COMMUNITY AND LINGUISTIC IMPACT ASSESSMENT

Land off Builder Street, Llandudno

Prepared on behalf of

The Applicant – Lane End Developments Construction Ltd

January 2020
<table>
<thead>
<tr>
<th>Section Number</th>
<th>Section Title</th>
<th>Page Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>INTRODUCTION</td>
<td>1</td>
</tr>
<tr>
<td>2</td>
<td>SITE CONTEXT AND PROPOSED DEVELOPMENT</td>
<td>2</td>
</tr>
<tr>
<td>3</td>
<td>PLANNING POLICY CONTEXT</td>
<td>4</td>
</tr>
<tr>
<td>4</td>
<td>IMPACT ASSESSMENT</td>
<td>7</td>
</tr>
<tr>
<td>5</td>
<td>ENHANCEMENT MEASURES</td>
<td>11</td>
</tr>
<tr>
<td>6</td>
<td>CONCLUSIONS</td>
<td>12</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

1.1. This Community and Linguistic Impact Assessment has been prepared by Grimster Planning on behalf of our Client, Lane End Developments Construction Ltd (hereafter referred to as the “Applicant”).

1.2. The Assessment is submitted in support of a detailed application (hereafter referred to as the “Application”) submitted to Conwy County Council for development on land off Builder Street, Llandudno (hereafter referred to as the “Site”).

1.3. The description of development for which planning permission is sought, as stated on the Application Form, comprises the following:

“Development of 89 no. dwellings comprising 33 no. houses and 56 no. apartments together with associated infrastructure”

1.4. This Assessment should be read in conjunction with the supporting Planning and Affordable Housing Statement, and other supporting technical information submitted as part of the Application.

1.5. Given the nature of the proposed development, the purpose of this Assessment is to consider the potential impacts of the proposed development on matters including housing, population, economics, infrastructure, education and any other pertinent considerations to the proposed development.


1.7. Consistent with the guidance contained in Part 1(d) of Policy CTH5, and Table 1 of LDP6, a full Community and Linguistic Impact Assessment is required for the proposed development given that it comprises the development of over 20 dwellings on an unallocated site in the urban area of Llandudno.
2 SITE CONTEXT AND PROPOSED DEVELOPMENT

Site Context

2.1. Full details of the Site’s location and surroundings are provided in Section 2 of the accompanying Planning and Affordable Housing Statement. Further details are also offered in the accompanying Design and Access Statement. It is not the intention to repeat the full details in this Assessment.

2.2. Notwithstanding this, the principal observations in relation to the Site’s location and surroundings are as follows:

- The Site lies within the administrative area of Conwy County Council;
- The Site is predominantly brownfield in nature given its former use as a goods yard;
- The Site is located within the urban area of Llandudno, surrounded by existing built form comprising a mix of commercial/industrial, residential, retail and Llandudno Railway Station;
- The Site occupies a sustainable location, with excellent access to public transport services (rail and bus) on Oxford Road and Augusta Street, employment opportunities, shops and services (including local medical/health facilities), and local education (Primary and Secondary Schools); and
- The Site benefits from good access to leisure and recreational facilities which would support the health and well-being of future residents of the Site.

2.3. In summary, the Site is considered to occupy an inherently sustainable location close to the centre of the Main Urban Area of Llandudno which is identified as one of the most sustainable locations for new development in the adopted Conwy Local Development Plan.

Proposed Development

2.4. Full details of the proposed development are provided in Section 4 of the accompanying Planning and Affordable Housing Statement. It is not the intention to repeat the full details in this Assessment.

2.5. Notwithstanding this, in summary the proposed development comprises the development of the following:

- 89 no. dwellings (Use Class C3) comprising 33 no. houses, and 56 no. apartments;
- The proposed dwelling mix comprises:
  - 11 no. 2-bed houses at 83.2m²
  - 20 no. 3-bed houses at 94m²
  - 2 no. 4-bed houses at 111.9m²
  - 30 no. 2-bed apartments at 58 m²
  - 16 no. 1-bed apartments at 49m²
  - 10 no. 1 bed apartments at 46m²
- The proposed development will be served via three vehicular points and associated pedestrian/cycle access off Builder Street;
• The proposed development will provide on-site car parking provision, with 1 no. space per 2 bed house, 2 no. spaces per 3 and 4 bed houses, and 1 space per 2.25 apartments (25 no. in total); abd

• The proposed development will comprise 426 sq. m of communal open space for the apartment building. Each house will have its own private garden space

2.6. All of the proposed dwellings will be of an affordable tenure, and will remain so in perpetuity. The Applicant, Lane End Developments Construction Ltd, will deliver the scheme on behalf of a Housing Association.
3 PLANNING POLICY CONTEXT

3.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.

3.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 10 (“PPW10”) published in December 2018.

3.3. An assessment of the proposed development within the context of the development plan and other material considerations is undertaken within the accompanying Planning and Affordable Housing Statement.

3.4. In respect of the Welsh language, the Planning (Wales) Act 2015 introduced legislative provision. The Act requires the Welsh language to be considered as part of the Sustainability Appraisal of local development plans, as well as being a consideration in the decision-making process when it comes to the determination of planning applications.

3.5. Accordingly, the focus of this Assessment is to consider the proposed development in the context of the following policy guidance:

- Planning Policy Wales 10: Edition 10 (December 2018)
- Technical Advice Note 20 (TAN 20): Planning and the Welsh Language (October 2017)
- Conwy Local Development Plan (October 2013)
- LDP6: The Welsh Language (November 2014)

3.6. A summary of the key policy guidance contained within each of the above documents is provided below.

Planning Policy Wales 10 (PPW10)

3.7. Paragraphs 3.25 to 3.29 of PPW10 provide guidance on the need to ensure that the likely effects of development on the Welsh language are assessed and fully understood as part of the planning process. This relates to both plan-making and decision-taking.

3.8. PPW10 recognises that the Welsh language is part of the social and cultural fabric, and the land-use planning system is required to take account of the conditions which are essential to the Welsh language in order to contribute to its use and the Thriving Welsh Language well-being goal.

3.9. PPW10 sets out the need for language impact assessments to be carried out in respect of large developments not allocated in a development plan.

Technical Advice Note 20 (TAN20)

3.10. The guidance contained in TAN20 seeks to support and protect the Welsh language through the planning system. It provides guidance to plan-makers and decision-takers.

3.11. Paragraph 2.6.3 of TAN20 recognises that the distribution of economic growth can affect the linguistic balance.
3.12. Paragraph 3.1.3 states that planning applications should not be routinely subject to a Welsh language impact assessment. However, there is recognition that large scale developments can alter the dynamics of linguistic balance. In this regard, paragraph 3.2.2 states that the impact of large-scale development (on a windfall site) on the Welsh language may be assessed in an area defined as linguistically sensitive or significant.

3.13. Guidance on potential mitigation measures are provided in paragraph 3.4.1 and 3.4.2.

Conwy Local Development Plan

3.14. Policy CTH/5 provides the relevant policy context in relation to the Welsh language. Part 1(d) of this Policy sets out the requirement for a Community and Linguistic Impact Assessment for schemes of 20 dwellings or more on windfall sites in the urban area. The policy requires the consideration and details of mitigation measures, with reference made to the potential use of signs and street names which promote the distinctive culture of Wales.

LDP6: The Welsh Language

3.15. Further guidance, building on Policy CTH/5, is provided is LDP6. Section 6 of LDP6 provides a checklist which allows developers and the Local Planning Authority to assess the likely impact of a development proposal against five aspects of community life, namely:

- Population;
- Quality of Life;
- The Economy;
- Infrastructure; and
- Social and Cultural Life of the Community.

3.16. The checklist set out in Section 6 of LPD6 has been used for the purposes of the Assessment undertaken in Section 4.

Evidence


3.18. The key headlines to be drawn from the Report are as follows:

- In Conwy County, 27.4% of the population can speak Welsh – this compares favourably to 19% of the Welsh population as a whole;
- The ability to speak Welsh is most prevalent amongst those of school age, with 49.2% of 5-15-year olds able to speak Welsh;
- Between 2001 and 2011, the number of Welsh speakers in the County fell from 31,050 to 30,600, a decrease of 6.2%;
- Conwy County has the fifth highest proportion of Welsh speakers in its population across the country;
- In Tudno electoral ward, based on the 2011 Census data there are 3,037 people with skills in Welsh (62.7%), with 1,134 people able to speak Welsh (23.4%), 796 people who can speak, read and write Welsh (16.4%), and 517 people (10.7%) who can understand spoken Welsh only (but don’t speak it, read or write in Welsh);
• In Mostyn electoral ward, based on the 2011 Census data there are 2,396 people with skills in Welsh (68.1%), with 646 people able to speak Welsh (18.4%), 442 people who can speak, read and write Welsh (12.6%), and 381 people (10.8%) who can understand spoken Welsh only (but don’t speak it, read or write in Welsh);

• The number of people who can speak Welsh in both Wards is below the Conwy average, albeit the overall number of people in both Wards with skills in Welsh is above the Conwy average;

• In Llandudno as a whole, the number of people with skills in Welsh is above the Conwy average, but below the national average, albeit the number of Welsh speaking people is above the national average.
4 IMPACT ASSESSMENT

4.1. This Section of the Statement assesses the proposed development and its potential impact on the Welsh language in the context of Table 3 of LDP6.

Is the proposal likely to lead to a population increase or decrease that might affect the balance of English/Welsh speakers, positively or negatively?

4.2. The nature of the proposed development is to deliver much-needed affordable homes to the people of Conwy County, and more specifically Llandudno and its hinterlands. The proposed development will comprise 100% affordable housing, offering a mix of 1, 2, 3 and 4-bed homes and apartments on a neutral tenure basis. The homes will remain affordable in perpetuity.

4.3. As documented in the accompanying Planning and Affordable Housing Statement, there is a significant shortage of housing land in Conwy County, with the Council only able to demonstrate a 2.5-year housing land supply. Furthermore, the affordable housing need in the County has risen to 231 dwellings per year up to 2022. The failure to deliver sufficient new homes in the right place at an affordable cost has the potential to result in out-migration of people, particularly younger people and families, from Llandudno (and Conwy County) in search of a new home. This would only serve to harm the Welsh language.

4.4. Accordingly, the proposed development provides the opportunity to deliver a mix of much-needed new affordable homes in a sustainable location which will be accessible to young single people, couples and young families who might otherwise struggle to access their own property. They are not holiday homes built to attract people from outside the County. The proposed development will help to retain people who were born and raised in Conwy County, and in doing so future generations. This can only serve as a positive to the Welsh language through the retention of the local population.

4.5. The following two tables provide details of the population make-up in the Electoral Wards of Mostyn and Tudno which the Site effectively straddles, as well as that of Llandudno as a whole.

Table 1: Population Make-Up in Mostyn and Tudno Electoral Wards

<table>
<thead>
<tr>
<th>Electoral Ward</th>
<th>All Ages</th>
<th>0-15</th>
<th>16-29</th>
<th>30-44</th>
<th>45-64</th>
<th>65+</th>
<th>All Males</th>
<th>All Females</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mostyn</td>
<td>3,850</td>
<td>650</td>
<td>550</td>
<td>650</td>
<td>1,100</td>
<td>900</td>
<td>1,800</td>
<td>2,000</td>
</tr>
<tr>
<td></td>
<td>3,850</td>
<td>16.7%</td>
<td>14.0%</td>
<td>17.0%</td>
<td>28.7%</td>
<td>23.6%</td>
<td>47.3%</td>
<td>52.7%</td>
</tr>
<tr>
<td>Tudno</td>
<td>5,050</td>
<td>900</td>
<td>850</td>
<td>750</td>
<td>1,400</td>
<td>1,100</td>
<td>47.4%</td>
<td>52.6%</td>
</tr>
<tr>
<td></td>
<td>5,050</td>
<td>17.6%</td>
<td>17.2%</td>
<td>15.1%</td>
<td>28.0%</td>
<td>22.1%</td>
<td>47.4%</td>
<td>52.6%</td>
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</table>
Table 2: Population Make-Up in Mostyn and Tudno Electoral Wards

<table>
<thead>
<tr>
<th>Community Council Area</th>
<th>All Ages</th>
<th>0-15</th>
<th>16-29</th>
<th>30-44</th>
<th>45-64</th>
<th>65+</th>
<th>All Males</th>
<th>All Females</th>
</tr>
</thead>
<tbody>
<tr>
<td>Llandudno</td>
<td>20,800</td>
<td>3,050</td>
<td>2,850</td>
<td>3,000</td>
<td>5,800</td>
<td>6,100</td>
<td>10,000</td>
<td>10,750</td>
</tr>
<tr>
<td></td>
<td>20,800</td>
<td>14.6%</td>
<td>13.8%</td>
<td>14.3%</td>
<td>27.9%</td>
<td>29.4%</td>
<td>48.2%</td>
<td>51.8%</td>
</tr>
</tbody>
</table>

4.6. As can be seen above, there is a largely balanced population in Llandudno in relation to males and females. Over half of the population in Llandudno, and the two electoral wards, is in the age group of 45+. Just under a third of the population in Llandudno is 65+. This exceeds the Conwy average of 27.4%, and suggest that Llandudno is a popular location for people of retirement age.

4.7. At the same time, there is a need to ensure that the area provides sufficient accommodation for people in the 16-29 age group to get a foot on the property ladder, and to retain the local population. The same goes for the 30-44 age group, which will more typically comprise young families looking to upsize into a family home, and again helping to retain the living in Llandudno and the electoral wards. The proposed development, through the housing mix and tenure, is designed to meet and facilitate these needs.

Is the proposal likely to lead to either increased in or out-migration?

4.8. For the reasons documented above, the proposed development has the potential to result in the retention of the local population, particularly those in the 16-44 age group, whilst potentially also attracting the in-migration of people from other parts of the County who might otherwise struggle to access an affordable property of their own. This should be viewed positively, with the alternative being the relocation of those people to neighbouring Counties or other parts of Wales, or across the border in England.

Is the proposal likely to lead to a changing age structure for the community area?

4.9. The proposed mix and tenure of accommodation is primarily focused towards younger single people, couples, and families. The proposed development will provide new homes for young people and families looking to get on to the property ladder with an affordable property. This is viewed as a positive – a failure to deliver such housing in Llandudno will result in the relocation of the age group to other parts of the County, or even moving outside of Conwy County. As demonstrated in the response to Question 1 above, over 50% of the existing demographic in Llandudno is in the 45+ group. Accordingly, the proposed development has the potential to ensure that the 16-44 age groups are catered for in respect of housing provision, providing a mix of new houses and apartments to support single people, couples and young families looking to get on the property ladder, and those looking to upsize, whilst continuing to remain living in Llandudno. This in turn has the potential to support the continued use of the Welsh language by retaining younger members of the local population in the town and its hinterlands.
Is the proposal likely to have an impact on the quality of life of the local people?

4.10. The Site is currently vacant, and does not make a positive contribution to the local area. The Site lies adjacent to Llandudno Railway Station, existing commercial/industrial uses south of Builder Street, and existing residential/retail uses on Oxford Road.

4.11. Aesthetically, the proposed development will make a positive contribution to the local area through the redevelopment of a vacant parcel of land which at present has the potential to attract anti-social behaviour and nuisance. It will deliver a new use which will make a positive contribution to local community life with more people residing in the area, and through that there is the potential to form new social connections and friendships. The proposed development will also deliver new dwellings in a sustainable location, providing future residents with the opportunity to use sustainable modes of transport without relying on the private car. This has the added benefit of limiting the number of vehicular movements on the local highway network (should people choose to use other modes of transport), and as such would serve as a betterment to the local quality of life than people who might otherwise travel to and from the Site (and from outside of Llandudno) as a place of work (in view of its existing employment allocation).

Is the proposal likely to have a detrimental impact on local businesses and local jobs?

4.12. The proposed development, given its location, will provide future residents with excellent access to local employment opportunities, shops and everyday services in Llandudno. This in turn has the potential to positively benefit local businesses and employers in terms of increased local expenditure (as a result of increased custom) and access to potential employees respectively. This can only be viewed as making a positive contribution towards helping sustain the vitality of the town and Welsh-speaking businesses.

Is the proposal likely to lead to greater economic diversity in the community (or wider area?)

4.13. The provision and availability of an increased local workforce could attract new inward investment into the town. A key ingredient in attracting new business to any town is the availability of a local workforce – however, without a sufficient supply of housing which is accessible and affordable, people will not live in that town, and thus businesses will not re-locate there. Further, there is the risk that existing businesses relocate if they are unable to fill vacancies with suitably qualified/skilled employees.

4.14. The proposed development will provide the opportunity to do just that, providing new homes adjacent to a well-established employment area, and an increased local workforce to support continued Government funding towards the Llandudno Enterprise Zone.

4.15. Whilst the availability of jobs could attract non-Welsh speakers, at the same time the failure to deliver new and affordable housing will not allow for Welsh speakers to access existing/future jobs in the first place.

Is the proposal likely to have an impact on local wage/salary levels and/or house prices?

4.16. The very nature of the proposed development, as a 100% affordable housing scheme, is designed to provide new housing which is accessible to local people and who might not otherwise be able to afford to live in Llandudno owing to the shortage of new homes. The proposed dwellings will remain affordable in perpetuity. As such, the availability of a local workforce for businesses to access should ensure that wages remain at a level which allows local businesses to operate in the area,
and in same time will provide local people with the opportunity to access their own home. The alternative is businesses being unable to fill roles due to a lack of locally skilled/available people, and as such having to pay larger salaries to attract people from outside of the County, or alternatively relocating their businesses elsewhere in the County or into neighbouring Counties.

Is the proposal likely to have an impact on local infrastructure and services provision?

4.17. As outlined earlier in this Assessment, the Site is sustainably located with excellent access to public transport, shops, services, employment and education. The proposed development will increase the demand on local medical services and education, but at the same time it will also help to sustain them with people who have been born and raised in Conwy County by delivering much needed affordable housing. This will help to preserve the Welsh language in the community by retaining those people in Conwy County, and young people who are identified as being the most prevalent when it comes to speaking the Welsh language – the proposed development is not aimed at attracting large populations of people from outside of Llandudno or Conwy County.

Will the proposal potentially lead to social tensions, conflict or serious divisions within the (Welsh speaking) community?

4.18. It is not considered that the proposed development will give rise to any such tensions or divisions. The delivery of much-needed new homes is intended to cater for those people looking to access their own property, and in doing so prevent them from having to potentially leave their local area and even Conwy County to access a home. It is expected that the majority of the properties will be occupied by existing residents of Llandudno and potentially other parts of Conwy County who already have an affiliation with the town and the Welsh speaking community.

Will the proposal potentially lead to changes in local – Welsh – traditions/culture?

4.19. Given that the proposed development is delivering much-needed affordable housing, if anything it has the potential to strengthen the local community. The retention/increase in the local population, and most likely age groups 16-29 and 30-44 offers the opportunity for new social connections and/or social groups/initiatives to be formed and sustained (such as local youth groups with young people identified as being the most prevalent when it comes to speaking the Welsh language, voluntary groups etc). A failure to deliver new homes, and with it a greater risk of out-migration, has a much bigger potential to harm Welsh traditions and cultures.

Is the proposal likely to have an impact on the use of the Welsh language in the community?

4.20. The proposed development will deliver new affordable dwellings which will cater for the needs of different groups, whether it be single people, couples or young families looking at access their own property. The dwellings are aimed at people living in the local community of Llandudno, and other parts of Conwy County. There are not being built with the intention of attracting non-Welsh speaking members of society, and measures to control the occupancy of the properties will be discussed with the Housing Team at Conwy County Council.

4.21. By delivering new dwellings with the Welsh community in mind, the proposed development has the potential to have a positive impact on the use of the Welsh language in the local area, whether it be in employment, education or other social activities.
5 ENHANCEMENT MEASURES

5.1. As required by LDP6, the Applicant has given consideration to potential measures to help encourage and promote the Welsh language, and to accommodate Welsh speaking members of society.

5.2. Although the Assessment undertaken in Section 4 has demonstrated that the proposed development has the potential to positively impact on the Welsh language, a number of enhancement measures have been identified and are proposed by the Applicant as documented below:

- The use of bi-lingual street names and signage within the Site to accommodate Welsh speaking residents, and to support and encourage the use of the Welsh language;

- An agreement for the proposed dwellings to be accessed first by those people in housing need, having reference to the Council’s local housing register. A cascade approach to occupancy will be discussed with the Housing Team at Conwy County Council;

- Marketing and advertising of the properties in both Welsh and English;

- On-site notices/homeowner information packs in both Welsh and English; and

- The preparation of a Construction Method Statement and detailed lighting design (secured by planning condition).
CONCLUSIONS

6.1. This Statement has been prepared in support of a detailed application for the proposed development of land off Builder Street, Llandudno.

6.2. It has assessed the potential impacts of the proposed development on the Welsh language. In doing so, the following headline conclusions can be drawn against the guidance contained in LDP6:

- **Population** – the proposed development will deliver much-needed affordable homes which can be accessed by single people, couples, families looking to get on the property ladder, or upsize, typically in age groups 16-29 and 30-44 (but not exclusively limited to these where other people are also in housing need). This has the potential to help retain younger members of the local population who might otherwise need to re-locate elsewhere in or outside of the County.

- **Quality of Life** – the proposed development will deliver quality new homes and apartments for people to live in, and which will be accessible both in respect of location and affordability. The proposed development will comprise private gardens and on-site communal open space areas for the enjoying and well-being of residents and on a Site which is inherently sustainable and benefits from excellent access to shops, services, employment opportunities and education by foot and cycling, reducing reliance on the private car and offering health benefits;

- **The Economy** – the proposed development will deliver affordable housing on a centrally located, sustainable site. Future residents have the potential to access local jobs, as well as shops and services, increasing local expenditure whilst also helping to retain and potentially attract new investment through the retention of a local workforce of working age;

- **Infrastructure** – the delivery of new homes on a vacant brownfield site is sustainable development in itself, making efficient use of land which has failed to come forward for its designated employment use since at least the start of the Local Development Plan period in 2007; and

- **Social and Cultural Life of the Community** – the retention of people in the 16-29 and 30-44 age groups has a significant role to play in ensuring a balanced community in Llandudno. Socially, this is important as in the very least it allows for social groups/youth clubs to form and friendships to emerge. The loss of people in the younger age groups due to their inability to access their own home can have a detrimental effect on the wider society and lead to an imbalance in the population make-up.

6.3. Taken as a whole, alongside the enhancement measures the above have the ability to generate considerable benefits in respect of supporting and sustaining the use of the Welsh language within the community. Paragraph 3.18 of this Assessment has documented the reduction in Welsh speaking residents of the County between the 2001 and 2011 Census. Given that the use of the Welsh language is recognised as being most prevalent in young people, there is a clear need to ensure that the younger age groups of the County are provided for through an appropriate housing mix and tenure in the County and its Main Urban Areas in order to limit out-migration. The populations statistics in this Assessment have demonstrated that the 65+ age group demographic in Llandudno is above the County average, and thus access to a suitable housing stock is needed.
to retain the younger population whilst also supporting increased in-migration to this Main Urban Area through which social, economic and environmental benefits can be realised.

6.4. Overall, the proposed development has the potential to make a positive contribution to the Welsh language in this Main Urban Area of Conwy.