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

INTRODUCTION

This report sets out the changes that the Council considers it is necessary to make to the Sustainable Appraisal/Strategic Environmental Assessment Document following the public consultations held in March – April 2011.

The Sustainable Appraisal/Strategic Environmental Assessment Document was subject to public consultations which invited comments on all aspects of the document.

In addition to changes proposed in light of comments received, other changes to the document are also necessary to take account of new information not previously available. Minor editorial changes are also proposed to improve legibility or provide clarification. Collectively, the changes proposed in this report are referred to throughout as ‘focussed changes’.

Where a change proposes deleting text, this is shown by a ~~strike through~~.

Where a change proposes adding text, this is shown by **red text**.

The changes proposed are shown in the order they appear in the document. Paragraph numbers indicate the original number within the document; any new paragraphs have not yet been given a paragraph number but are shown in the order they will appear in the final adopted document.

Consultation on this document will start on **Friday 31st August 2012**. All comments must be received by the Conwy County Borough Council **no later than 4.45pm on Friday 12th October 2012**. **Comments in response to this consultation must relate only to the focussed changes being proposed and not to other areas of the document.**

The Council encourages comments to be made via their website: www.conwy.gov.uk/ldp

Alternatively comments can be made using the Focussed Changes comment form – copies are available at the following Conwy County Borough Council Offices between the hours of 8.45 a.m. – 5.15 p.m. Monday to Thursday and 8.45 a.m. – 4.45 p.m. Friday:

Planning Policy Officer, 26 Castle Street, Conwy LL32 8AY
Civic Offices, Colwyn Bay LL29 8AR
Bodlondeb, Conwy LL32 8DU

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Conwy County Borough Council Deposit Local Development Plan

Sustainability Appraisal – Schedule of Amendments

August 2012



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1 Matrix of changes to the Sustainability Report February 2011

Matrix of text changes (August 2012) to Sustainability Appraisal Report (Feb 2011)

Focused changes ref	Para no.	Text change	Notes/reasons for change
SAC001	1.1 NTS	This report is the non-technical summary of the combined sustainability appraisal (SA) and strategic environmental assessment, of the Deposit version of the Conwy County Borough Council Local Development Plan (LDP). The main SA report shows the appraisal findings in full, including focused changes to the LDP prior to Examination	Factual update
SAC002	2.7 NTS	SA of the initial Deposit LDP (April 2009, 2011 and 2012) The SA at these stages this stage assessed the sustainability implications of a full Deposit versions of the LPD. However, following the 2009 consultation process it was decided to revise the Deposit and therefore the SA. This The 2011 SA report is was largely the same as was prepared in 2009, although takes into account the changes. This stage of the SA updates the 2011 report in light of Focused Changes made to the LDP. Findings and recommendations of the SA are updated to take into account sustainability impacts of these changes.	Factual update
SAC003	4.5 NTS	The growth options have been revised from the 2011 Deposit LDP, with housing growth level reduced to 6,350 dwellings, with a contingency to take total housing growth to 6,985 dwellings. The growth options were revised again from the 2009 Deposit LDP to this version. A higher housing growth level had has been chosen of 6,800, with a contingency to take total housing growth to 7,900. The sustainability appraisal does identify some potential sustainability implications of the lower growth rate. These implications are that lower growth: <ul style="list-style-type: none"> • may not be able to meet affordable housing needs • may not be high enough to deliver the workforce necessary to achieve economic growth objectives, and therefore may encourage commuting. 	To match the changes made to policy HOU/1 in the revised 2012 Deposit LDP.
SAC004	5.7 NTS	The spatial distribution of development is supported by a policy that requires all sites to deliver a high proportion affordable house for local needs. This could have benefits in helping reverse the decline of rural communities and making sure young people can afford to remain in Conwy. However, the SA does note the need to make sure housing is coming forward for development to meet	To match the changes made to policy HOU/1 in the revised 2012 Deposit LDP.

		identified affordable housing requirements. With only 6,800 6,350 new homes to be built the target of 30% affordable homes for all new development needs to be rigorously applied to achieve this.	
SAC005	6.5 NTS	The SA also reviewed the housing allocations made in the LDP, using the Council's appraisal of sites as a basis. The Council's appraisal is useful in identifying potential constraints to development on the allocations. These should be followed up in the LDP by including a housing implementation that lists for each site the constraints and sensitivities and how developers will be expected to take these into account in the development proposals. This information is particularly important given the substantial revision of sites allocated for development between the 2009, 2010 and 2011 and 2010 Deposit versions of the LDP.	General amends due to refinement of SA appraisal.
SAC006	6.8 NTS	Contingency sites for housing: The SA welcomes the inclusion of monitoring to release contingency sites. identifies possible risks in the way contingency sites for housing are to be managed in the LPD. The LDP may need to provide Greater certainty has been provided in background paper 41 (August 2012) of what exactly the trigger points are would be for allowing these sites to be bought forward, although these should be outlined within the LDP itself. It is suggested that for sustainable development that these are only released in conjunction with meeting economic growth targets. Allowing their release for a more general desire to achieve the objectives of the plan may undermine the chosen LDP strategy. It may be hard to argue a case against developers who wish to bring these sites forward according to their own criteria.	Changes outlined for the monitoring and release of contingency sites are outlined in new supporting text and background paper 41 'Contingency' (August 2012).
SAC007	6.9	It will also be important to find a way of prioritising the release of contingency sites. The LDP needs to set criteria that will ensure the most sustainable sites are selected first.	Changes outlined for the monitoring and release of contingency sites are outlined in new supporting text and background paper 41 'Contingency' (August 2012).
SAC008	6.10 NTS	The SA also queried how decisions were made on the allocated sites being the most suitable, the Council's appraisal contained data gaps for some sites. It is essential that the Council can justify that the choice of allocations are compatible with sustainable development objectives. This includes being able to demonstrate that development of these allocations would not result in harm	Changes in response to updated appraisal of sites.

		to the natural and built environment, where comparable alternative sites are available.	
SAC009	6.11 NTS	The economic strategy: Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The strategy includes permitting around 20 15% of new employment development in the rural area, the SA notes that this type of development should only be given permission where it is of a scale suitable to this location, to avoid creating unsustainable travel patterns. However, there may be benefits for rural communities of supporting rural enterprise.	To match the changes made to policy DP/2 in the revised 2012 Deposit LDP.
SAC010	6.13 NTS	Contingency sites for employment: Managing the release of the additional 7 3.5ha of employment land may be undermined by the policy that allows non-allocated sites on the urban periphery to be developed. If additional sites are allowed to come forward preventing the contingency sites may not be possible, with may undermine the chosen strategy.	To match the changes made to policy EMP/1 and EMP/3 in the revised 2012 Deposit LDP.
SAC011	6.16 NTS	However, the SA makes some recommendations where improvements could be made to policies to help sustainability performance: <ul style="list-style-type: none"> • Retail policy could include a strategic sequential approach to delivering this type of development, favouring town centres, to help reduce car travel and out-of-town retailing that can adversely impact on viability of town and village shops. • Policies allowing some change of use in shopping centres may help ensure vacant units do not harm the character of these areas. However, it may be suitable to state which types of uses will and will not be permitted to help make sure these areas remain primarily for shopping. • To help protect community services there should be an additional policy to protect all existing community facilities, (e.g. community halls and leisure centres) from change of use, unless an alternative site can be found or they can be incorporated into the new development. 	Policy CFS/6 has changed from protecting 'a shop selling convenience goods' to a longer list of community facilities.
SAC012	6.20 NTS	Minerals and waste: The minerals policies clearly set out that no new hard rock quarries will be permitted in Conwy, although the operation of existing quarries should be protected. This will help reduce the potential impacts of	Policy MW/3 now includes Sand and Gravel resources.

		quarrying on people and the environment in the plan area. However, the SA notes that if the long-term demand for hard rock does not decrease, protecting the local environment could simply displace the impacts of quarrying elsewhere nationally or globally. This may also have an increased need for long distance transportation of rock, contrary to principles of sustainability. Policies on safeguarding sand and gravel sites should help reserve this mineral resource for future use.					
SAC013	1.6	Subsequently, an SA of the preferred strategy LDP consultation draft was carried out. The stage of SA now reached is the appraisal of the 2010 Deposit version of the LDP, updated to take into account changes prior to Examination in Public. This is the second time a Deposit version has been produced by the Council. A previous An initial version, prepared in 2009, was revoked following a need to review housing figures. This SA report follows closely the SA of the 2009 Deposit, updated to reflect the changes. - Background documents were produced by those preparing the LDP to indicate how the findings of the SA have, and will be taken on board in moving forward with the Strategy and preparation of the whole LDP ¹ .	Updated to take into account revised stage.				
SAC014	2.7	The purpose of this appraisal is to better inform decision makers on the sustainability aspects of the plan and ensure the implications of the plan on helping to achieve sustainable development are recognised. Planning consultants, Baker Associates who are now part of Peter Brett Associates, are carrying out SA as an independent exercise, with some input and provision of information from officers at Conwy County Borough Council	Factual amendment as Baker Associates are now part of Peter Brett Associates				
SAC015	Table at 2.5	<table border="1"> <thead> <tr> <th colspan="2">LDP Stage</th> </tr> </thead> <tbody> <tr> <td>Consultation on the LDP Preferred Strategy</td> <td>October/November 2006</td> </tr> </tbody> </table>	LDP Stage		Consultation on the LDP Preferred Strategy	October/November 2006	Updated to take into account revised timetable.
LDP Stage							
Consultation on the LDP Preferred Strategy	October/November 2006						

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

		<p>Consultation on the Deposit LDP April 2009</p> <p>Consultation on revised Deposit LDP February/March 2011</p> <p>Examination in Public August 2011 February/March 2013</p> <p>Adoption of the LDP March 2011 Summer 2013</p>	
SAC016	2.33	<p>SA of the Deposit LDP (2010-2011): This is the current version of the SA report. The majority of content remained the same as it was in the 2009 version and the aim of the report is the same. However, the report has been updated to take into account revised content of the LDP. Where necessary the change this has meant from the previous version is set out in the text.</p>	LDP been revised since 2010, and SA undertaken of this version of the LDP.
SAC017	New para 2.34	<p>Amendment of SA to take into Deposit LDP Focused Changes (2012): This is the current version of the SA report. It is an amendment to the previous SA taking into account the Focused Changes to the LDP prepared prior to Examination in Public.</p>	To explain how the changes at this stage of the SA fits into the overall SA process.
SAC018	7.6	<p>At the original The Deposit LDP stage in 2009 (and revised in 2010 and now in 2012) the options for growth were included in the plan that had not been previously part of Baker Associates SA at Preferred Strategy. Since the 2009 Deposit there has been considerable extra work on growth levels to reflect revised population statistics from Welsh Assembly Government. Subsequently, there have been further revisions to reflect additional work on population and household projections, as set out in the 2011 Population and Household. This work has involved external consultants reviewing the housing growth necessary to deliver development in a way that meets the economic growth objectives of the Council. Findings of this external review are recorded in an LDP background paper 'Population and Household Projections' (August 2012).</p>	To reflect the new amends to the LDP in 2012 and extra work completed on background paper 'Population and Household Projections' (August 2012).
SAC019	7.9	<p>The preferred approach is for 6,800 6,350 homes to be built in Conwy between 2007 and 2022. This works out at an average of 453 423 per year. The LDP identifies that in 2010 there are already 2224 1,063 homes that have planning permission by are not yet built and a further 968 that have been completed since 2007, where development can already proceed (because they have planning permission) or where development has already finished. The LDP can only have influence on the remaining two thirds of housing development.</p>	To reflect changes made in policy HOU1 and supporting background papers 4 'Housing Land Supply' (August 2012) and 2 'Population and Household Projections' (August 2012).

		This is about 4,600 4,300 homes, of which only 2520 2,327 will be allocated in the Deposit LDP and 1812 1463 on non-allocated 'windfall' sites and 509 from bringing empty homes back into use (figures from background paper Housing Land Supply (August 2012) table HOU1a).	
SAC020	7.10	The level of growth that the LDP needs to provide for has reduced slightly in the Further Changes to 423 per annum from the level proposed in the 2010 Deposit LDP of 453 new homes per annum. The figure is These figures are quite low for a borough of this size, but a bit higher than the completions in previous years.	To reflect changes made in policy HOU/1 and supporting background papers 4 'Housing Land Supply' (August 2012) and 2 'Population and Household Projections' (August 2012).
SAC021	7.11	The new Deposit plan LDP also now has contains an extra contingency figure, possibly allowing a further 1100 635 homes to be built over the plan period. This gives a total yield of 7,900 6,985 or 526 456 dwellings per annum. This is a considerable decrease from the 2010 proposed Deposit LDP, where a contingency of 1100 was allowed for. The Council will need to ensure that they have sufficient evidence to support the contingency figures and that they provide for a realistic level of development. How contingency sites will be used in covered by the sustainability appraisal in paragraphs xx to xx.	To reflect changes made in policy HOU/1 and supporting background papers 4 'Housing Land Supply' (August 2012) and 2 'Population and Household Projections' (August 2012).
SAC022	7.16	Looking at the actual level of growth being pursued, 453 423 new homes a year, some potential disadvantages issues can also be identified relating to meeting the future vision for the plan area. The plan Council needs to be confident that the housing requirement identified in the plan match the need for jobs for the existing population, as well reducing out-commuting. The plan is very strongly economically led, with a real push for the County Borough to improve its economic performance. This includes encouraging indigenous business growth and inward investment to create more jobs. However, to achieve this objective in a more sustainable way it employment must be matched by local housing.	To reflect changes made in policy HOU/1 and supporting background papers 4 'Housing Land Supply' (August 2012) and 2 'Population and Household Projections' (August 2012).
SAC023	7.17	The external review of housing growth, on the 2010 Deposit LDP, recommended adopting the higher growth rate of 7,900 homes for the plan in one go, without resort to contingency. This would have supported economic strategy for the borough. Despite revised household projections (background	To reflect changes made in policy HOU/1 and supporting background papers 4 'Housing Land Supply' (August 2012), 2 'Population and Household Projections' (August 2012) and 42

		<p>paper 2 'Population and Household Projection' (August 2012)), to create a sustainable strategy it is necessary to align The supply of housing and employment land need. to be aligned, This will also avoid avoiding unnecessary allocation of sites for either housing or employment.</p> <p>Sustainability implications of the chosen growth (6,800/6,350) are identified as:</p> <ul style="list-style-type: none"> • A lower housing number risks not meeting affordable housing needs in the County Borough, even if all sites achieve the 30% target • May Will not be sufficient to support provide for the forecast job increase of 310 jobs per year, with impacts on achieve economic goals or creating unsustainable patterns of growth • Likely to require less land for development and therefore help protect the natural environment. 	Employment Land Demand and Supply (August 2012).
SAC024	7.18	<p>If the plan sets the higher level of growth (7,900) from the outset it will may improve the chances of supply sufficient affordable homes to meet needs. It would could also better support supply enough housing to meet job growth targets. If suitable sites can be found in Conwy that preserve areas of high quality landscape, it may be suitable to pursue slightly higher levels of growth. This has the potential to provide social and economic benefits for Conwy.</p>	Revised to take into account changed housing figures.
SAC025	7.20	<p>The preferred growth level is above recent housing completion rates. The sustainability appraisal recommends that appropriate monitoring of housing completions and the take up of allocations is undertaken regularly throughout the plan period. As the LDP is pursuing the lower rates of housing allocation with a contingency it is vital that this is managed in a way that controls its release. The importance of managing contingency release is covered in paragraphs 9.46 to 9.58. Monitoring and review is needed so needs to be adjusted if housing is not coming forward as expected, or is coming forward at too quick a rate, so the LDP can be revised to make sure development is coming forward according to a sustainable spatial strategy.</p>	Change in reference to paragraph numbers and for clarification.
SAC026	7.24	<p>A note Background papers have has been prepared by the Council on the, 'Justification for the Removal of the Proposed Development Sites Detailed in the Deposit LDP, first in of April 2009 and then again in March 2011'. This</p>	To clarify that there has been a further revision of development sites as detailed in 'Justification for the Removal of the Proposed Development Sites

		appears as These are reported in Background Paper 35.	Detailed in the Deposit LDP of March 2011'.
SAC027	7.25	Between the 2009 Deposit Plan, the 2010 plan and the 2011 plan there have been a major reviews of allocations to identify a new set of sites for allocation. These reviews have been comprehensive, although it does raise a slight concern that the previous allocations were misleading. The Council needs to be confident it has a sound evidence base that demonstrates how preferred sites were selected from a number of alternatives. This will include the plan-makers sustainability assessment of all of the sites, which appears. It is hoped that the new site allocations are based on more sound evidence, and this does appear to be the base based on site review in Background Paper 21 – 'Site Deliverability' and Background Paper 35 'Justification for the Removal of the Proposed Development Sites.	To clarify that there has been a further revision of development sites as detailed in 'Justification for the Removal of the Proposed Development Sites Detailed in the Deposit LDP of March 2011'.
SAC028	7.26	The method of assessment of housing and employment sites for allocation in the 2011 Deposit plan, and previously for the 2010 Deposit plan, included several stages of sieving to a short list for detailed assessment. Background Paper 21 sets out the methodology and outputs of this assessment process. Despite not being part of the external SA undertaken by Baker Associates it is part of the sustainability appraisal process. Choosing the right sites is an intrinsic part of creating a more sustainable plan.	To clarify that there has been a further revision of development sites.
SAC029	7.30	The site selection process also allocates sites either to a timeframe within the plan period or identifies them as contingency sites. The majority of contingency sites appear to have been chosen as they are. Contingency sites are all greenfield rather than brownfield, that will prioritise previously developed land. However, no indication is given on the other criteria for making a site a contingency rather than an allocation, for instance based on the roles and functions of settlement and the need to prevent oversupply of development. It is important that contingency sites are chosen to meet the needs of individual settlements, rather than chosen for being greenfield rather than brownfield selection processes. However, the exact process for making these sites 'contingency' is not given.	To clarify that there has been a further revision of development sites.
SAC030	7.33	Monitoring, and a review strategy, for both housing land take up and	To ensure that employment development is

		employment land take up may will be necessary to support sustainable commuting patterns. The reason for this is that if there is an oversupply of employment this could lead to an increase in commuting from surrounding local authority area to Conwy County Borough. Or, if there was an oversupply of housing this could lead to an increase in commuting from Conwy County Borough to surrounding local authority areas. and an undersupply could lead to increased out-commuting from Conwy County Borough. This is Either situation is undesirable, particularly where the only realistic travel option is by car.	matched with housing development over the time period of the plan.
SAC031	New para	The sites allocated for development have changed quite substantially several times during LDP preparation. The Council will need to make sure the evidence that supports the choices made is sound, including the selection of preferred sites from alternatives based in part on sustainability issues. Furthermore, the selection of sites and contingency sites could acknowledge in more detail how these fit with the role, function and needs of each sub-area.	
SAC032	7.34	The quantity of allocated housing and employment land is queried by the sustainability appraisal, and if this is compatible with seeking joined up patterns of development that fulfil the aims of the plan. The LDP is economically led with a strong push for economic growth in the County Borough. However, background studies do indicate that the 6800 new homes may not be sufficient to fulfil estimated job growth. The implications of this could be increased need to travel, incompatible with sustainable development.	Covered by paragraph 7.33.
SAC033	7.35	Background studies also show that 6800 the lower level of new homes, identified for the plan period, may not meet the affordable housing needs in the County Borough. This will have sustainability implications for communities and the local workforce, potentially exacerbated if there is a mismatch of jobs to new homes.	Housing need for plan period has changed to 6,350 and background study still relevant to this reduction in housing need.
SAC034	8.7	This greater clarity of approach could help avoid the current duplication of policy parts that currently appear in the LDP. Examples of where the LDP could benefit from some simplification are in the strategy policy (DP/2) and the housing policy (HOU/1), and again in HOU/1 and the affordable housing policy (HOU/2). These policies and their supporting text repeat the same issues, each in slightly different ways. This duplication could impede understanding of	Additional text has been added to HOU/1, which now repeats policy HOU/2 'Affordable Housing for Local Need.

		the strategy and hinder delivery of development as it is intended by potential providing conflicting advice. It would be preferable to have one clear policy on the strategy and then a further policy on affordable housing.	
SAC035	9.4	The preferred strategy for the Conwy LDP is to focus the majority of new development in the Urban Development Strategy Area (UDSA), made up of all of the coastal towns from Kinmel Bay to Llanfairfechan, as well as the rural town of Llanrwst. The strategy is for 90% 85% of housing and 80% of employment development to be directed to the urban area, these towns will also be the focus for new retail development.	To reflect changes in policy DC/2 'Overarching Strategic Approach'.
SAC036	9.8	This rural/urban split for housing is broken down further using a settlement hierarchy based on the sustainability of settlements, and the grouping of the larger towns into functional units.	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas).
SAC037	9.9	The urban development area, there are was is split into five units or functional areas. These are: <ul style="list-style-type: none"> • Llandudno, Llandudno Junction and Conwy • Abergele, Towyn and Kinmel Bay • Llanfairfechan and Penmaenmawr • Colwyn Bay and Mochre • Llanrwst 	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas).
SAC038	9.10	The table accompanying HOU1 Table HOU1a of the Deposit LDP breaks down housing growth for the County Borough into these five areas. Table 9.1 uses this the data in HOU1a (not including empty homes and school modernisation figures as these are not spatially apportioned) to give an idea of how the allocations of the LDP would change the proportion of development any settlement would receive.	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas).
SAC039	9.11	Column 2 shows the distribution of the total housing development in Conwy that is likely to occur without the influence of the spatial distribution strategy, including development from completions, permissions and windfall. This is similar to a business as usual approach. Column 1 includes the allocations.	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas).

		The difference between the two columns shows the influence the LDP allocations could have on the distribution of housing development.	
SAC040	9.15	The sustainability of this approach is not clear, as there are already many unimplemented permissions in several areas. This is shown in Column 3 where the proportion of development from new allocations in some areas is very low and in others very high. In some areas there are already a large proportion of the homes committed or constructed. For instance, almost half of those in the 'Conwy' area are completed or have permission (with only three years of the plan period past). It will be essential to make sure that this housing is delivered, in order to implement the chosen strategy. And that a high level of uncompleted commitments does not indicate that the market in an area has stagnated as development is no longer financially viable, risking implementation of the plan. It is vital to have monitoring and review systems in place to help make sure the LDP is implementing the spatial strategy set out in objectives. Monitoring is also essential to manage release of contingency sites.	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas).
SAC041	9.16	What is not clear, and a matter raised as part of the previous appraisal of the Preferred Strategy, is the reasoning behind the spatial distribution of allocations, shown in table 9.1 (and HOU1 of the LDP). The LDP appears to treat the UDSA as a single unit, with allocations distributed to available sites within it, regardless of their location. For instance, it is not clear in the spatial strategy the purpose of the proposed distribution. For instance, is high growth in Abergele intended to meet and existing shortfall, to deliver regeneration or to support economic policy, or is it simply because land is available.	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas) and for clarification.
SAC042	New para after 9.16	It is important that the housing growth distributed across the Borough is distributed to meet the needs of each functional area, to ensure the objectives for individual area are met. This includes ensuring that the right level of housing and employment is directed to different functional areas within the Borough to meet specific needs in those locations. Development needs to be delivered that is compatible with principles of sustainable development, such as creating good places to live and reducing car reliance. Therefore, the Council needs to be confident that the level and distribution of development is will improve access to locations which are near jobs, schools, community	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas) and updated policy HOU/1 'Meeting the Housing Need'.

		services and shops and deliver other benefits such supporting town centres.									
SAC042	New para after 9.16	In providing the right levels of housing to the right location, the advantages include: <ul style="list-style-type: none"> • providing housing to match employment need; • minimising commuting for work; • improving access to schools, community services and shops 	The revised LDP does not split out the Urban Development Strategy Area into lower tier settlement groups (functional areas) and updated policy HOU/1 'Meeting the Housing Need'.								
SAC043	New para after 9.16	In addition, the strategy does not make clear how new development will be delivered in a way that supports creation of sustainable communities. For instance, allocated growth for Abergele is substantial meaning it is essential that this growth is matched by an increase in local services, such as schools, shops and public transport. However, the LDP is not clear on how it will secure the delivery of a mix of uses as part of larger development sites. This will need to be achieved through implementation of appropriate policy or putting in place design briefs for larger development sites, this is elaborated on in paragraph 10.34.	New paragraph to reflect substantial housing growth expected in some towns.								
SAC044	Deleted 9.17	To avoid this situation the LDP strategy should include more detail on how this housing distribution works to meet the specific needs of each of the area. For example: <ul style="list-style-type: none"> • regeneration and renewal of towns • environmental constraints • employment focus. 	Deleted to take to avoid repetition.								
SAC045	Table 9.1	<table border="1"> <tr> <td colspan="4">Proportion of housing to each area:</td> </tr> <tr> <td></td> <td>Column 1: committed, windfall and allocations (total for borough 6304</td> <td>Column 2: committed and windfall development (total for</td> <td>Column 3: proportion of total that are new allocations for each strategy</td> </tr> </table>	Proportion of housing to each area:					Column 1: committed, windfall and allocations (total for borough 6304	Column 2: committed and windfall development (total for	Column 3: proportion of total that are new allocations for each strategy	The revised LDP includes changes to the allocations.
Proportion of housing to each area:											
	Column 1: committed, windfall and allocations (total for borough 6304	Column 2: committed and windfall development (total for	Column 3: proportion of total that are new allocations for each strategy								

			5821)	borough 3784 3494)	area		
		Llandudno, Llandudno Junction and Conwy	27.3% 29.0%	38.3% 39.0%	49% 19.7%		
		Abergele, Towyn and Kinmel Bay	17.9% 19.5%	7.7% 9.5%	15.7% 70.6%		
		Llanfairfechan and Penmaenmawr	9.8% 5.8%	8.3% 8.1%	23.5% 15.8%		
		Colwyn Bay and Mochre	23.3% 26.0%	38.3% 39.0%	73.9% 34.4%		
		Llanrwst	4.3% 5.1%	3.1% 2.7%	56% 67.7%		
		Rural	17.5% 14.6%	12.9% 14.7%	55.9% 47.7%		
SAC046	9.18	<p>The quantity of development that remains to be allocated through the LDP is under half of the overall housing numbers. From a total of 6304 6,350 homes, as identified in background paper 4 'Housing Land Supply' (August 2012), (this does not include empty homes or schools modernisation) in table HOU1a approximately 35.3 32% is already completed or has a planning permission, 28.8 34.2% is anticipated to come forward as 'windfall', and 40 33.8% from allocations. This shows that, based on the Council's figures, there is only a relatively limited opportunity for the allocation of sites through the LDP to influence the spatial strategy.</p>				<p>The housing requirement and relevant breakdown has changed since the last SA of the LDP, taken from policy HOU/1 'Meeting the Housing Need' and table 10 in background paper 4 'Housing Land Supply'.</p>	
SAC047	9.19	<p>Committed development: A review of existing commitments of housing since the 2009 version of the LDP has resulted in a reduction of the overall quantity of housing identified from these sources. In the 2009 version three of the five urban sub-areas more development is expected from committed and completed development than remained to be delivered through windfall or</p>				<p>Changes to the previous housing delivery since the last draft LDP.</p>	

		allocations. However In most of the sub-areas there are in the revised version all areas have more windfall and allocations than completions and commitments, as would be expected as there are still over 10 years remaining in the plan period. However, there are exceptions including is the 'Conwy' area where the levels from the two sources are quite similar, despite figures only be from the first 3 years of the plan period already elapsed .	
SAC048	9.21	'Windfall' development: The other constraint in pursuing a very different strategy is the quantity of homes that are expected to come forward on non-allocated windfall sites. This is just under a quarter of the whole housing supply (of 6304 6,350 homes). The actual number of homes from this source has increased approximately three twofold from the 2009 Deposit LDP. Windfall sources have now been included for the villages and rural area, and six five times as much in the Conwy UDSA.	Changes to the previous housing delivery since the last draft LDP.
SAC049	New para after 9.24	Empty Homes Strategy The proportion of development that is expected to come forward from empty homes has increased in the Focused Changes LDP. This source of housing supply is sustainable, making use of existing buildings and therefore demand for additional land and resources. However, as with other issues on the reliability of evidence the Council will need to be sure this is a reliable source of supply and these homes being brought back into use to achieve a net gain. It is not clear if this source of housing would lead to a double counting of housing figures as will already be accounted for and therefore should not go toward meeting overall housing requirements set for the borough.	Updated to reflect rise in reliance on Empty Homes as part of housing delivery.
SAC050	9.25	Around 80 85% of new employment development is anticipated in the UDSA. This approach is compatible with locating development in sustainable areas, where there is good access by a variety of types of transport. Twenty percent Fifteen percent of employment development is directed towards the Rural Development Strategy Area. New employment will need to be supported through the extension of public transport, walking and cycling routes, to make sure new jobs are accessible to all.	To reflect revised policy DP/2 'Overarching Strategic Approach'.
SAC051	9.27	The total allocation employment land requirement including contingency adds up to 54 39.5ha of employment land or over 6,720 4,565 jobs. This is a	Changes in employment policies and background papers 42 'Employment Land Demand and

		substantial allocation amount of land if need is based on past rates of employment development then that would only require 24ha would be needed over the plan period. Even with no contingency, 47 11.5 ha of employment land is being newly allocated in the urban area (with a further 3.1 in rural locations). A sustainability benefit of a higher employment allocation than may be needed is it does allow some flexibility in the market. This means that investors have a choice of site to meet their specific needs, ranging from small rural sites to large industrial parks, this Letting investors choose where the locate, including rural allocations may help secure economic investment.	Supply' and 2 'Population and Household Projections'. Also, some change to improve clarity of wording.
SAC052	New para after 9.27	Between the 2011 Deposit plan and the revised plan the number of jobs to be delivered up to 2022 has greatly reduced, from 6,720 to 4,565. The Sustainability Appraisal is unable to comment on whether the right number has been chosen for the Borough. However, the Council need to be confident that the right number of jobs has been derived, to match the housing growth for the area and reduce out-commuting from Conwy Borough.	Comments provided on the reduced number of jobs that will be created between versions of the plan, to reflect, changes in employment policies and background papers 42 'Employment Land Demand and Supply' and 2 'Population and Household Projections'.
SAC053	9.29	One of the greatest changes to the employment allocations policies is the quantity of employment land that is allocated for development, as well as the way the allocation has been split. The reduction in the allocation, from the in the 2010 Deposit from the 2009 Deposit to the current levels is supported by the appraisal as helping to create a more sustainable place. The 2009 approach allocated so much land that it may have been difficult to control its delivery in way that is compatible with creating more self-contained places that make best use of previously developed land.	To reflect another stage of revising the LDP.
SAC054	9.31	The use of contingency sites is also queried with seven 3.5 additional hectares available for development. How employment contingency land is released is assessed in paragraph 9.46-9.58 of this section.	To reflect the reduction of employment contingency presented in policy EMP/1 'Meeting B1, B2 & B8 Office and Industrial Employment Needs' and background paper 2 'Population and Household Projections'.
SAC055	9.32	The greatest proportion of new development is allocated, or has been constructed or committed, in the Llandudno UDSA. In this area there are around 10 5.6ha of new allocations in addition an existing 17.9ha . Around Abergele and Kinmel Bay is another area with a high proportion of employment focus. There are 8.5 7.5 ha of new allocation here and 2 existing. Some sites in	Changes in employment allocation in specific places, as set out in background paper 42 'Employment Land Demand and Supply'.

		this area have been vacant for a long time perhaps indicating little demand for sites of this type. Making these sites deliverable will be an important part of securing the desired spatial strategy.	
SAC056	9.37	The strategy states that around 20 15% of all new employment development will be in rural locations. This, alongside the AHLN policy, could help support rural enterprise and jobs to meet local needs away from coastal Conwy.	To reflect the reduction of employment directed to rural locations.
SAC057	9.39	The strategy seeks to deliver around a large number of affordable homes for local need (AHLN) over the plan period (85% in the UDSA and 15% in the Rural Development Strategy Area (RDSA)). The strategy set out in DP/2, HOU/1 and HOU/2 shows how this is to be achieved through requiring a proportion of development on each site to be AHLN. 30% of all housing must be delivered as AHLN or through financial contribution. In rural villages from Tier 2 Main Villages, Tier 1 Villages, Minor Villages and Hamlets and smaller 100% of new homes are intended to be AHLN. However, the policy provides a caveat for developers to provide market housing where it is deemed essential to assist the delivery of affordable housing and should be supported by the completion of a Viability Assessment Pro Forma.	Policies relating to affordable housing now include extra criteria allowing for market housing if a site is not viable for 100% affordable housing.
SAC058	9.40	Even if the 30% requirement is secured in all new housing this will only deliver 2,040 1,905 affordable homes, or 2,370 2,095 if all contingency sites are delivered. Background Paper 37 on the revised growth figures suggests the higher yield is necessary to help meet housing needs. The Joint Local Housing Market Assessment provides a general view that the Conwy County-wide affordable dwellings requirements are far greater than those identified in the plan.	Reduction in provision of affordable homes in the 2012 Deposit plan compared to the last version in 2011.
SAC059	New para after 9.41	However, as stated in paragraph 9.39, the revised affordable housing policies now contain a caveat to introduce market housing where 100% affordable housing is not viable on schemes within rural locations, where the policy requires 100% affordable housing. The Sustainability Appraisal appreciates that there are times when sites may not be viable, but this should be assessed on a site by site basis. The policy should remain strongly worded to retain a requirement of 100% affordable homes in rural locations and the caveat	Policies relating to affordable housing now include extra criteria allowing for market housing if a site is not viable for 100% affordable housing

		removed from policy wording. The wording instead be placed in supporting text to provide in exceptional circumstances when market housing could also be accepted.	
SAC060	9.42	Detail on the process of working out need and the viability of delivery is in Background Papers 7 and 9. The viability assessment has shown delivery of these sites will be possible, and if the LDP is successful in achieving maximising the delivery of this quantity of AHLN it could have major benefits for local communities. Social sustainability benefits could include making it possible for families to remain in rural areas, and help protect the viability and vitality of villages by providing a social and demographic mix of residents. This will help counteract the decline of some rural areas that results from an aging population of long-term residents, retirees and second homes that can be empty much of the year, and young people priced out of housing. It could also help provide a local workforce to protect the rural economy.	Background Papers 7 and 9 now not relevant to the new sites identified in the revised 2012 Deposit LDP.
SAC061	9.48	However, there are also sites phased as 'contingency' to come forward if other land is required for development. Contingency is for: <ul style="list-style-type: none"> 1,100 665 extra homes on 17 10 additional identified sites (bringing total to 7,900), as set out in background paper 41 'Contingency' (August 2012). However, the overall contingency number to match the housing requirement, as set out in policy HOU/1 is 635 extra homes. 7ha additional employment land on two sites. 	The number of contingency homes has reduced and therefore the number of sites has reduced too. The number of extra homes differs between what is set out in the policy HOU/1 and in background paper 41 'Contingency' (August).
SAC062	9.49	The LDP strategy is very strongly employment led, with the Council wishing to improve the economy of the area by encouraging new job growth. A strong economy is part of delivering sustainable development by ensuring the long-term financial security of residents and the social benefits that come from employment. To achieve this aim is essential that employment growth is matched to housing growth in any area. Therefore, contingency release if targets are not being met may be suitable in achieving sustainable growth.	To take into account the reduced job targets and employment land allocations.
SAC063	9.51	The background paper 37 on further growth options identifies that housing sites should only be released when identified trigger points have been reached and it can be shown that employment objectives are not being met. Such situations could include:	To reflect the changes in releasing housing contingency sites, as outlined in background paper 41 'Contingency' (August 2012).

		<ul style="list-style-type: none"> the current allocations of the Deposit are not coming forward for development and economic growth is stalling sites could be bought forward if employment growth has been rapid and sites are becoming scarce. 	
SAC064	9.52	LDP policy nor the monitoring framework set out these tests for the release of housing land. Instead of this type of test the supporting text (section 3.10) for contingency release allows a more flexible approach to allowing this type of site to be developed.	
SAC065	9.53	The text contains more than the economic reasons for release of additional land, and includes release of new housing sites if other objectives are not being met. Unless these other objectives, such as affordable housing or more homes for younger people are clearly defined implementing these as the indicators to trigger release will not be possible. For instance, even with all new housing development the LDP can not meet the AHLN need, therefore making release of contingency sites inevitable.	To reflect the changes in releasing housing contingency sites, as outlined in background paper 41 'Contingency' (August 2012).
SAC066	9.54	Without a clear basis for the contingency arrangement the plan may be open to the argument that more development should be allowed because the provision has been 'used up' with the rate of housing completions exceeding the plan supply, or because some sites included in the plan are demonstrated to be undeliverable. This will work counter to the chosen spatial strategy.	To reflect the changes in releasing housing contingency sites, as outlined in background paper 41 'Contingency' (August 2012).
SAC067	9.55	Despite the plan stating that contingency sites will be bought forward according to the monitoring strategy and through review in the Annual Monitoring Report (AMR). However, these lack the detail necessary to fully justify and control individual site's release.	To reflect the changes in releasing housing contingency sites, as outlined in background paper 41 'Contingency' (August 2012).

SAC069	Replace para 9.51 to 9.55	<p>The background paper 41 (August 2012) on contingency identifies that housing sites should only be released when identified a trigger point have been reached and it can be shown that housing objectives are not being met. The trigger point includes</p> <ul style="list-style-type: none"> • that annual housing completions over 3 consecutive year period are consistently 15% or more above or below the annual housing requirement; and • the Council is unable to achieve a five year housing land supply, the Council will release a site. <p>The Sustainability Appraisal agrees that there should be a way to monitor when contingency sites should come forward. Relating the trigger point to the five year land supply means it provides a clear basis for the contingency arrangement and release of sites.</p> <p>It is important that criteria is set out to justify which sites are released, in terms of the location, capacity and deliverability of the contingency sites at the time of considering releasing sites for development. Where there is under-provision sites need to be in the right location and priority should be given to where housing is more needed and not coming forward. The site needs to be able to provide the right number and type of housing for that location, as well as be deliverable within the anticipated time period.</p> <p>Similarly, where sites need to be bought forward to match demand the choice of sites needs to managed to ensure they are in a right location to support sustainable patterns of growth, especially as some site are quite large will need to deliver development that supports sustainable communities and accessible services.</p> <p>More detailed criteria on site release (including location) are set out within background paper 41 (August 2012). However, it might be more helpful to future developers if the triggers for contingency site release are set out in the supporting text within the LDP.</p>	To reflect the changes in releasing housing contingency sites, as outlined in background paper 41 'Contingency' (August 2012).
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SAC070	Moved para 9.58 to after 9.55	It is essential that the way that these contingency sites are bought forward for development is made clear in the LDP. This is required so that they can be managed in a way that does not undermine the chosen spatial strategy and risk meeting sustainable development objectives. In addition, it will be part of providing a sound plan.	
SAC071	9.56	For employment, a further difficulty to achieving the sustainable spatial distribution that plan is aiming for is that the plan allows for new peripheral employment sites on the edges of the UDSA urban areas. It is not clear how these sites will be justified for development if the contingency sites are not. Owners of the contingency sites may be able to legitimately bring their sites forward in this way, potentially undermining the spatial strategy and delivery of sustainable development.	To reflect the changes in releasing employment contingency sites, as outlined in background paper 41 'Contingency' (August 2012).
SAC072	New para 9.56	The background paper 41 (August 2012) on contingency states that the two identified employment sites, one in Abergele (UDSA) and one in Dwygyfylchi (rural location). The background paper 41 (August 2012) on contingency states that the two employment sites should only be released when a trigger point have been reached and it can be shown that employment objectives are not being met. The trigger is when the annual rate of employment land take-up is less than 1.5ha per annum or greater than 10 hectares per annum for 2 or more consecutive years. In terms of the sustainable release of sites it would appear that the criteria is suitable to control release of sites. However, the trigger would mean that it is likely that these sites will need to be delivered over the plan period, especially in the current low growth economic climate.	To reflect the changes in releasing employment contingency sites, as outlined in background paper 41 'Contingency' (August 2012).
SAC073	9.57	<i>Prioritising contingency</i> Following the identification that a site needs to be released for contingency purpose there also needs to be a method by which sites are prioritised. For instance will decisions be purely made on the location of development or will other factors play a part, such as: <ul style="list-style-type: none"> ● size of site ● sustainability of the site in terms of access 	Covered in new sections above relating to contingency sites.

		<ul style="list-style-type: none"> ● proximity of the site to trigger employment location ● viability of the site for a high proportion of affordable housing. <p>It is essential that the way that these contingency sites are bought forward for development is made clear in the LDP. This is required so that they can be managed in a way that does not undermine the chosen spatial strategy and risk meeting sustainable development objectives. In addition, it will be part of providing a sound plan.</p>	
SAC074	10.17	The SA supports the strong approach the plan takes to delivering Affordable Housing for Local Needs (AHLN), and this includes the use of exception sites outside rural areas. However, making sure the policy is clear will aid in delivery this type of housing, as would clarification of issues through an AHLN SPG.	To reflect that affordable housing policies now contain a caveat for allowing market housing to make affordable housing viable in rural locations.
SAC075	New para after 10.17	<p>However, as stated in previous sections, the revised affordable housing policies HOU/1 and HOU/2 now contain caveats to introduce market housing where 100% affordable housing is not viable on schemes within rural locations. The caveat should be removed from policy wording, to enable the policy to remain strong and maximise the number of affordable homes in rural locations.</p> <p>Similarly, the affordable housing targets in policies should be worded positively, setting a target quantity (30%) that would be expected from development. It is then should be up to the developer in discussion with the Council to establish a lower level if financial viability is an issue, without the need to caveat it in policy. If necessary, caveats could be included in supporting text. Policies should also avoid precluding development achieving more than 30% affordable if this is what the developer want, for instance developments by Housing Associations.</p>	To reflect that affordable housing policies now contain a caveat for allowing market housing to make affordable housing viable in rural locations.
SAC076	10.19	The review of the allocations has resulted in some substantial changes to the allocated sites from the 2009 Deposit to the 2010 Deposit, and then again to 2012. Many of the sites allocated in the 2009 and 2010 version of the Deposit have been removed and new ones allocated. Some discussion of this is shown in Chapter 9.	Changes have occurred in which sites are allocated from one version of the LDP to another from 2009 to 2012.

SAC077	10.22	The revised Deposit allocations are backed up by a new review of candidate sites and set out in Background Paper 21 – ‘Site Deliverability’ and Background Paper 35 – Justification for the Removal of the Proposed Development Sites Detailed in the Revised Deposit LDP of March 2011. The new site allocations, following their thorough assessment, should have greater certainty of coming forward for development than the previous set, and the set before that. The review of sites identifies how the site fits into a sequential test and the possible constraints that need to be overcome for delivery. This method integrates elements of sustainable development into site selection, and subject to controls over delivery may help in delivering more sustainable development.	More allocated sites, through this further revision of the LDP, have been deleted, amended or included.
SAC078	10.27	Biodiversity: several of the sites are identified as having the potential to have an adverse impact on biodiversity. This includes sites in Kinmel Bay, Old Colwyn, Colwyn Bay and Towyn and rural sites at Llanddulas. It is noted in the Habitats Regulations Assessment for the LDP that development off Derwen Lane, Penrhyn Bay has the potential to impact on the Creuddyn Peninsula Woodland area – and this is not picked up in the site appraisal. Several sites, such as those around Llanrwst may support bats further study on implications of development is necessary. The LDP needs to demonstrate that it has fully taken into account potential impacts on these nature conservation sites, or put in place policies to make sure delivery does not harm these sites. Habitats Regulations Assessments should ensure there is no significant harm to European Nature Conservation sites.	Allocated sites, through this further revision of the LDP, have been deleted, amended or included.
SAC079	10.28	Historic environment: a site at Top Llan Road, Glan Conwy is identified as potentially having an adverse impact on a listed building, how this will be managed as part of delivery is not addressed. At Smithy Hill, Llanfair TH there is also the potential for archaeological remains that need to be assessed prior to any development. The site at Penmaen Road, Conwy is in proximity of the World Heritage Site, the design and layout of new development would have to respect this setting.	New site allocation included in focused changes document.
SAC080	10.29	Accessibility: the site appraisals show that all of the allocated sites have good access to at least a minimum level of services, and this includes shops, GPs, school, employment as well as access to higher quality centres by public	New site allocated include in focused changes.

		transport or cycle. Access to services is a key consideration of site suitability. The allocated site in rural locations, such as site 'North of Llansannan' may have inherent accessibility issues, with only a limited range of local services and jobs.	
SAC081	10.35	The strategy should help to contribute to delivering sustainable economic growth in the plan area. The strategy is to focus employment growth in the urban development strategy area, with an anticipated 80% 85% of new employment development here, and 20% 15% in the rural area.	Changes in the strategic distribution of employment land, as outlined in policy DC/2 'Overarching Strategic Approach'.
SAC082	10.47	The policies also seek to protect the character of existing shopping zones, although in some circumstances allowing change of use if it will not harm the viability of centres. To aid this approach it may be suitable to specify what types of development are not permitted in these shopping areas. Policy CFS/6 aims to protect local shops, post offices, petrol stations, village/church halls and public houses from change of use, this type of policy is important in retaining the services necessary to support viable local communities and reduce the distance people travel for essential goods. It may be suitable to widen this out to help protect other local services, including community centres, pubs and post offices.	Change in policy CFS/6 'Safeguarding of Community Facilities Outside the Sub-Regional Centre and the Town Centres, to include other community facilities other than local shops.
SAC083	10.50	The policies do not address other types of community facility, such as community halls, and leisure facilities. There needs to be suitable policies in place to help the avoid the loss of existing sites, and delivery of new sites community developments as part of supporting sustainable local communities. This will include the use of developer contributions in delivering this type of development.	Change in policy CFS/6 'Safeguarding of Community Facilities Outside the Sub-Regional Centre and the Town Centres, to include other community facilities other than local shops.
SAC084	10.54	This section of the Deposit LDP also covers the need to use natural resources efficiently in new development. This is an essential component of delivering sustainable development, as the quantity of development anticipated to be delivered through the LDP has the potential to require significant resource use, in construction and operation. The policies of the LDP cover these issues and should help more sustainable development. For instance, the policy includes a stepped approach to delivering more sustainable homes under the Code for Sustainable Homes. Some additional requirements could help further secure	Changes to policy NTE/7 'Energy Efficiency and Renewable Technologies in New Development'. Energy criteria deleted and Code for Sustainable Homes reduced to Level 3.

		sustainable construction, including the need to show how developers will be expected to show compliance on matters relating to energy and water use and sustainable construction.	
SAC085	10.67	Policy STR/5 lists specific projects that the LDP will help to implement by allocating land. Several of these are for improved public transport and cycling routes and their inclusion should help deliver these schemes, essential as part of the overall objective of reducing car use. New road proposals are less positive from a sustainability point of view, as they can lead to increased car use and have negative social and environmental impacts. The development of Llanwrst bypass is a decision that will be made at national level. However, the Council will need to make sure it is satisfied that the programme of road building and any detailed site proposals undergo appropriate environmental impact assessments.	Change to policy STR/5 'Integrated Sustainable Transport System' to include new road proposal at Llanwrst.
SAC086	13.8	The spatial distribution of development is supported by a policy that requires all sites deliver a high proportion affordable house for local needs. This could have benefits in helping reverse the decline of rural communities and making sure young people can afford to remain in Conwy. However, the SA does note the need to make sure housing is coming forward for development to meet identified affordable housing requirements. With only 6,800 6,350 new homes to be built the target of 30% affordable homes for all new development needs to be rigorously applied to achieve this.	To match the changes made to policy HOU/1 in the revised 2012 Deposit LDP.
SAC087	13.19	The SA also queried how decisions were made on the allocated sites being the most suitable, the Council's appraisal contained data gaps for some sites . It is essential that the Council can justify that the choice of allocations are compatible with sustainable development objectives. This includes being able to demonstrate that development of these allocations would not result in harm to the natural and built environment, where comparable alternative sites are available. This information is particularly important given the substantial revision of sites allocated for development between the 2009, and 2010 and 2011 Deposit version of the LDP.	To reflect the new revision of the LDP.
SAC088	13.22	Contingency sites for housing: The SA welcomes the inclusion of monitoring	Changes outlined for the monitoring and release

		<p>to release contingency sites. identifies possible risks in the way contingency sites for housing are to be managed in the LPD. The LDP may need to provide Greater certainty has been provided in background paper 41 (August 2012) of what exactly the trigger points are would be for allowing these sites to be bought forward, although these should be outlined within the LDP itself. It is suggested that for sustainable development that these are only released in conjunction with meeting economic growth targets. Allowing their release for a more general desire to achieve the objectives of the plan may undermine the chosen LDP strategy. It may be hard to argue a case against developers who wish to bring these sites forward according to their own criteria.</p>	<p>of contingency sites are outlined in new supporting text and background paper 41 'Contingency' (August 2012).</p>
SAC089	13.23	<p>It will also be important to find a way of prioritising the release of contingency sites. The LDP needs to set criteria that will ensure the most sustainable sites are selected first.</p>	<p>Changes outlined for the monitoring and release of contingency sites are outlined in new supporting text and background paper 41 'Contingency' (August 2012).</p>
SAC090	13.24	<p>The economic strategy: Strategic issues of housing delivery are addressed in the appraisal of the spatial strategy. The strategy includes permitting around 20 15% of new employment development in the rural area, the SA notes that this type of development should only be given permission where it is of a scale suitable to this location, to avoid creating unsustainable travel patterns. However, there may be benefits for rural communities of supporting rural enterprise.</p>	<p>To reflect changes in policy DC/2 'Overarching Strategic Approach'.</p>
SAC091	13.26	<p>Contingency sites for employment: Managing the release of the additional 7 3.5ha of employment land may be undermined by the policy that allows non-allocated sites on the urban periphery to be developed. If additional sites are allowed to come forward preventing the contingency sites may not be possible, with may undermine the chosen strategy.</p>	<p>To match the changes made to policy EMP/1 and EMP/3 in the revised 2012 Deposit LDP.</p>
SAC 092	13.29	<p>However, the SA makes some recommendations where improvements could be made to policies to help sustainability performance:</p> <ul style="list-style-type: none"> • Retail policy could include a strategic sequential approach to delivering this type of development, favouring town centres, to help reduce car travel and out-of-town retailing that can adversely impact on viability of town and village shops. 	<p>Policy CFS/6 has changed from protecting 'a shop selling convenience goods' to a longer list of community facilities.</p>

		<ul style="list-style-type: none"> • Policies allowing some change of use in shopping centres may help ensure vacant units do not harm the character of these areas. However, it may be suitable to state which types of uses will and will not be permitted to help make sure these areas remain primarily for shopping. • To help protect community services there should be an additional policy to protect all existing community facilities, (e.g. community halls and leisure centres) from change of use, unless an alternative site can be found or they can be incorporated into the new development. 	
SAC093	13.33	<p>Minerals and waste: The minerals policies clearly set out that no new hard rock quarries will be permitted in Conwy, although the operation of existing quarries should be protected. This will help reduce the potential impacts of quarrying on people and the environment in the plan area. However, the SA notes that if the long-term demand for hard rock does not decrease, protecting the local environment could simply displace the impacts of quarrying elsewhere nationally or globally. This may also have an increased need for long distance transportation of rock, contrary to principles of sustainability. Policies on safeguarding sand and gravel sites should help reserve this mineral resource for future use.</p>	Policy MW/3 now includes Sand and Gravel resources.

2 Amended policy Appraisal Matrices from Appendix 1 of the Sustainability Report February 2011

Policy DP/2															
Overarching strategic approach															
This policy sets the overall spatial strategy for Conwy, focusing on what type of development will be permitted in and around the town and villages (sorted into a hierarchy). The policy contains no development quantities, although it does show proportions.															
SP1	SP2	SP3	SP4	EP1	EP2	EP3	EP4	NR1	NR2	NR3	NR4	NR5	EC1	EC2	EC3
•	•	?	•	?	?	?	?	-	•	-	?	-	-	?	?
Sustainability commentary and significant impacts															
<p>This is the main strategic policy that sets out how growth will be distributed around Conwy. This clearly indicates that the focus will be in, and on the periphery of, the main urban areas.</p> <p>This overall approach is broadly compatible with sustainable development, as it is these town locations that are likely to be the most sustainable in terms of access to jobs, services and essential day-to-day needs. The principle way this will help in delivering sustainable development is to help control, and ideally reduce the need to travel by car now and setting patterns of development for the future. There is also the opportunity for new development associated with existing urban areas to contribute to the regeneration of these towns.</p> <p>The main split of development between larger and smaller settlements (90:10 for housing and 80:20 for employment land) is compatible with helping focus development in urban locations, supporting accessibility of services and jobs and also protect the countryside from development.</p> <p>The policy does break down the development between the 'main towns', instead treating these as a whole. Other policies of the plan do increase the detailed breakdown of development types in each location. However, it would be useful to see this as part of the strategy. The purpose of which is to show what the roles are of the individual settlements, revealing the location that has chosen to be focus of development in Conwy. This may be particularly significant when it comes to the roles of the coastal locations, against rural towns, such as Llanwrst, where the issues faced and opportunities for development are very different. For example, the difficulties of securing employment growth in the rural towns, due to distance from the main road, may mean a different, or lower growth strategy is suitable for these areas. This is so as not to exacerbate any imbalance in where people live to where they work, or to encourage the continued movement of young people out of the area to find work.</p> <p>It should also be clearly stated, that with the exception of Affordable Housing for Local Needs (AHLN) at Llanwrst, no development is permitted outside settlement boundaries. This is clearly implied by the policy it is never made explicit.</p> <p>For the main villages policy wording again could be simplified to improve understanding, with the current policy mixing spatial objectives with policy requirements. Again the policy is stating that in all Tier 1 villages new development should be within the development boundaries, with the exception of AHLN, this should be made explicit. For Tier 2 villages development is all for AHLN and therefore development is also permitted outside the development boundaries – so long as it's of an appropriate scale to the village.</p> <p>AHLN development will be permitted in minor villages.</p> <p>Provision of AHLN should help to support local communities, helping young people remain in their local area and it is hoped maintaining these as viable villages. However, it should be ensured that this policy does not create pockets of deprivation in settlements that have few or no local services, and rely on car trips to meet all day-to-day needs. AHLN issues are returned to in policy HOU/2.</p> <p>It may be possible to improve the policy, and therefore make it more readily apparent what the strategy for development is, by simple clarifying the wording and avoiding unnecessary sections. For instance stating that the settlement boundaries will re-drawn, as this is demonstrated already in proposals maps. Also, some of the policy criteria within DP/2, relating to affordable housing, repeats policy criteria within policy HOU/2.</p> <p>It is also noted that there are caveats to this policy where development would be permitted in the countryside, although the strategy does not refer to these. Examples include new tourism related accommodation and attractions, conversions, and agricultural workers homes.</p>															

Recommendations including mitigation:

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

Policy HOU/1

Meeting housing needs

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

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

Sustainability commentary and significant impacts

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

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

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

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

A sustainable spatial strategy includes details of why the pattern of development has been chosen. This includes identifying a clear spatial strategy at the outset, based on the needs and opportunities in individual towns and villages, such as redressing employment or housing imbalance, regeneration or improving access, and then allocating sites to address these. **The research paper BP/21 does indicate sites were chosen based on their suitability and sustainability, but the** LDP is not entirely clear on the reasoning behind the strategy. For instance, do the allocations simply relate to available land, rather than follow a more strategic ‘roles and function’ approach. Such an approach may have been particularly beneficial in the inland rural areas, where some villages could have been the focus for larger amounts of growth to support thriving local economies.

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

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

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

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

Recommendations including mitigation:

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

Implications of policy revisions

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

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

Policy HOU/2

Affordable housing for local need

This policy sets the affordable housing targets for development in Conwy. This includes the variable targets for different types of site.

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

Sustainability commentary and significant impacts

The delivery of Affordable Housing from Local Needs (AHLN) has the potential to have sustainability benefits for Conwy. This will be providing homes that support local people and communities, thereby lowering the proportion of new homes that bought as second homes or people retiring to the area. This can help support the culture and character of rural villages and support businesses in the area by providing a demographically and socially mixed workforce.

There is the slight risk that this policy could stifle overall housing growth in Conwy if AHLN levels are set too high and deter developers. Also, achieving some aspects of economic growth and success in Conwy may be reliant on providing sufficient open market homes to meet the needs of employers and their workforce.

The policy as drafted is ambitious and progressive in its approach, requiring AHLN provision (through contribution on very small sites) in all new housing development. Evidence on viability is essential to progress the policy through LDP preparation and secure delivery, and this is covered in an LDP Background Paper.

The 30% target is likely to be realistic based on financial viability. However, the policy must be

rigorously applied to ensure opportunities for delivering AHLN are not lost. It may be possible to implement variable targets in different areas, for instance locations where the market is strong and returns are higher achieving greater than 30% may be possible. **The exception clause, which currently appears in the policy weakens it and would be better suited within supporting text. Financial viability issues will always be a consideration of delivery of AHLN and this need not be set out in policy. The aim should always be to enter negotiation with developers to achieve the target the Council has set, even if this has to be reduced following discussion to achieve delivery.**

As with other policies there is some repetition of the detail of this policy with DP2 and HOU/1, and as previously mentioned the sustainability appraisal suggests making policies more clearly by restructuring them. Policies should also avoid unnecessary detail that would only duplicate the provisions of other national or local policy. For example, **limits on exception sites around Trefriw would be covered by other policy on natural environmental protection, and similarly** point 'v' on development in the open countryside.

It is notable that existing permissions are contributing very little to delivering affordable housing, as they are based on old policy. Therefore, it is essential for development management staff to have the right training and tools to successfully negotiate the high levels of affordable housing need on new permissions.

Recommendations including mitigation:

- **The policy needs to clear and positively worded so as to maximise the number of affordable housing coming forward during the Plan period, in all locations.**
- AHLN Supplementary Planning Guidance should be prepared, giving details on how these sites will be delivered, including:
 - securing use in the long-term
 - mix of social rented to intermediate housing
 - how affordable homes will be integrated into market housing
 - managing developer contributions on small sites for delivery of affordable housing by the Council.
- A SPG on developer obligations will help make clear to developers what financial contributions they will be expected to make, including AHLN. This could help clarify how negotiations on contributions would take place, and how decisions on priorities will be made if based on financial viability
- Higher targets could be sought in locations with a stronger market, or targets could be raised later in the plan period when the economic situation has improved and the housing market is more buoyant
- **Some elements of the policy are more suited to the main strategic housing policy, such as the size of windfall sites.**
- **Some elements of the policy are more suited to the supporting text, such as any reference to where market dwellings may be permitted in exceptional circumstances, if 100% affordable housing is not viable. This will strengthen the policy, but at the same time still provide explanation to when the policy can be negotiated with a developer.**
- The need for the proportion of AHLN on each site to be based on a strong evidence base in order to be able to successfully negotiate delivery and support the policy in Public Examination
- Training for development control staff may be needed to ensure that they can successfully negotiate with developers for the high level of affordable housing provision needed under this policy, which is a significant step-change from UDP policy
- Policy wording could be changed to indicate that 100% AHLN may be possible 'directly adjoining' Llanwrst and Main Villages (as is the case for Minor Villages), rather than 'outside' these villages.

Implications of policy revisions

The targets for AHLN have been reduced from 50% in a previous deposit to 30%, and requirements for small sites have been relaxed. Previously the SA did support a high AHLN provision but did raise concerns over viability of 50% in the current market, and if policy might slow the delivery of all types of homes. In particular, those settlements where the reasoned justification stated that housing provision

has been slow in the recent years, for example in Llanfairfechan and Penmaenmawr. Setting high affordable housing targets also could adversely impact on delivering other sustainability benefits through developer contributions.

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

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

Policy HOU/9

Meeting the Site Need for a Gypsies, Travellers and Travelling Showpeople

The policy is split into 2 sections. The first indicates that the Council will allocate a site for the needs for Gypsies, Travellers and Travelling Showpeople. The second section provides criteria relating to where and how the site will be permitted for development.

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

Sustainability commentary and significant impacts

The Council are assessing the need for Gypsies, Travellers and Travelling Showpeople sites which will be completed after the policy is adopted. While the policy does provide for the provision of pitches in the County, it only provides for one site across the area for all Gypsies, Travellers and Travelling Showpeople, who can have very different needs relating to site. The needs of each of these groups should be assessed and provided for on specific sites. This may result in one site, but could potentially result in a number of smaller sites, therefore the policy needs to respond to the needs of all of these groups.

The policy does provide criteria against which the site will be assessed, which ensures that the site is suitably located and provides access to key services and facilities. However, it does not apply to unallocated sites and there appears to be no policy criteria at all for unallocated Gypsies, Travellers and Travelling Showpeople sites.

Recommendations including mitigation:

- The needs of each of these groups should be assessed and provided for on specific sites. This may result in one site, but could potentially result in a number of smaller sites, therefore the policy needs to respond to the needs of all of these groups. The policy should be more flexible to allow for potentially more than one site.
- Policy criteria for permitting a site should cover both allocated and unallocated Gypsies, Travellers and Travelling Showpeople. In fact, it is probably more important to provide criteria for unallocated sites as the allocated site will be identified and assessed by the Council and LDP process, whereas unallocated sites will be identified through the planning application process, which will require stringent policy criteria.

Policy HOU/9

Meeting the site need for Gypsies and Travellers

The policy sets criteria for delivery of new pitch sites for Gypsy and Travellers in the County Borough.

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

Sustainability commentary and significant impacts

There is a requirement for Council's to provide sites to meet the needs of Gypsies and Traveller communities in the area. Providing permanent sites, as well as temporary or transit sites is essential to support these communities. Legal sites are essential to provide security to these communities and access to essential local education and health services.

The best way to deliver sustainable and secure sites is through allocation in the LDP. Finding sites through a rigorous appraisal of all options can help identify those that limit adverse impacts to the

natural environment, as well as providing the greatest benefits to future residents.

Recommendations including mitigation:

- Following completion of the local needs assessment it may be suitable to review the policy and allocate sites. This will need to take into account the differing needs of individual Gypsy and Traveller communities and the type and scale of site that may be needed.
- Criteria (h) needs to be carefully applied so as to avoid unwarranted hostile objection to legitimate and suitable pitch sites.

Implications of policy revisions

The previous version of the policy stated that a site would be allocated following Local Market Assessment. The SA identified that a single site may not be suitable given the differing cultural needs of Gypsy and Traveller communities, and more information will be needed on the source of need prior to any allocation.

Policy HOU/12

Re-use and Adaptation of Redundant Rural Buildings for Residential Use

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

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

Sustainability commentary and significant impacts

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

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

Recommendations including mitigation:

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

Policy EMP/1**Meeting the B1, B2 & B8 office and industrial employment needs**

This policy sets out the overall strategy for delivering employment development in Conwy, including the split between the urban and the rural areas.

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

Sustainability commentary and significant impacts

This policy sets out the employment land **requirement across the borough allocations** (committed and new sites) and a contingency for the plan period.

The policy splits the housing land allocation into two parts – the anticipated employment land requirements from an increasing population, and the employment land requirements needed to reduce out-commuting for work. In terms of achieving more sustainable development reducing commuting is strongly supported. This can help reduce emissions from transport as well as helping people gain employment local to where they live, helping create more sustainable communities. However, this is dependent on matching the locations of new jobs to housing areas, as simply reducing out-commuting will not necessarily reduce the length of trips people make to work – for instance in Kimmell Bay.

The LDP does not make clear what the distinction is between the two types of housing allocation, for instance no site allocation is identified as a ‘reduce commuting’ site or a ‘population change’ site. The type of employment and allocation of sites is likely to always provide jobs for part of each category. This means in practice for a clearer more legible employment strategy the two types should be combined. This will create an overall land allocation of **47.36ha** of employment land (with a contingency of **7.35ha**).

This policy repeats some spatial elements of the DP/2 policy and other policies of this section, providing an introduction to the employment development in the area but not necessarily any additional policy requirements. However, the strategy of focused employment should be positive on creating more sustainable patterns of development.

A large quantity of If employment **allocations are** is located on greenfield sites, **it** ~~will~~ **will** have inevitable adverse impacts on protecting open land. There may also be adverse impacts on biodiversity and landscape and impacts will need to be managed to effectively reduce these as much as it possible. Other impacts may come from the loss of agricultural land and changes in water drainage patterns.

Recommendations including mitigation:

- Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction
- Employment development should be delivered at levels to match housing growth local to each area, in order to create sustainable travel patterns
- Consideration could be given to deleting this policy and integrating elements in other policies of the strategy and employment chapter (much is already covered)
- Understanding of the policy could be improved by combining the two types of employment allocation (out-commuting and population change)

Implications of policy revisions

One of the The greatest changes to the policy is **the quantity of employment land that is allocated for development, as well as** the way the **employment requirement allocation** has been split. Contingency sites also have been included to be bought forward if necessary within the plan period. The reduction in the **employment requirement allocation** is supported in helping create a more sustainable place. The former approach allocated so much land that it may have been difficult to control its delivery in way that is compatible with creating more self-contained places that make best use of previously developed land. **However, the previous version of the Deposit Plan identified as need for only 24ha of employment land based on existing land take-up rates, meaning that the 47ha allocation is still well above requirements.**

Policy EMP/2

Site allocations to Allocation of new meet B1, B2 and B8 office and industrial employment sites demand and free stock levels

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

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

Sustainability commentary and significant impacts

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

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

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

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

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

The way that contingency sites will be bought forward **for development is not made clear in this policy. These sites need to be released only** when identified trigger points have been reached and it can be shown that employment objectives are not being met. Such situations **could** include:

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

Where either situation arises to achieve sustainable patterns of development and create functioning local neighbourhoods it must be made sure that employment growth is being phased with housing growth and community infrastructure provision. A clear strategy for releasing contingency sites is essential to be able to control their release. Without structured policy guidance developers could push for early release of sites working against what is identified as the spatial strategy for the County Borough.

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

The sustainability appraisal queries the part 3 of this policy that allows new employment development adjacent to the main built up areas. The choice of sites for employment allocation beyond urban boundaries has been based on a thorough review of available sites, leading to the identification of

those that are best able to implement the spatial strategy. Allowing development that has not been through these process may undermine this approach and lead to the development of less suitable sites. For help implement the spatial strategy and achieve more sustainable development not allowing development of this type of site may be preferable, alternatively making criteria 3b stronger to not allow such development if there are existing undeveloped greenfield employment allocations.

Recommendations including mitigation:

- Policies will need to be in place, nationally or locally, to mitigate against the potential impact of this level of employment development, including protection of the natural and built environment, good quality built design and sustainable construction
- The policy needs to be made more understandable, currently it is difficult to tell what the overall strategy for employment is, and how decisions on an application coming forward on an unallocated, or phased allocated site, would be made
- The way contingency sites will be released and prioritised needs to be made clear in planning policy to control their delivery and make clear to developers that early applications will be refused.
- Consider revising part 3 for managing planning applications for large non-allocated employment sites on greenfield sites on the urban periphery.

Implications of policy revisions

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

The revised policy now contains has removed the criteria on how permitting development of non-allocated employment proposals, which was previously quite permissive of this type of development potentially undermining the spatial strategy. will be managed.

Policy EMP/3

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

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

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

Sustainability commentary and significant impacts

This policies permits non-allocated sites to come forward for employment, thereby ensuring that employment land is delivered. It required proposals to demonstrate that the proposal could not be accommodated on land allocated. This evidence needs to be robust to ensure that the identified strategy is delivered, thereby delivering housing and employment in the most sustainable locations. One of the principle ways that a development plan can influence long-term sustainable development is by locating new employment near places that are easily accessible for where people live now (and is planned in the future). This helps make sustainable patterns of growth where there is good access to employment without the need to travel by car.

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

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

Recommendations including mitigation:

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

Implications of policy revisions

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

Policy EMP/43

Safeguarding Existing B1, B2 & B8 Office and Industrial Sites Employment Land

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

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

Sustainability commentary and significant impacts

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

The policy requires the applicant to demonstrate there would be no significant impact on the overall supply of employment land and premises if a development would lead to the loss of existing and committed employment land or premises. Again, this is a good approach to protecting employment land. However there does not appear to be any guidance or supporting text relating to what evidence is required from applicants to demonstrate this later criteria in the policy, or what is viewed as 'significant' when the Council will be assessing planning applications on the impact of employment land and premises in the County.

Recommendations including mitigation:

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

Implications of policy revisions

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

Policy EMP/5

Office and Industrial Employment Improvement Areas

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

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

Sustainability commentary and significant impacts

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

Recommendations including mitigation:

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

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

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

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

Sustainability commentary and significant impacts

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

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

Recommendations including mitigation:

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

Policy CFS/6**Safeguarding of Community Facilities ~~Shops Selling Convenience Goods~~ Outside Llandudno, Colwyn Bay and District Centres**

The policy provides for the retention of convenience shops, ~~post offices, petrol stations, village/church halls and public houses~~ outside the main settlement centres. Where a loss of ~~a shop~~ **one of these facilities** will be permitted the applicant is required to provide evidence that the building is no longer viable.

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

Sustainability commentary and significant impacts

Retaining ~~convenience shops~~ community facilities in neighbourhoods, villages and rural locations promotes access to facilities for communities that live in more remote locations, and helps people to remain living in their local area.

Evidence is required from the applicant where they apply to change the use of a ~~convenience shop~~ **community facility** to another use. Requirements relating to the evidence are outlined in the supporting text, stating that it should be clearly demonstrated that the ~~shop~~ **community facility** is not viable for a minimum of 12 months at a realistic price and that there is no community need for the ~~shop~~ **community facility**. This allows for change of use, but also ensures that where possible these key community facilities are retained.

Recommendations including mitigation:

- This is a positive policy which seeks to retain ~~convenience shop~~ **community facility** in less sustainable locations than the key retail centres of Conwy.

Implications of policy revisions

~~The policy in the Focused Changes version includes all types of facilities that should be protected, previously it was only shops. This is positive change in meeting sustainability objectives relating to community and wellbeing.~~

Policy CFS/10**New Allotments**

The policy allocates ~~4~~ **5** new allotment sites in the County.

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

Sustainability commentary and significant impacts

Providing new allotments is a positive approach as allotments provide an important community facility as a recreational activity and provide locally grown food which helps to improve health and well-being, as well as providing biodiversity benefits.

~~Revised Background Paper (BP) 25 'Allotment Site Demand and Supply Report' (August 2012) explains why previously considered sites are now not listed within policy, because they were not deliverable. The Paper now lists 5 new sites and considers the deliverability of each site.~~

Recommendations including mitigation:

- Providing new allotments is a benefit to the community and potential biodiversity which is a positive approach.
- There are 2 policies in the LDP for allotments. It could be possible to merge the 2 policies to reduce the number of policies in the Plan.
- ~~Sites allocated, within the LDP, for allotment use should be deliverable.~~

Implications of policy revisions

~~The allocated sites for allotments have changed since the previous version of the Deposit. Any allotment allocation needs to be backed up by certainty of its delivery, including funding sources. All five of the allotments allocated in the Focused Changes LDP are new, replace four previous~~

allocations. The towns/villages in which allotment allocations are made have also changed for instance no allocation in Rhos on Sea and new allocation in Abergele. It is therefore not clear if allotments are allocated to meet identified demand or just in available locations.

Policy CFS/11

Development and Open Space

The policy sets out the requirement of new housing development make on site provision for open space, including amenity and play space. It does allow for a commuted sum to be provided instead, but only in exceptional and justified circumstances or sites of less than 30 new homes.

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

Sustainability commentary and significant impacts

These policies provide a sound basis for providing new play space, amenity and outdoor sports facilities for new residential development. This will ensure that key open space facilities support the local community and are provided within new developments, or a commuted sum is provided where it may be more appropriate to provide the facility elsewhere.

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

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

It may be more beneficial in some communities to have a supply of larger play areas and / or sports facilities. In these circumstances a commuted sum may be a better suited situation in order to deliver these large facilities. This obviously would depend on the local circumstances and deficiencies identified in the forthcoming Open Space Audit and Assessment, and any assessments completed relating to sport pitch facilities.

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

Recommendations including mitigation:

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

Implications of policy revisions

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

Policy CFS/13**New open space allocations**

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

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

Sustainability commentary and significant impacts

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

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

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

Recommendations including mitigation:

- Additional open space allocations need to be made throughout the plan area.
- The type of open space provided should meet local needs and existing shortfalls.
- The impact on landscape and nature conservation of converting semi-natural areas to managed open space should be recognised and sites planned accordingly.
- The allocation of new open space should meet identified needs.

Implications of policy revisions

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

Policy CFS/14**New burial ground**

A new Two new burial grounds are is allocated at Llanwrst and Penmaenmawr.

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

Sustainability commentary and significant impacts

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

Recommendations including mitigation:

- None

Implications of policy revisions

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

Policy NTE/5**The Landscape and Protecting Special Landscape Character Areas**

The policy seeks to protect the local landscape character of the County and individual Special Landscape Areas Landscape Character Areas.

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

Sustainability commentary and significant impacts

Protecting and enhancing landscape character is important in Conwy which is a mainly rural County. The policy is a positive approach to providing development within the landscape, which should provide development well designed within the landscape. It should also help to implement policy DP/3 Promoting Design Quality and Reducing Crime.

The policy and supporting text, however, is not locally distinctive to Conwy and outlines and could read from any County from Wales. This restricts indicating to potential applicants where the most distinctive and unique landscapes exist in the County. Basing the landscape protection areas on work done nationally as part of Landmap should help protection those areas highest quality within Conwy County Borough.

The policy mainly relates to the measures that development that development proposed in Special Landscape Area will have to comply with. This includes requirements for landscape character assessments in 'appropriate cases'. However, the plan is not clear when this will be required and how 'appropriate cases' will be determined. Furthermore, the policy gives little detail on how landscape character should be protected outside the Special Landscape Areas, with the exception of a statement that proposals must be considered against other policies.

Recommendations including mitigation:

- It would be beneficial if the policy provided criteria which protected landscapes outside Special Landscape Areas from development impacts.
- Reference to other policies is unnecessary as all development proposals would have to take into account all relevant policies of the plan.
- and/or the supporting text was more locally distinctive, to provide a strategic overview of the most unique and distinctive landscapes that can be found in Conwy. This potential could be a brief paragraph in the supporting text outlining any landscape designations such as National Park borders and AONBs, or other distinctive landscapes such as coastal areas.

Policy NTE/7**Energy Efficiency and Renewable Technologies in New Development**

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

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

Sustainability commentary and significant impacts

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

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

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

Recommendations including mitigation:

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

Implications of policy revisions

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

Policy NTE/8**Onshore wind turbine development**

The policy sets the principles for on-shore wind turbine development covering large scale turbines inside the SSA, and small scale wind farms outside the SSA. of greater and less than 5MW and those within and outside the SSA.

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

Sustainability commentary and significant impacts

The identification of SSA in Wales should mean that turbines in these locations can be relatively fast tracked for development as there is already agreement in principle that the site is suitable. To meet Wales targets for renewable energy generation it is essential that this type of development is not subject to unnecessary delay in delivery, taking into account the national and international benefits of these schemes in comparison to local concerns, particularly related to visual quality. The policy criteria appear appropriate to avoid the adverse impacts of these types of scheme, although there may be a need to define thresholds for cumulative impacts.

Consideration should also be given to single larger turbines to provide decentralised energy for large new development schemes, including residential development or in large industrial/employment development. The role of other low carbon and renewable energy generation should also be considered.

Under this policy, small scale wind turbines should will be permitted for development for residential, employment and commercial development. This will contribute to reducing carbon emissions, but must should not have any significant landscape impact.

Recommendations including mitigation:

- Defining cumulative impact thresholds may help prevent this type of impact.
- ~~Policy on small wind turbines should cover all types of development, not just dwellings.~~
- There is no policy on other types of low carbon or renewable energy technology. Policy should cover how this type of development would be addressed. This will include the need to incorporate decentralised heat and/or power networks into new development. This can either be part of the development of large allocations, or groups of allocations or as part of development co-location. Low carbon energy generation is strongly promoted through national WAG policy.

Implications of policy revisions

This is a new policy and should help control the delivery of this type of development so as not to harm the natural environment yet help secure delivery of on-shore wind turbines. The policy was revised for accuracy when updated to the Focused Changes version.

Policy CTH/5**Communities and The Welsh Language**

The policy requires a **language Mitigation Statement**, **Community Linguistic Statement** and/or a language impact assessment from proposals which are likely to have a significant effect on the Welsh language.

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

Sustainability commentary and significant impacts

The intention of this policy is to help retain local people in the community who speak Welsh. It requests evidence is provided of applicants for proposals which effect the Welsh language within a language statement or language impact assessment.

This policy does go some way to meet the sustainability objective of protecting and enhancing the cultural heritage of Conwy. However, restricting development due to effects on the Welsh language may have a negative effect on other sustainability objectives, such as restricting new people to an area may restrict encouraging investment and new businesses and jobs into the area.

The policy does ~~not~~ make specific requirements of development itself, in relation to protecting the Welsh Language. ~~In fact, it is unclear what types of development could effect the Welsh language. By not providing clear~~ **It does provide** guidance on what types of development would affect the Welsh language., it is difficult to see how applicants will know when they are supposed to consider the Welsh language and therefore submit a language statement or language impact assessment However, the Sustainability Appraisal recognises that it may be difficult to implement this policy **and what it may mean in practice. For instance if it will restrict economic or housing growth that would have had benefits for local communities and the economy.**

Furthermore, the supporting text does not provide any further details or guidance on what is expected within a language statement or language impact assessment.

Recommendations including mitigation:

- Although it is extremely important to encourage the Welsh language within communities, it is unclear from the policy how development can affect the Welsh language. Therefore there are no recommendations for this policy.

Implications of policy revisions

The Focused Changes version of the LDP includes more detail how the policy will be implemented.

Policy MSW/3**Safeguarding rock reserves and sand and gravel resources**

This policy is intended to ensure the existing hard rock and sand and gravel quarries and supporting infrastructure are safeguarded, from inappropriate development and sterilisation.

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

Sustainability commentary and significant impacts

Supporting the protection of the buildings and infrastructure on which these quarries depend, including the rail and water freight facilities, is essential to their continued operation.

Recommendations including mitigation:

- No recommendations

Implications of policy revisions

The policy gives more detail on the type of development that may be permitted, adding clarity to the policy and therefore not creating an unnecessary restriction on some types of development.

Implications of policy revisions

The policy gives more detail on the type of development that may be permitted, adding clarity to the policy and therefore not creating an unnecessary restriction on some types of development.

Policy MSW/9**Safeguarding existing waste facilities**

This policy seeks to make sure that land already in use for waste management remains in this use.

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

Sustainability commentary and significant impacts

Providing facilities for the more sustainable management of waste can help reduce the waste of primary resources by making better use of waste. Protecting these sites should help to retain these facilities that provide for some of the local waste management needs in Conwy.

Recommendations including mitigation:

- This policy could be combined with others in this section, in particular MWS/7

Policy STR/5**Integrated sustainable transport system**

This policy sets out where land will be safeguarded for new transport infrastructure

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

Sustainability commentary and significant impacts

This policy sets out the transport projects to be delivered in Conwy. These include some projects related to public transport and improved walking and cycling, and the sustainability appraisal welcomes the inclusion of these infrastructure improvements in the LDP. Reducing travel by car through improving the attractiveness and safety of alternatives can have a variety of sustainability benefits, including more equitable access, lower carbon emissions, and improved air quality.

The road improvements can also have sustainability benefits in particular related to economic benefits from quicker travel times. However, it should be noted that increasing road capacity will not be a long-term solution to reducing congestion and new roads encourage car use, and in the end congestion reaches current levels. Increased car use can also have a range of adverse sustainability impacts, including on air quality, health and climate change.

Although road building is not compatible with the majority of objectives for sustainable development, it is noted that WAG has sought the inclusion of safeguarding land for Llanwrst by-pass. Decision making on the development of this road will be made at a national level and not by the County Borough Council. However, the Council will need to make sure that any strategic road schemes and specific proposals are subject to environmental assessment as appropriate.

Recommendations including mitigation:

- It may be suitable to set out in policy which of these schemes would be in part funded from developer contributions
- The sustainability appraisal would support the delivery of infrastructure to improve public transport access, walking and cycling as a priority to road building

Implications of policy revisions

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

3 Amended Monitoring Indicators Appendix 4 of the Sustainability Report February 2011

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

		<p>open space in line with Policy CFS/11 and LDP4 'Planning Obligations'.</p> <ul style="list-style-type: none"> • Number of developments of less than 30 dwellings which make provision for a commuted sum for open space in line with Policy CFS/11 and LDP4 'Planning Obligations' • Net loss of open space • Applications approved for new areas of open space in locations across the plan area.
Housing	<ul style="list-style-type: none"> • Ensure all have access to good quality housing to meet their needs, including affordable housing for local needs 	<ul style="list-style-type: none"> • Annual Building Rate. Number of net additional affordable and general market dwellings built per annum. • 5 year housing land supply • Annual construction of affordable housing • The number of new housing developments not achieving 100% affordable housing provision in the Rural Development Strategy Area. • The number of housing schemes developing housing types and sizes against the evidence set out in the Local Market Assessment and/or Social/Affordable Housing Registers • % of affordable housing delivery on Council owned sites • Number of vacant dwellings brought back into use • Annual construction Amount of affordable housing delivered permitted via 'exception sites'.
Effective Protection of the Environment		
Biodiversity	<ul style="list-style-type: none"> • To maintain and enhance the diversity and abundance of indigenous species in the plan area 	<ul style="list-style-type: none"> • Permissions granted for development having which is considered to have a negative impact on an LBAP (full list) species/habitats. • Development adversely affecting a RIG granted permission against Officer or local archaeological organisation recommendations. • Applications granted permission which result in the loss of land within an SPA, SAC or SSSI • Applications granted permission against Officer or CCW advice considered to have potential to cause harm to a protected site or species • Any negative effect highlighted by a statutory body relating to a degradation of a water body within a European site as a result of Conwy LDP promoted development. • Any negative effect caused in a neighbouring authority area brought to the attention of

		a statutory body thought to be caused by a development or Policy in the Conwy LDP.
Landscape character	<ul style="list-style-type: none"> Ensure special and distinctive, semi-natural and historic landscapes and their specific features are conserved and enhanced 	<ul style="list-style-type: none"> Applications granted permission against Officer recommendations where a detrimental impact on an LCA SLA had been identified.
Built environment	<ul style="list-style-type: none"> Conserve and enhance the existing built form and design, and ensure new developments are built to high design standards 	<ul style="list-style-type: none"> Number of planning applications approved not in accordance with the relevant SPG (i.e. Design SPG) or Planning Brief Number of buildings or structures within a conservation area, deemed to be making a positive contribution, which are demolished. Percentage Number of relevant applications granted resulting in the shop front making a positive contribution to having a negative impact on the area.
Cultural heritage	<ul style="list-style-type: none"> Conserve and enhance the built and archaeological cultural heritage features of the area 	<ul style="list-style-type: none"> The number of applications granted that adversely affect known archaeological sites and unregistered sites of archaeological importance. Number of Appeals won by LPA on applications that relate to following refusals under Policy CTH/3 relating to development adversely affecting buildings and structures of local importance. The number of applications granted that adversely affect known archaeological sites and unregistered sites of archaeological importance Number of listed buildings or structures demolished Number of locally listed buildings or structures demolished or altered inappropriately. Applications for development which affects buildings or structures of local importance granted against the recommendations of the Conservation Officer SPG relating to protection of the built and historic environment prepared
Prudent use of natural resources		
Energy	<ul style="list-style-type: none"> Ensure new development takes into account the need for more efficient energy use, and the LDP promotes energy generation from 	<ul style="list-style-type: none"> All larger developments not producing 10-25% renewable energy production on site. Onshore wind turbine development within SSA achieving below 5MW Onshore wind turbine development within SSA Onshore wind turbine development greater than 5MW approved outside SSA. BREEAM levels for new build employment (Table NTE/6g) not being met.

	renewable resources	<ul style="list-style-type: none"> • CFSH levels for new build dwellings (Table NTE/6g) not being met. • The capacity of Renewable Energy developments (MW) installed inside Strategic Search Areas by type (TAN8).
Land	<ul style="list-style-type: none"> • Make the most efficient use of land through appropriate allocations and determination of need, and through ensuring the appropriate remediation of contaminated land where relevant 	<ul style="list-style-type: none"> • % of total new housing development on brownfield land. Amount of new development (ha) permitted via conversions and brownfield redevelopment as a % of all development permitted • The number of new dwelling schemes (3 or more) completed at minimum density of 30 dwellings per hectare • Development greater than 0.5 ha on Grade 2 and 3a agricultural land which does not comprise an LDP allocation. • Amount of greenfield and open space lost to development (ha) which is not allocated in the LDP or in accord with LDP Policy. • Average density of housing development permitted on allocated development plan sites.
Water	<ul style="list-style-type: none"> • Prevent pollution of all water bodies, including surface and groundwaters, and ensure development takes into account the need for efficient water use, development must also be located so as not to increase the risk of flooding or the risk from flooding 	<ul style="list-style-type: none"> • Applications granted permission against Officer or EAW advice of the SAB to incorporate SUDS or adequate drainage provision. • Applications granted permission against Officer or EAW advice to incorporate adequate drainage provision. • Applications granted permission against office or statutory consultee advice to incorporate water conservation methods • New development of 1,000 m² or 10 dwellings to submit not submitting a Water Conservation Strategy. • Development permitted in C1 and C2 floodplain areas not meeting all TAN15 tests or EAW recommendations.
Air and Atmosphere	<ul style="list-style-type: none"> • Reduce all forms of air pollution locally and globally improve the atmosphere 	<ul style="list-style-type: none"> • Approval of planning permission which does not conform to LDP2: Parking Standards SPG • Development approved without a Transport Assessment, Travel Plan or Road Safety Audit contrary to officer or statutory consultee recommendation
Minerals and primary resources	<ul style="list-style-type: none"> • Safeguard non-renewable resources and promote 	<ul style="list-style-type: none"> • Number of planning permissions granted for extraction of aggregate mineral not in line with policy MWS/2 new hard rock quarries, extensions to existing quarries or proposals

	reuse of primary resources	<p>to work quarries that do not have an existing valid planning permission.</p> <ul style="list-style-type: none"> • Number of planning permissions granted in the safeguarding hard rock and sand and gravel designations that compromise the long term viability of mineral operations not in line with Policy MWS/3. • Amount of Construction and Demolition Waste sent to landfill. • Rates for recycling, preparation for re-use and composting compared with national targets (Wales Waste Measure 2010). • Amount of waste management capacity developed in the Plan area, or outside of the Plan area to deal with waste arising in Conwy
Maintenance of high and stable levels of economic growth and employment		
Economic diversification	<ul style="list-style-type: none"> • Encourage diversification of the economic base in rural and urban areas 	<ul style="list-style-type: none"> • Level of serviced accommodation within Holiday Accommodation Zone (HAZ).
Employment access	<ul style="list-style-type: none"> • Ensure that there is good access for all to employment 	<ul style="list-style-type: none"> • Annual unemployment level • Number of County residents in employment • Number of residents out-commuting to work to locations outside the County Borough • % of employment land take up in the Urban and Rural Development Strategy Areas in meeting predicted population change requirements. • Employment land development per annum in the Rural Development Strategy Area
Encouraging investment	<ul style="list-style-type: none"> • Emphasise and increase factors conducive to wealth creation and attractiveness to investors 	<ul style="list-style-type: none"> • Annual rate of employment land take up in Conwy. • Annual rate of Employment land take up development per annum in the Urban Development Strategy Area.