiently reflected in the assessment of growth options, the choice of location strategy or the key policies. • Allow sufficient flexibility to be able to accommodate WSP area working.

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CE1 Setting out a coherent strategy from which policies and allocations logically flow and compatibility with plans prepared by neighbouring authorities	
Comments	Suggested Actions
<p>1 The plan strategy should flow from higher level plans, and from the Council’s own Community Strategy and its sustainability framework. The plan objectives established in this way should be seen to drive the identification of strategy/policy options, their evaluation and the monitoring framework in order to show there is an internal flow and coherence to the plan. Monitoring indicators should show what part of the preferred strategy they are intended to monitor and relate to what is really relevant to the delivery of the strategy.</p> <p>One example where this could be improved is that the preferred strategy makes a case for the provision of affordable housing as a main objective of the Plan (Objective 2). However the relationship between the provision of affordable housing and the overall level of growth could be explored in more detail within the submitted documents.</p> <p>2 The proposition that there is no need for key strategic sites amounts to a strategy and as such it should be made clear. It really needs to be considered as an option alongside the alternative of incremental smaller-scale growth.</p>	<ul style="list-style-type: none"> • Cross Referencing- Better cross-referencing to more detailed background technical papers, other documents and the evidence base would be helpful in demonstrating internal flow and coherence, etc. • Structure or introduce the plan to show how the preferred strategy flows from and relates to the community strategy vision, the key issues, the plan objectives and the SA. • The deposit plan should be based upon evidence that the relationship between the preferred level of growth and the provision of affordable housing has been considered, drawing upon evidence of need in Conwy • Include a better explanation/description of the physical and other relevant implications of the options and preferred strategy.

<p>3 The relationship between the various drivers of the plan could be more explicit in the options and the preferred strategy.</p>	<ul style="list-style-type: none">• Consider in more depth and report on the inter-linkages between subject areas to improve the coherence of the strategy.• Enhance the evidence base and the quality of the analysis in respect of key issues
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CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives, and are they founded on a robust and credible evidence base?	
Comments	Suggested Actions
<p>1 The evidence base for the strategy needs strengthening by:-</p> <ul style="list-style-type: none"> • The SA refers to the need for better regional and local assessment of employment land allocations/completions/take-up and the requirements of industry/developers generally and in specific locations. • Review of whether some employment allocations are still appropriate or whether there are better alternative uses, • A comparative analysis identifying how much employment growth has taken place on/off allocated employment sites in the past could y influence the choice of options. • Strategic analysis of candidate sites. • The implications of the urban capacity work could be made more transparent. <p>2 The strategy would benefit from greater depth and content. It should confirm the strategy direction for all of the relevant spatial elements needed to guide decisions on the detail of the deposit plan. Additional information/content/explanation/analysis would allow stakeholders and members of the public to appreciate the physical and other implications of the various options and the strategy.</p> <p>3 Strategic options should be considered as integrated scenarios which cover housing, employment, transport and other components. The analysis relating to the assessment of the growth options needs strengthening as does explanation of the inter-relationships between the preferred options. For example, housing and employment should not be seen as separate entities nor as independent of other drivers and forces for change. Relationships between housing growth and economic development, housing and retailing, housing and Welsh culture or housing numbers and affordable housing do not appear to have been addressed so far in any detail. There are similar issues in respect of the spatial links between the distribution of</p>	<ul style="list-style-type: none"> • Enhance the evidence base and the quality of the analysis in respect of key issues, including • Discussion with Technical Services Division of the Environment, Planning and Countryside Department regarding Agricultural Land Classification • Consider strategic flood risk assessment • Include a better explanation/description of the physical and other relevant implications of the options and preferred strategy. • Show clearly that the options and any preferred key allocations are realistic by improving the explanations of how they were generated, the interrelationships between them, their physical implications and the constraints on delivery.

housing and employment.

4 Some strategic issues could be pursued further and not left until later. For example 'key sites'; 'key areas of protection' in terms of green wedges; retail hierarchies; etc.

5 Strategic Locations and related issues:

- Options around the 'scale' of new site releases (eg economies of scale and benefit in terms of planning gain, social/physical infrastructure procurement, affordable housing, etc) could be explored and presented. Mixed use development and density might be considered as strategic issues.
- The preferred strategy report mentions accessibility and movement in terms of commuting and the preferred strategy proposes concentrating development along transport infrastructure and at urban hubs. It is not clear however what transport infrastructure is required to support this. There should be an explanation of how the schemes that are listed support the preferred strategy.
- It should be made clear how the Abergele by-pass relates to the preferred LDP strategy and how crucial its delivery is to the plan.

- Undertake candidate sites analysis

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CE 3 There are clear mechanisms for Implementation and Monitoring	
Comments	Suggested Actions
<p>1 The preferred strategy and associated policies should be expressed in terms which emphasise the <u>means and timescale</u> by which the objectives derived from the spatial vision will be delivered</p> <p>2 The indicators listed are not related to the plan objectives and in some cases do not seem to monitor what is really relevant to the delivery of the strategy.</p> <p>3 The Preferred Strategy contains proposals which do not appear to be monitored e.g. para 3.2.7 states that the plan will propose that the type and size of dwellings should reflect the diverse needs of the local communities, but there is no indication by way of a monitoring indicator, as to how this will be monitored.</p>	<ul style="list-style-type: none"> • Review the emphasis of the preferred strategy to focus on the means and timescales for delivering the plan vision/objectives. • Review the monitoring indicators and relate them to the plan objectives and strategy delivery and to the requirements in LDP Wales.

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CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
<p>1 The strategy should set out how it will address uncertainty and be responsive to changing circumstances. It should demonstrate sufficient flexibility to permit the county to grow and develop appropriately in the future. An allowance appears to have been made for expansion of the employment requirements but the restrictive approach to housing could have significant consequences, particularly for affordable housing.</p> <p>2 Minerals section 5.4: There is no stated intention to revisit the approach after the RTS is available.</p> <p>3 Work on site selection will need to demonstrate that the preferred strategy will deliver the stated accessibility aim and will cope with changes in transport infrastructure and service performance.</p>	<ul style="list-style-type: none"> • Consider whether the plan is sufficiently flexible to respond to economic, WSP and other changes including delivery risks. • Consider developing a trajectory setting out the key elements of delivery and their timescales for implementation. This should demonstrate how and when the different elements of supply will come on stream and how contingencies will be triggered in time to maintain continuity of supply and deal with uncertainties over emerging assessments. • Review minerals section