

# CADNANT

PLANNING

**LAND AT Tŷ HAPUS, CWM ROAD, LLANDUDNO  
LL30 1HB,  
COMMUNITY AND LINGUISTIC IMPACT  
ASSESSMENT**

GRWP CYNEFIN & FIRST CHOISE HOUSING  
ASSOCIATION (FCHA)

MARCH 2025

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DRAFT FOR PRE-APPLICATION  
CONSULTATION (PAC)

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## Community and Linguistic Impact Assessment



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# 1. Introduction

- 1.1 This Community and Linguistic Impact Assessment (CLIA) accompanies a full planning application by Grŵp Cynefin and First Choice Housing Association for a residential development on land by Tŷ Hapus, Cwm Road, Llandudno.
- 1.2 The proposal comprises of total of 29 affordable dwellings providing a mixture of one and two-bedroom apartments, including general needs apartments, assisted living apartments and accessible apartments, in addition to two-bedroom and three-bedroom dwellinghouses. The application site lies within the development boundary of Llandudno, which is included within the 'Urban Development Strategy Area', and is a brownfield site.
- 1.3 Conwy County Borough Council (CCBC) has demonstrated its support towards safeguarding the Welsh language through the planning system by developing policies which seek to ensure that all forms of development support the character and language balance of predominantly Welsh speaking communities. The planning system also seeks to defend such communities from inappropriate development which has the potential to undermine the Welsh language.
- 1.4 Policy CTH/5 – 'The Welsh Language' of the LDP requires the preparation of a Community and Linguistic Impact Assessment (CLIA) to accompany planning applications for housing applications for 20 units of more within the Urban Development Strategy Area.
- 1.5 This CLIA presents an overview of the proposed development, of planning policy guidance relating to the Welsh language and of the Welsh language profile of Llandudno and Conwy county. Section 5 then considers the effects of the proposed development and Section 6 summarises the perceived effects which arise from the proposed development.
- 1.6 This CLIA should be read giving full regard to the application's accompanying documentation including proposed plans, Planning Statement and Design and Access Statement.

## 2. Proposed development

### Site location and description

- 2.1 The application site is located to the west of the Tŷ Hapus Community Centre along Ffordd Penrhyn, Llandudno LL30 1HB. The site borders Cwm Road to the west and Ffordd Penrhyn to the south, whilst existing dwellings are located along the site's northern border. Figure 2.1 provides an aerial view identifying the site's location.

*Figure 2.1 Aerial image identifying application site*



- 2.2 The application site comprises of brownfield land containing a former multi-use games area (MUGA) which has fallen into disrepair and out of use. Subsequently, the area lost its status as protected open space, as confirmed by Conwy County Borough Council (CCBC). The application site is located within the development boundary of Llandudno and forms part of the built-up area of Llandudno, within an existing residential estate.
- 2.3 Access to the application site would be gained from Cwm Road in the north-western corner of the site, with a row of existing housing located on the adjacent side of Cwm Road to the west, along with Ysgol Morfa Rhianedd.

### Development proposals

- 2.4 The proposal relates to a residential development comprising of a total of 29 units providing a mixture of one- and two-bed apartments, with a mixture of general needs,

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accessible and assisted living units, along with two- and three-bed dwellinghouses, provided as 100% affordable dwellings. The housing mix comprises of:

*Table 2.1 Proposed housing mix*

House size	Type	Number of units
4P2B	Semi-detached	4
4P2B	Terraced	1
5P3B	Semi-detached	2
3P2B	Apartment	3
2P1B	Accessible apartments	3
2P1B	Assisted living apartments	6
2P1B	Apartment	10

- 2.5 A new vehicular and pedestrian access is proposed from Cwm Road to the serve the proposed development, which would then connect to a new internal access road and two parking courts serving the proposed dwellings. A new pedestrian footpath is also proposed along the southern border of the site running adjacent to Ffordd Penrhyn.

### 3. Legislation, policy and guidance

- 3.1 A summary of all relevant national and local planning policies relating to the proposed development is provided within the Planning Statement. It is not the intention to repeat those in this section of the CLIA.
- 3.2 The Welsh language is a material planning consideration in the determination of planning applications in Wales and is recognised in relevant legislation, national and local planning policy frameworks and strategies. An overview of legislation, policy and guidance which are of relevance to Welsh language and a material planning consideration is provided in tables 3.1-3.6.

**Table 3.1 National planning and language legislation**

Document	Summary
<i>Welsh Language (Wales) Measure 2011</i> (National Assembly for Wales, 2011)	The <i>Welsh Language (Wales) Measure 2011</i> made provisions for the official status of the Welsh language in Wales and created a new legislative framework for the Welsh language.
<i>Well-being of Future Generations (Wales) Act 2015</i> (National Assembly for Wales, 2015)	Sets ambitious, long-term well-being goals to reflect the Wales that the people of Wales want to live in, now and in the future. One of its goals is to be a Wales of vibrant culture and thriving Welsh language where society promotes and protects culture, heritage and the Welsh language. It is an important milestone for the language, underlining its official status.
<i>Planning (Wales) Act 2015</i> (National Assembly for Wales, 2015)	Sections 11 and 31 of the Act concern the Welsh language. Section 31 of the Act clarifies that effects on the Welsh language may be a consideration when determining planning applications, so far as it is material to the application. Section 11 of the Act makes it mandatory for all local planning authorities to consider the effect of their development plans on the Welsh language, by undertaking an appropriate assessment as part of their Sustainability Appraisal of the plan.

**Table 3.2 National planning policy and language policy framework**

Document	Summary
<i>Planning Policy Wales</i> (Edition 12) (Welsh Government, 2024)	Planning Policy Wales (PPW) acknowledges that the Welsh language is part of the social and cultural fabric of Wales and that the Welsh Government is committed to ensuring that the

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	<p>Welsh language is supported and encouraged to flourish as a language of many communities all over Wales.</p> <p>The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its use and the Thriving Welsh Language well-being goal.</p>
<p>Technical Advice Note (TAN) 20 – Planning and the Welsh Language (Welsh Government, 2017)</p>	<p>TAN 20 provides guidance on how the planning system considers the implications of the Welsh language when preparing LDPs and making decisions. The LPA should consider the needs and welfare of the Welsh language, and in so doing, contribute to its well-being. Changes introduced in the current version of TAN 20 are as a result of bringing into force provisions contained in the Planning (Wales) Act 2015.</p> <p>The main changes relate to the following matters:</p> <ul style="list-style-type: none"> <li>• The link between planning for the Welsh language through land-use planning and community planning;</li> <li>• Providing clarification that decision makers may take the language into account where it is material to the application;</li> <li>• Allow language impact assessments in certain specified circumstances.</li> </ul>
<p>Future Wales The National Plan 2040</p>	<p>Future Wales identifies a range of important Regional Growth Areas which, through specific policies in Strategic and Local Development Plans, should retain and enhance the commercial and public service base that make them focal points in their areas. Llandudno and Colwyn Bay are identified as a Regional Growth Area.</p> <p>The Welsh Government supports sustainable growth and regeneration in regionally important towns along the northern Coast. Holyhead, Caernarfon, Bangor, Llandudno, Colwyn Bay, Rhyl and Prestatyn will be a focus for managed growth and they have an important sub-regional role complementing the National Growth Area of Wrexham and Deeside. Strategic and Local Development Plans should recognise the roles of these places as a focus for housing, employment, tourism,</p>



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	<p>public transport and key services within their wider areas and support their continued function as focal points for sub-regional growth.</p> <p>Future Wales acknowledges that Welsh is a living language and the ambition for the Welsh language to reach a million Welsh speakers by 2050.</p> <p>Future Wales' spatial strategy supports sustainable growth. Any place without jobs, homes, community spaces and wildlife has no prospect of having a thriving and cohesive community, Welsh language or economy.</p> <p>Within the North (which includes Conwy), 41.9% of the population speak Welsh; a 2.4% increase since 2009.</p> <p>Future Wales guides that development plans should contain settlement hierarchies and strategies to distribute growth in such a way that creates the conditions for Welsh to thrive and to be preserved as the community language in the many places where everyday life takes place through the medium of Welsh.</p>
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**Table 2.3 National language strategies**

Document	Summary
<i>A million Welsh speakers</i> (Welsh Government, 2017)	<p>The strategy was launched on the 10th July 2017 and sets out Welsh Government's strategic priorities on how to reach a million Welsh speakers by 2050.</p> <p>Three strategic themes have been identified within the strategy to achieve its vision:</p> <ul style="list-style-type: none"> <li>• Increasing the number of Welsh speakers;</li> <li>• Increasing the use of Welsh; and</li> <li>• Creating favourable conditions – infrastructure and context.</li> </ul>

**Table 3.4 Local planning policies**

Document	Summary
<i>Conwy Local Development Plan</i> (Conwy County Borough Council, 2013)	<p>The development plan consists of the Conwy LDP (2013) providing policy guidance relating to the impact of development on the Welsh language. The Conwy LDP establishes a policy framework and makes provision for the development needs of the County of Conwy for the period from 2007 to 2022. It will be used by the Council to guide and control development,</p>

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	<p>providing a basis for consistent and appropriate decisions on planning applications.</p> <p>CCBC has demonstrated its support towards safeguarding the Welsh language through the planning system by developing policies which seek to ensure that all forms of development supports the character and language balance of predominantly Welsh speaking communities and seeks to defend such communities from inappropriate development which has the potential to undermine the Welsh language.</p> <p><b>Strategic approach to development</b></p> <p>Policy DP/2 'Overarching Strategic Approach' of the Conwy LDP identified that most new development will take place within, and on the fringe of, Urban Areas which include Abergele/Pensarn, Colwyn Bay, Conwy, Deganwy/Llanrhos, Llandudno, Llandudno Junction, Llanfairfechan, Llanrwst, Mochdre, Penmaenmawr, Penrhyn Bay/Penrhynside and Towyn/Kinmel Bay. These form the Urban Development Strategy Area (UDSA).</p> <p>Over the Plan period, approximately 85% of the housing and 85% of employment development (through completions, commitments, windfall and new allocations) will be located primarily within, and on the fringe of, the urban areas to reflect the spatial priorities of contributing to the creation of sustainable communities.</p> <p><b>Welsh language</b></p> <p>Paragraph 4.7.6.1 of the LDP advises that the Welsh language is an important part of the fabric and heritage of local communities. The Council will support and promote the Welsh language by ensuring there is sufficient employment and housing opportunities to retain Welsh-speakers throughout the Plan area.</p> <p>Policy CTH/5 relates to the Welsh Language and requires development to support and sustain the long-term well-being of the Welsh language. Development which because of its size,</p>
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	<p>scale or location, will significantly harm the character and linguistic balance of a community, will be resisted.</p> <p>Policy CTH/5 confirms that the LDP strategy has been assessed for Welsh language impact and requires residential developments of 20 or more units on windfall sites within the Urban Development Strategy Area to be accompanied by a Community and Linguistic Impact Assessment.</p> <p>Given that the site is a contingency site for housing in the Conwy LDP for residential development, its suitability and appropriateness to accommodate residential development, and the impact of its development on the Welsh language has been previously assessed as part of the preparation of the Conwy LDP. The effect of the residential development on the Welsh language has been considered as acceptable. Anwyl Construction Company Limited are committed to supporting the Welsh language and culture and have prepared a CLIA to accompany this planning application.</p> <p>The policy also encourages the provision of bilingual signs and the retention of traditional Welsh names for new developments and streets throughout the county.</p>
<p><i>Conwy Supplementary Planning Guidance: LDP6 Welsh Language</i></p>	<p>Supplementary Planning Guidance (SPG) LDP6 Welsh Language provides further guidance on the details to be considered within Community and Linguistic Impact Assessments and developing mitigation measures. Consideration has been given to that guidance when undertaking this Community and Linguistic Impact Assessment</p>

**Table 3.5 Other relevant guidance**

Document	Summary
<p><i>Planning and the Welsh Language: The Way Ahead</i> (Welsh Language Board, Home Builders Federation and Welsh Assembly Government, 2005)</p>	<p>This document is the work completed by a consortium of organisations made up of local authorities, The Welsh Language Board, the Home Builders Federation and the Welsh Government. The document represents the collective efforts of all partners involved who have an interest in developing a better understanding of the relationship between land use planning and the Welsh language in order to promote the well-being of</p>

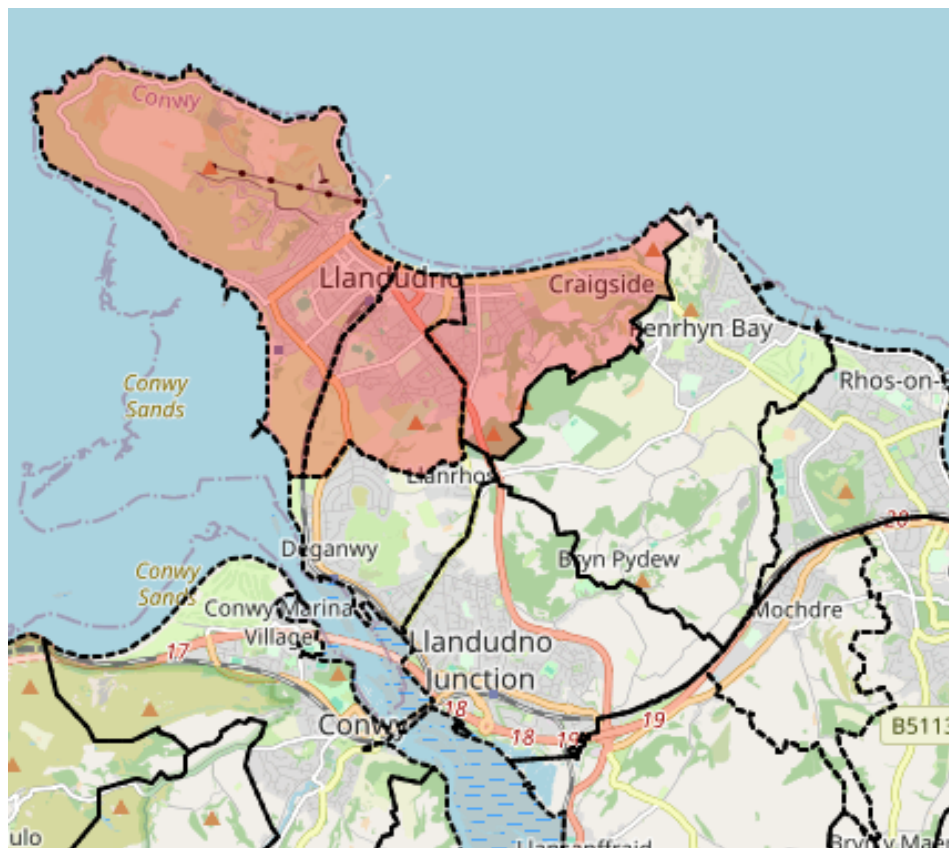
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	<p>the language and the cultural character of local communities.</p> <p>The document does not represent the planning policy view of any of the participating bodies.</p> <p>The document provides best practice guidance. The best practice guidance is reflected in the Conwy's SPG relating to the Welsh language.</p>
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## 4. Welsh language profile

- 4.1 The proposed development is located within the Tudno ward but lies within the wider built-up area of Llandudno. Subsequently, the wards of Gogarth Mostyn and Craig y Don, along with Tudno, would represent the urban area of Llandudno as a whole. Data from these wards have therefore been included within the baseline data and totalled to provide an overview for Llandudno. The wards of Gogarth and Mostyn were combined to create a single ward, Gogarth Mostyn, between the 2011 and 2021 Census'. As the geographical boundaries for these areas remained the same, both will still be adopted for the baseline condition and combine to create a representation of Llandudno. Three geographical boundaries are used for comparison purposes, those being Llandudno, Conwy and Wales.
- 4.2 A map showing the ward areas adopted as the baseline for the Llandudno area for the Census data is included within Figure 4.1 below.

*Figure 4.1 Map outlining the wards comprising the Llandudno area (Nomis, 2021)*



- 4.3 Data from the 2011 and 2021 Census' have been adopted for assessment within this section as to show trends and comparisons over time.

## Population characteristics

4.4 Table 4.1 displays the resident population for the wards of Tudno, Craig y Don and Gogarth Mostyn for Llandudno, as well as Conwy and Wales in 2011 and 2021.

**Table 4.1 Resident population by area for 2011 and 2021 (Nomis Census 2011 and 2021)**

Area	Resident population	
	2011	2021
Tudno	5,008	4,689
Craig y Don	3,424	3,327
Gogarth Mostyn	7,386	7,114
<b>Total (representative of Llandudno)</b>	15,818	15,130
Conwy	115,228	114,741
Wales	3,063,456	3,107,494

4.5 Between 2011 and 2021 Llandudno and Conwy County experienced decreases in its resident population of 688 and 487, respectively. This contrasts the trend experienced across Wales as a whole, where there was an increase of 44,038 people to a total of 3,107,494, the highest population ever recorded through a census in Wales<sup>1</sup>.

4.6 The Tudno ward individually experienced a population decrease of 319 compared to 97 and 271 witnessed across Craig y Don and Gogarth Mostyn, suggesting that the population decrease experienced within Llandudno was spread across various wards and not restricted to a particular area within the settlement.

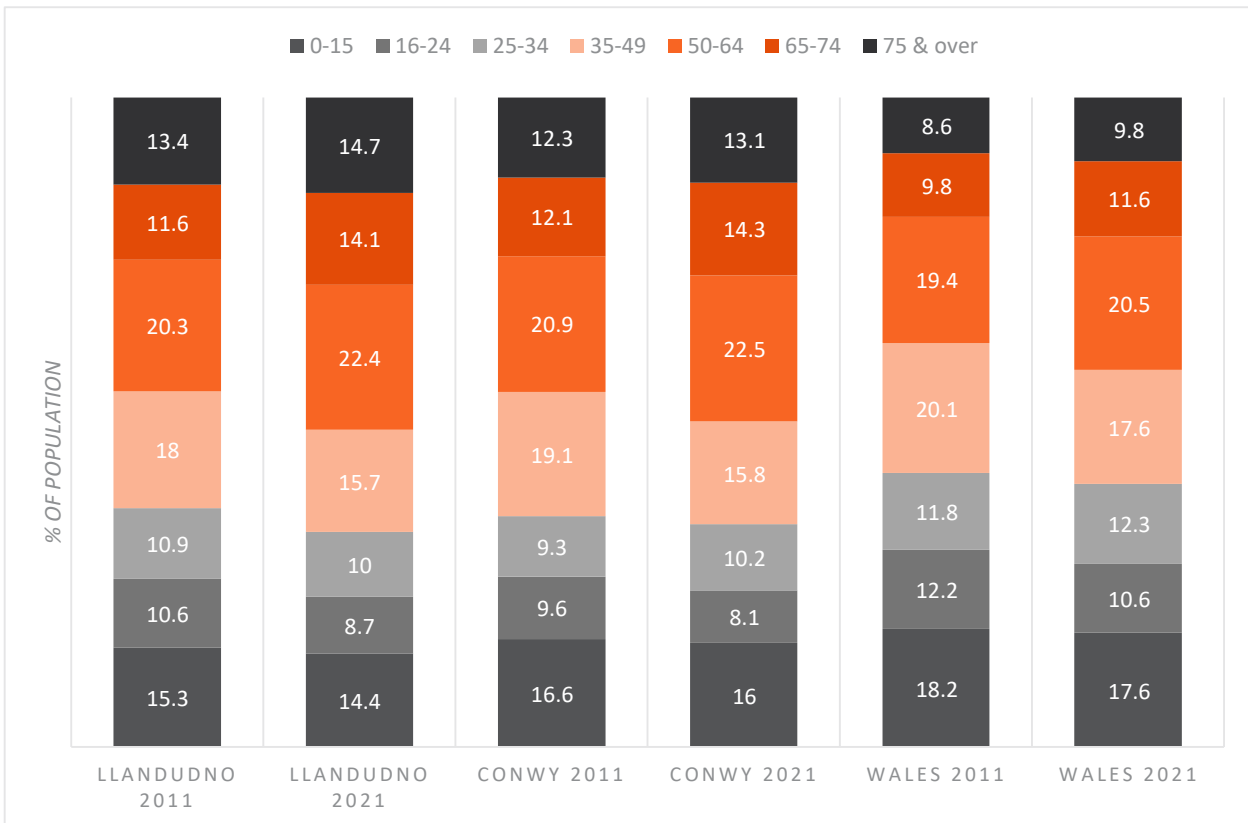
## Age profile

4.7 Figure 4.2 details the population age structures for Llandudno wards, Llandudno as a whole, Conwy and Wales in 2011 and 2021.

<sup>1</sup> ONS: Population and household estimates, Wales: Census 2021 (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimateswales/>)

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**Figure 4.2 Population age structure of Llandudno, Conwy and Wales for 2011<sup>2</sup> and 2021<sup>3</sup>**



- 4.8 Llandudno experienced the greatest increase in the number of population aged 65-74 followed by the 50-64 and 75 and over age group, whilst the greatest decrease in number of the population was experienced in the 35-49 age group followed by the 16-24 age group. This highlights a definitive shift towards an ageing population as 51.4% of the population were aged 50 and above in 2021, compared to 45.3% in 2011. This could be the result of in-migration of older people moving to Llandudno for retirement, combined with out-migration of younger people, leaving in search of employment opportunities and housing.
- 4.9 Conwy experienced the greatest increase in the number of the population aged 65-74 followed by the 50-64 age group, whilst the greatest decrease in the number of the population was experienced in the 35-49 age group followed by the 16-24 age group.
- 4.10 Wales experienced the greatest increase in the number of the population aged 65-74 followed by the 50-64 and 75 and over age groups, whilst the greatest decrease in the

<sup>2</sup> Nomis: Census 2011: Age by single year (QS103EW) (percentages calculated by Cadnant Planning Ltd)

<sup>3</sup> Nomis: Census 2021: Age by single year (TS007) (percentages calculated by Cadnant Planning Ltd)

number of the population was experienced in the 35-49 age group followed by the 16-24 age group.

## Welsh language profile

### Welsh speakers

4.11 Table 4.3 contains the number of Welsh speakers and percentage of the total population (aged 3 and over) for Llandudno, Conwy and Wales in 2011 and 2021.

**Table 4.3 Number of Welsh speakers and percentage of total population (aged 3 and over) by area, 2011<sup>4</sup> and 2021<sup>5</sup>**

Wards	2011			2021		
	Total population (aged 3 and over)	Welsh speakers		Total population (aged 3 and over)	Welsh speakers	
	Number	Number	% of total population	Number	Number	% of total population
Llandudno	15,341	2,987	19.5	14,805	2,564	17.3
Conwy	111,724	30,600	27.4	111,805	29,000	25.9
Wales	2,955,841	562,016	19.0	3,018,172	538,296	17.8

4.12 It can be seen from the table above that the status of the Welsh language within Llandudno is relatively low; the percentage of the population that spoke Welsh was lower than across Conwy as a whole for both 2011 and 2021. The percentage of Welsh speakers in Llandudno is similar to the national average, although it was slightly above the Welsh average in 2011 but fell below it in 2021, albeit only marginally.

4.13 Notwithstanding the above, the decrease in proportion of Welsh speakers experienced in Llandudno between 2011 and 2021 is in line with the trends experienced across Conwy and Wales, which also saw reductions of 1.5% and 1.2%, compared to Llandudno's 2.2%.

4.14 Figure 4.3 provides information on the proportion of Welsh speakers by age group in 2011 and 2021 for Llandudno, Conwy and Wales.

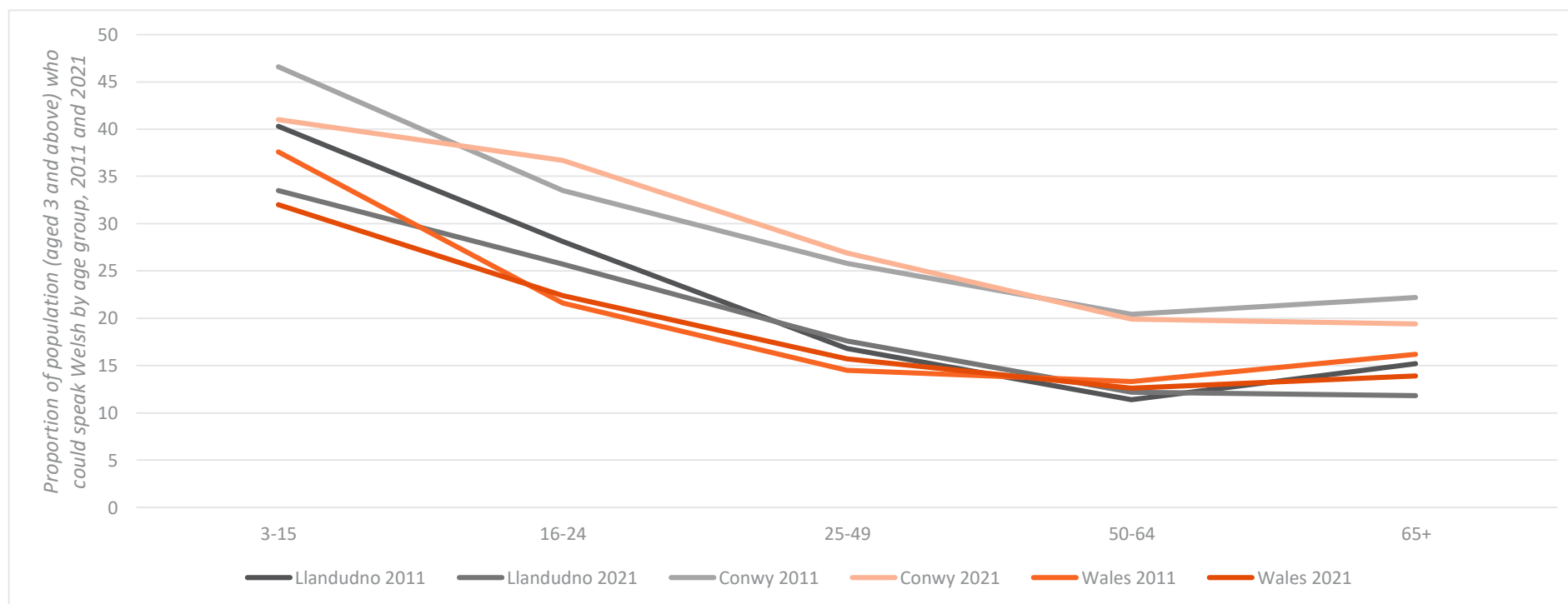
<sup>4</sup> Nomis: Census 2011: Welsh language skills (KS207WA)

<sup>5</sup> Nomis: Census 2021: Welsh language skills (speaking) (TS033)



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**Figure 4.3 Proportion of the population (aged 3 and above) who could speak Welsh by age group, 2011<sup>6</sup> and 2021<sup>7</sup>**



	Llandudno 2011	Llandudno 2021	Conwy 2011	Conwy 2021	Wales 2011	Wales 2021
3-15	40.3	33.5	46.6	41	37.6	32
16-24	28.1	25.7	33.5	36.7	21.6	22.4
25-49	16.8	17.6	25.8	26.9	14.5	15.7
50-64	11.4	12.2	20.4	19.9	13.3	12.6
65+	15.2	11.8	22.2	19.4	16.2	13.9

<sup>6</sup> Nomis: Census 2011: Ability to speak Welsh skills by national identity by sex by age (DC2203WA) (percentages calculated by Cadnant Planning Ltd)

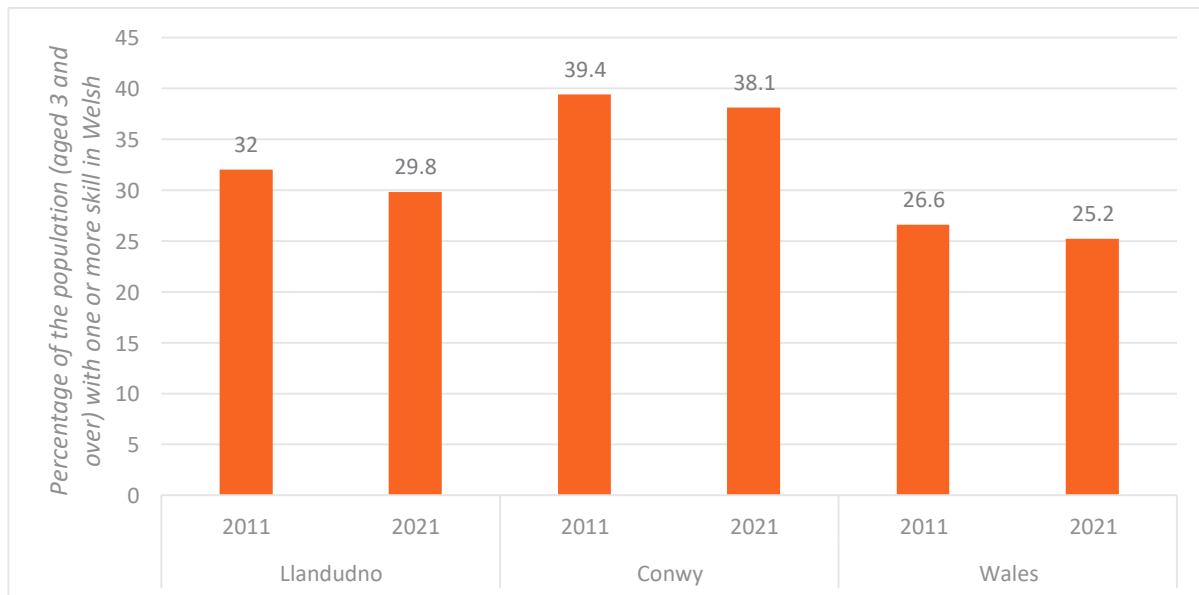
<sup>7</sup> Nomis: Census 2021: Welsh language skills by sex by age (RM161) (percentages calculated by Cadnant Planning Ltd)

- 4.15 As can be seen in the chart in Figure 4.3, Llandudno experienced a significant decrease in the proportion of young people aged 3-15 who could speak Welsh between 2011 and 2021. This trend was reflected across the Conwy County region and Wales as a whole. The only age groups which experienced an increase in the proportion of Welsh speakers was the 25-49 and 50-64 age groups.
- 4.16 The change in the Welsh speakers in different age groups varied across Conwy County, with the 16-24 and 25-49 age groups seeing an increase and the 5-64 and 65+ age group is experiencing a decrease.
- 4.17 During this period Wales experienced an overall reduction in the number and proportion of the population (aged 3 and over) who could speak Welsh between 2011 and 2021.

## Welsh language skills

- 4.18 Figure 4.4 shows the percentage of the total population aged 3 and over with one or more skills in Welsh by area in 2011 and 2021.

**Figure 4.4 Percentage of total population aged 3 and over with one or more skills in Welsh by area in 2011<sup>8</sup> and 2021<sup>9</sup>**



- 4.19 Llandudno, Conwy and Wales experienced a decrease in the percentage of the population (aged 3 and over) with one or skills in Welsh between 2011 and 2021.

<sup>8</sup> Nomis: Census 2011: Welsh language skills (KS207WA) (percentages calculated by Cadnant Planning Ltd)

<sup>9</sup> Nomis: Census 2021: Welsh language skills by sex by age (RM161) (percentages calculated by Cadnant Planning Ltd)

## 5. Assessment

- 5.1 This section presents the potential effects of the proposed development on the community, Welsh language and culture.
- 5.2 The approach to the consideration of effects undertaken in this CLIA has been informed by the following national and local planning policy guidance and strategies, all of which are adopted except for *Planning and the Welsh Language: The Way Ahead*:
- *Planning and the Welsh Language: The Way Ahead* (Welsh Language Board, Home Builders Federation, Welsh Assembly Government, 2005);
  - *Supplementary Planning Guidance (SPG) 'LDP6: The Welsh Language'* (Conwy County Borough Council, 2014); and
  - *Technical Advice Note (TAN) 20 – Planning and the Welsh Language* (WG, 2017).
- 5.3 *Planning and the Welsh Language: The Way Ahead* offers best practice guidance on the matters that may be considered in CLIAs for project-specific development. This guidance has been replicated within the adopted SPG by CCBC.
- 5.4 Policy CTH/5 of the LDP requires the preparation of a Community and Linguistic Impact Assessment (CLIA) to accompany planning applications for housing applications for 20 units of more within the Urban Development Strategy Area.
- 5.5 The Community and Linguistic Impact Assessment (CLIA) of the Conwy LDP is contained in Appendix 1 of Revised Background Paper 33 'Language Impact Assessment' (August 2012) considers the impact of the Conwy LDP as a whole on the Welsh language. It should be noted that the evidence base relies on 1991 and 2001 Census data.
- 5.6 An assessment has therefore been undertaken in line with the methodology set out in SPG 'LDP6: The Welsh Language' which takes into account more recent data from the 2011 and 2021 Census.

## Population characteristics

### 1. Is the proposal likely to lead to a population increase/decrease that might:

- Affect the balance of English/Welsh speakers (in a negative/positive way)?
- Lead to an absolute or proportional decline in the number of Welsh speakers?

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

- How will this impact on the number of Welsh speakers?
  - Would the change be permanent or temporary?
- 5.7 The development comprises 29 dwellings and based on an average occupancy of 2.29 person per household, the development will lead to a population increase of 66.41 persons in Llandudno.
- 5.8 The Conwy LDP Strategy identifies that, as a result of reducing household sized and projected net in-migration, there is a greater need for new housing in the County, in particular affordable housing. The application is submitted by two Registered Social Landlords (RSL's) and would deliver all units as affordable housing units to meet an identified need.
- 5.9 The application site is a previously developed site within a residential area within the development boundary of Llandudno which would contribute towards delivering the new housing required for the County as part of the LDP. Pre-application discussions with the LPA have confirmed that the principle of development is supported in principle at the site.
- 5.10 Llandudno forms part of the Urban Development Strategy Area in the Conwy LDP, which are identified as areas where most new development will take place. Around 85% of new housing will be directed towards the Urban Areas, which includes Llandudno. The CLIA of the Conwy LDP concludes that the spatial strategy for distribution of the LDP housing figures will not adversely affect the balance of Welsh and English speakers overall.
- 5.11 All units would be affordable units, providing a mix of one- and two-bed apartments and two- and three-bed dwellings. As the proposal is a residential scheme, any change that would be experienced would be permanent.
- 5.12 The Conwy Local Housing Market Assessment (LHMA) identifies that one- and two-person households will make up the majority of new households between 2021 and 2026. The proposal provides a mix of 93% one- and two- beds and 7% three-beds, which would seek to meet an identified need for these types of properties in Llandudno in terms of social rented units.

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5.13 The Conwy LHMA (2022) found there to be a significant shortfall in terms of social housing supply with Conwy's social rental sector contributing 11.6% of tenure types compared to 16.4% across Wales as a whole, representing the second lowest in the country. This has resulted in households who were eligible for social housing being unable to access it due to a limited supply in the area, forcing them into the private rent sector where costs are much higher.

5.14 Table 22 of the LHMA shows that over 50% of the social housing stock within the Conwy region is made up of three-bedroom properties, compared to just 16.3% of one-beds and 29.9% for two-beds. This significantly exceeds the proportion of three-bedroom properties across Wales at 44.2%.

Table 22 Social housing stock by number of bedrooms, March 2016 Source: social landlord stock and rents data, Welsh Government	Conwy County Borough		Wales
	Number	%	%
All general needs dwellings	4,370		
One bedroom	712	16.3%	17.6%
Two bedrooms	1,308	29.9%	35.7%
Three bedrooms	2,200	50.3%	44.2%
Four bedrooms	134	3.1%	2.3%
Five bedrooms or more	16	0.4%	0.2%

5.15 The proposed development would therefore provide much-needed social housing stock of one- and two-bedroom units where the proportion of housing stock within Conwy is lower than can be seen across Wales as a whole.

5.16 The social housing stock within the Conwy region is also dominated by general needs dwellings at 63.8%. The LHMA states that almost a third of non-general needs social housing is designated as either sheltered or extra care housing reserved for over 55s only, therefore further limiting the availability of social housing for families and households who are not eligible for older person's accommodation. The proposed development includes 6 x assisted living apartments and 3 x accessible apartments, all forming one-bedroom units.

5.17 The need for affordable housing in Llandudno was provided by CCBC Housing Strategy within the pre-application stage, outlined in Table 5.1.

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**Table 5.1 Affordable housing need in Llandudno**

	1 bed	2 bed	3 bed	4+ bed
Social rent	504	237	134	81
LCHO	6	75	34	6
Intermediate Rent	110	107	40	11
LCHO or Intermediate Rent	10	28	29	3

- 5.18 Evidently, the need for affordable housing in Llandudno is highest within the social rent sector, particularly for one-bed accommodation, followed by two-beds and three-beds.
- 5.19 The proposed housing mix, comprising of one-bedroom, two-bedroom and three-bedroom units will meet the identified need of Llandudno as a settlement, as well as the wider needs of the Conwy region as it will provide much-needed affordable housing stock, particularly of one- and two-bedroom property sizes where Conwy has a significantly lower proportion than Wales as a whole. The inclusion of accessible and assisted living apartments is also considered to be a welcome one to provide non-general needs accommodation which is not restricted to those over 55.
- 5.20 The development is considered to provide an appropriate housing mix based on the Conwy LHMA and the affordable housing register for Llandudno, complying with Policy HOU/5.
- 5.21 As all units are proposed as affordable units, they would be occupied by local people in need of affordable properties, which would not lead to any in- or out-migration of the area. These people are expected to be living in the community at present but cannot meet their need for a house.
- 5.22 Consultation Paper 1 'Priority Issues, Vision and Objectives – September 2018' for the Replacement Conwy Local Development Plan (RLDP) identifies that "slow population growth, negative natural changes (more deaths than births) and projected population ageing are likely to create issues for long term workforce replacement and to increase pressures on a range of public services. Out-migration of the early working age population in CCBC presents an issue with retaining its young adult population. As a result there is a need to ensure that the RLDP seeks to deliver the housing needs of an aging population, but at the same ensuring that new homes seek to retain younger population the area. The housing types (including adapted living), sizes and tenure set out in the LHMA should be promoted through the RLDP."

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- 5.23 Conwy LDP Background Paper 2: Population and Household Projections, identifies migration as the key component to Conwy County's population growth. Population totals would decline year on year if not for in-migration.
- 5.24 Conwy County Borough Council has surveyed occupiers of newly built housing, considering where people have moved from and the occupiers' characteristics, including Welsh language ability. The 'New housing occupancy study Conwy County Borough Council' (2018) (hereafter referred to as '2018 survey') found that 63.6% of respondents previously lived in Conwy County Borough before moving to their current property; 16.5% moved from elsewhere in North Wales and 19.9% from the rest of the UK.
- 5.25 The results of the 2018 survey provide a good indicator that the majority of people moving into new homes are already living in either Conwy or North Wales. Additionally in this case, all dwellings would be affordable units which would be occupied by local people who already live in the area.
- 5.26 The 2018 survey found that 62% of Welsh speaking households and 64.4% of non-Welsh speaking households moved from within Conwy County Borough. A further 27.8% of Welsh speakers moved from other areas of North Wales.
- 5.27 As the proposal relates to 100% affordable housing, the future occupiers are expected to come from Llandudno and the immediate neighbouring areas or Conwy county. This proposal would contribute towards meeting the housing need of the local people, enabling them to live in this local area.
- 5.28 The proposal has been brought forward to meet an identified need for affordable dwellings for individuals who are currently residing locally in Llandudno or surrounding areas. It will enable the existing population to remain locally, as opposed to out-migrating to find accommodation which meets their needs, which is affordable. Without the provision of affordable housing, local people who are unable to afford their own home could have no other choice but to leave the area.
- 5.29 The development is not considered to contribute towards out-migration from Llandudno or Conwy county as the development would deliver affordable housing types, which could enable the existing population (including young people), which have been continuously out-migrating from Conwy county, to stay in their local area.

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- 5.30 Overall, the proposal would be expected to have a neutral effect on population changes as it would serve local people, but it could lead to local people who may have left to return. However due to the scale of development at 29 units, it would not be a noticeable effect in terms of the Welsh language.
- 5.31 As all units would be affordable units for local people, no change is expected to the current balance of Welsh speakers and individuals with no ability in Welsh.
- 5.32 A neutral effect on the balance of Welsh speakers in Llandudno is expected as a result of the proposed development.

### **Overall effect**

- 5.33 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Additional mitigation/enhancement measures

- 5.34 In order to raise awareness of the Welsh language amongst non-Welsh speakers the following mitigation measures are proposed:
- All advertising of the development and communication should be bilingual;
  - All advertisements/signs erected as part of the proposed development should be bilingual (including during construction and marketing);
  - All marketing materials to be bilingual;
  - Provide a Welsh only name for the development/street names within the development; and
  - Notices provided within the development upon completions should be bilingual.

### **3. Is the proposal likely to lead to a changing age structure for the community area?**

- Could certain age groups leave or move into the area? Could traditional social networks be broken up?
- 5.35 The ability to speak Welsh differs between age groups. The ability to speak Welsh is most prevalent amongst those of school ages with 41% of 3-15 year olds in Conwy



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county able to speak Welsh. Those aged 50-64 and over 65 have the lowest proportions of Welsh speakers (19.9% and 19.4%) in Conwy county.

- 5.36 The Conwy LDP and RLDP acknowledges that the population of Conwy is ageing and therefore one of the LDP's priorities is to encourage the retention of younger people in their communities. The Conwy LDP seeks to do this, partially, by providing a choice of housing distributed across the areas of the Plan. In line with this, the proposal would provide a variety of homes to suit a range of needs.
- 5.37 The proposed units would be one- and two- bed apartments which would be expected to be occupied by single occupants, couples and smaller families and two- and three- bed dwellings suitable for families providing an appropriate mix of housing types. The provision of affordable housing would contribute towards providing opportunities for local people, including young people of working age to remain living in their local area.
- 5.38 This will also contribute towards balancing the age structure, which is currently ageing. A more balanced society will benefit the Welsh language and social cohesion.

### **Overall effect**

- 5.39 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Additional mitigation/enhancement measures

- 5.40 Based on the assessment, no additional mitigation is considered to be necessary

## **Quality of life**

### **4. Is the proposal likely to have an impact on the quality of life of the local people?**

- Might the proposal impact on the health and amenity of the community?
- Might it increase the risk of crime or violence in the community?

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- 5.41 During construction, the proposed development will result in some noise effects associated with a conventional construction site; however, those effects on nearby residential receptors are not expected to be significant. Additionally, it is expected that a condition would be attached to any permission granted requiring the submission and approval of a Construction Method Statement and Construction Traffic Management Plan, which would identify the proposed ways of working during construction, including working hours.
- 5.42 The guidance published by Welsh Government, Building Better Places, emphasises the importance of health and well-being moving forward from the Covid-19 pandemic. The guidance notes the importance of building homes that will last a lifetime and be made resilient and adaptable to future pandemics should they occur again. The importance of amenity space within our homes and home offices to allow for homeworking has become apparent, and it is expected that people working from home and more locally will be a long-term trend. The guidance states that moving forward, homes need to be “great places to live”.
- 5.43 The proposed dwellings will have good quality internal layouts, adequate circulation space and will be accessible, in line with this guidance. The proposal will also be constructed to a high quality and will be properly insulated and ventilated, providing conditions that are conducive to good health.
- 5.44 The site is located in close proximity to the sea front in Llandudno, providing access to a pleasant environment for recreational activities and is also located in close proximity to Llandudno Leisure Centre, Swimming Pool, Llandudno Football Club, Llandudno Rugby Union Club, Maesdu Park and a range of private gyms in the town which provide recreational facilities.
- 5.45 Natural surveillance would be provided through the orientation and layout of the development.
- 5.46 The proposed scheme complies with Policy DP/3 of the Conwy LDP which relates to sustainable development principles, design quality and reducing crime. This is considered in greater detail in the DAS.
- 5.47 There is no reason to believe that an adverse effect would arise in terms of crime and violence reducing the desirability to live in the community, which would affect the well-being of the Welsh language in Llandudno.

## Community and Linguistic Impact Assessment

5.48 Overall, the proposed residential development will positively contribute towards the quality of life of the occupiers of the development as well as the nearby community.

### Overall effect

5.49 Beneficial.

### Mitigation/enhancement measures

#### Incorporated measures

- Inclusion of design principles for reducing the likelihood of crime within site layout; and
- Compliance with Policy DP/3 of the Conwy LDP which relates to sustainable development principles, design quality and reducing crime.

#### Additional mitigation/enhancement measures

5.50 Based on the assessment, no additional mitigation/enhancement measures are considered to be necessary.

## Economic factors

### 5. Is the proposal likely to have a detrimental impact on local business and local jobs?

- Might it potentially lead to local Welsh speaking businesses closing down?
- Might it potentially create or threaten local jobs?

5.51 The proposal relates to a residential development within the development boundary of Llandudno on a brownfield site which lies within the Urban Development Strategy Area, being in an accessible and sustainable location, which includes a distribution of existing employment sites and retail provision.

5.52 Delivering residential development close to sustainable and accessible strategic hubs, such as Llandudno, where employment land is located, will support existing and new businesses which will assist local communities to prosper. This will contribute towards promoting and protecting a sustainable economy, safeguarding the future viability of existing and new businesses. This is an indirect, positive impact as a result of the development.

## Community and Linguistic Impact Assessment

- 5.53 The Welsh Government recognise the synergy between nurturing economic growth, jobs, wealth-creation and the well-being of the Welsh language<sup>10</sup>. Therefore delivering residential development within strategic hubs such as Llandudno, which includes a range of shops, cafes, public houses, theatre and tourist attractions as well as distribution of employment land, has the potential to contribute towards the synergy between the economy and the Welsh language.
- 5.54 The residential nature of this development means that the provision of long-term job opportunities are not anticipated to be a direct outcome. However, in the short term, the proposal will offer employment opportunities for those contracted to develop and build the scheme.
- 5.55 Construction and maintenance skills will be required during and after the development. The appropriate skills are to be found in the local area of Conwy where 28.4% of the population (aged 3 and over) working in construction were Welsh speakers in 2011<sup>11</sup> and 21.8% in 2021<sup>12</sup>. Therefore, it is expected that a high percentage of local companies will be able to communicate through the medium of Welsh.
- 5.56 The development is not expected to lead to any local businesses closing down. The site is located within walking distance to the wide range of facilities and services within Llandudno and it is expected that future residents would utilise these in their every-day lives.

### Overall effect

- 5.57 Beneficial.

### Mitigation/enhancement measures

#### Incorporated measures

- Local employment opportunities during the construction and maintenance phases of development;
- Potential for future development of services and facilities within the local area, which would lead to the creation of local jobs and businesses within the area;

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<sup>10</sup> Welsh Government. 2014. *A living language: a language for living – Moving forward Policy Statement*. [Online] Available from: <http://gov.wales/docs/dcells/publications/140806-living-language-moving-forward-en.pdf>

<sup>11</sup> NOMIS: Census 2011: Ability to speak Welsh skills by national identity by sex by age (DC2203WA) (percentages calculated by Cadnant Planning Ltd)

<sup>12</sup> NOMIS: Census 2021: Ability to speak Welsh by industry (RM149) (percentages calculated by Cadnant Planning Ltd)

## Community and Linguistic Impact Assessment

- Future residents would use and access existing local businesses, services and facilities within the local area.

### Proposed measures

5.58 Based on the assessment, no additional mitigation is considered to be necessary.

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

- Might it potentially lead to increased in-migration of non-Welsh speakers due to greater economic diversification?

5.59 As the development is for a residential development only, it is not likely to result in any significant impact on the economic diversity in the community or wider area.

5.60 Llandudno is identified as being within the Urban Development Strategy Area, where employment and housing developments is to be delivered as part of the Conwy LDP's economic strategy which will contribute towards promoting a more balanced and skilled age structure and a positive means to promoting and retaining a younger and more economically active population.

5.61 Delivering a residential development could positively contribute towards retaining the younger population of the county and those who are economically active by providing affordable housing for them to retain living locally.

5.62 The proposal would not be expected to lead to greater economic diversity in the community and therefore an overall neutral effect is identified.

### **Overall effect**

5.63 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Proposed measures

5.64 Based on the assessment, no additional mitigation is considered to be necessary.

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

- Might the proposal increase/decrease salary levels due to increased competition?
- Might it force local Welsh speaking people to leave the community due to house prices, or prevent them from returning?

5.65 The proposal is for housing, and therefore it not considered to have any impact on local wages or salaries.

5.66 The shortage of affordable housing to rent or buy is one of the greater challenges facing many communities in Conwy according to the Conwy LDP and RLDP. This together with limited opportunities for higher paid employment, makes it difficult for local people to access the housing market. Therefore, one of the key priorities of the Conwy LDP and RLDP is to increase the supply of affordable housing for local need (AHLN). All units would be affordable units, which would contribute towards this priority of delivering affordable housing. These would be provided as social rented properties managed by the applicants.

### **Overall effect**

5.67 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Proposed measures

5.68 Based on the assessment, no additional mitigation is considered to be necessary.

## **Infrastructure supply**

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

- Might the proposal threaten or secure local Welsh medium schools and/or health care facilities?

## Community and Linguistic Impact Assessment

- Might it threaten or secure local shops/post offices/banks/pubs in Welsh speaking communities, forcing certain sections of the population out of the area?
- 5.69 LDP Policy DP/5 states that where appropriate all new development will be expected to make adequate contributions towards new infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from the development or future maintenance and upkeep of facilities.
- 5.70 Pre-application discussions were undertaken with the Local Planning Authority regarding the proposed development scheme and the response provided details of financial contributions required towards an increase in demand for infrastructure as a result of the development. As part of this development, the developer is committed to providing the necessary contributions to mitigate the impact of the development on the local infrastructure within the area. This includes a contribution towards open space provision, waste and libraries.
- 5.71 The Welsh Government recognises that education has a crucial role to play in order to support the aspirations of a bilingual nation (Cymraeg 2050 A million Welsh speakers) and supporting the use of the language within communities. Therefore, safeguarding the future use of Welsh-medium schools and ensuring that there is sufficient capacity in Welsh-medium schools is considered to be very important to supporting the use of the Welsh language within communities.
- 5.72 Appendix 4 of the Planning Obligations Supplementary Planning Guidance (SPG) provides guidance on how to calculate the expected number of dependent children (aged 3-18) within a residential development, based on the number of bedrooms for each house and the occupancy rates detailed within the document.
- 5.73 Ysgol Morfa Rhianedd is the closest primary school to the site and is the only designated Welsh medium school in Llandudno.
- 5.74 Ysgol John Bright is the nearest secondary schools and lies around 100m to the south of the application site, being a predominantly English medium school.
- 5.75 Ysgol y Creuddyn is the nearest Welsh medium secondary school located in Penrhyn Bay, being a designated Welsh medium secondary school with significant use of Welsh.
- 5.76 In terms of the promotion of the Welsh language there are Authority-led initiatives in place to ensure that any non-Welsh speaking pupils that move into the development are given the opportunity to learn the language from a very young age.

## Community and Linguistic Impact Assessment

5.77 Pre-application discussions with the LPA did not indicate the need for a financial contribution towards primary and secondary education.

5.78 The proposal is not expected to have an unacceptable effect upon local infrastructure and service provision, therefore, it is considered that the proposed development will have a neutral effect. .

### Overall effect

5.79 Neutral

### Mitigation/enhancement measures

#### Incorporated measures

- Provision of necessary financial contributions to mitigate the impact of the development on the local infrastructure within the area.

#### Additional mitigation/enhancement measures

5.80 Based on the assessment, no additional mitigation/enhancement measures are considered to be necessary.

## Social and cultural aspects

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

- Might the proposal have a significant uneven effect on different parts of the local community?
- Might it violate traditional values of certain parts of the community?

5.81 Llandudno currently contains a proportion of both Welsh and non-Welsh speaking households and there are currently no social tensions between the balance of Welsh and non-Welsh speakers.

5.82 The proposal offers a mixture of house types including one- and two-bed apartments and two- and three-bed houses. The delivery of affordable housing would provide housing for local individuals, couples and families providing an opportunity for local people to remain in the area, including local Welsh speakers.



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5.83 As all dwellings would be occupied by local people already living in Llandudno and the immediate areas, given that there are currently no social tensions between the local population, there is no reason to believe that the proposed development will lead to any tensions, conflict or serious divisions with the Welsh speaking community..

### **Overall effect**

5.84 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Proposed measures

5.85 Based on the assessment, no additional mitigation is considered to be necessary.

## **10. Will the proposal potentially lead to changes in local Welsh traditions/culture?**

- Might the proposal force local members of local voluntary/activity/youth groups out of area due to unemployment/high house prices?

5.86 Providing a range of affordable housing will provide an opportunity for local people, which includes a percentage of Welsh speakers, to remain in their local community.

5.87 Providing opportunities for the local population (which includes a proportion of Welsh speakers) to remain in their local area, will help retain those populations who are active members of local voluntary/activity/youth groups such as Yr Urdd, Cylch/Mudiad Meithrin, Merched y Wawr/Clybiau Gwawr Welsh Choir and community groups. Welsh traditions and culture are often built upon social and cultural networks, such as these groups, participation in which is through the medium of Welsh.

5.88 As stated previously in this report, the proposed housing mix of one- and two-bed apartments and two- and three-bed houses to meet an identified need locally for housing, which includes addressing the need for a cross-section of the community.

5.89 As all dwellings are proposed as affordable dwellings, future occupants are expected to be already living in the local community and therefore no impact on local Welsh traditions and culture are expected.

**Overall effect**

5.90 Neutral.

**Mitigation/enhancement measures**

Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

Proposed measures

5.91 Based on the assessment, no additional mitigation is considered to be necessary.

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

- Might the proposal lead to less use of Welsh language in the community? Reasons for this: Welsh speakers is less of a %, language change in specific social networks, lack of Welsh services provision in light of the development, education, child care etc.
- Is the proposal likely to lead to more use of the Welsh language in the community?

5.92 Evidence shows that there is a strong correlation between the viability and survival of a language and the existence of geographical areas where that language is predominant. A high density of speakers is also required for Welsh to be an everyday language of a community (Welsh Government, 2014).

5.93 The density of the Welsh speaking population is key to prosperity of the language and this is reflected by community activity through the medium of Welsh. Community and cultural activities within a local area contribute towards the value of the language and also create a feeling of belonging to a community or area (hunaniaith, 2014).

5.94 The application lies within the development boundary of Llandudno where the proportion of Welsh speakers in 2021 was 17.3%. Whilst the Welsh language is considered to be used by a proportion of the community of Llandudno, it is not considered to be the everyday language of the community, as it has long been argued that a 70% proportion of the population density of speakers is required in order for Welsh to be an everyday language of the community (Welsh Government, 2012). The proportion of Welsh speakers in Llandudno is significantly lower than the 70% considered to be necessary for Welsh to be the everyday language of the community.

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- 5.95 However, as previously mentioned in question 10, in Conwy there is provision of Welsh-medium social opportunities which promote the Welsh language and culture within the community, such as Yr Urdd, Merched y Wawr and Cylch/Mudiad Meithrin.
- 5.96 As all dwellings would be affordable dwellings, all dwellings are expected to be occupied by local people who are already living in the local community. It would enable local people to meet their housing need, enabling them to remain living locally.
- 5.97 Overall, it isn't considered that the proposed development will have a detrimental impact on the proportion of Welsh speakers in Llandudno and therefore the use of the Welsh language within the community. .

### **Overall effect**

- 5.98 Neutral.

### **Mitigation/enhancement measures**

#### Incorporated measures

- Delivery of 29 affordable dwellings to meet an identified need.

#### Additional mitigation/enhancement measures

- 5.99 Whilst a neutral effect is identified, the following measures are proposed to raise awareness of the Welsh language in the community.
- All advertising of the development and communication should be bilingual;
  - All advertisements/signs erected as part of the proposed development should be bilingual (including during construction and marketing);
  - All marketing materials to be bilingual;
  - Provide a Welsh only name for the development/street names within the development; and
  - Notices provided within the development upon completions should be bilingual.

## Overall Impact Assessment Index

	Base Index Score	Dimensional Index Score	Overall Base Index Score
<b>Population characteristics</b>			+0.18
Q1	0	0	
Q2	0		
Q3	0		
<b>Quality of life</b>			
Q4	+1	+1	
<b>Economic factors</b>			
Q5	+1	+0.33	
Q6	0		
Q7	0		
<b>Infrastructure supply</b>			
Q8	0	0	
<b>Social and cultural aspects</b>			
Q9	0	0	
Q10	0		
Q11	0		

5.100 The overall effect of the development is positive on the community and the Welsh language. However, the assessment identifies incorporated measures which already form an integral part of the proposed scheme together with additional mitigation/enhancement measures which are considered to be necessary to make the proposed development acceptable.

## 6. Conclusion and proposed mitigation and enhancement measures

- 6.1 The proposal relates to a residential development of 29 affordable dwellings on behalf of two RSL's to provide a mixture of one- and two-bed apartments and two- and three-bed dwellings on a previously developed site within the development boundary of Llandudno. The proposed dwellings would meet an identified need for social rented housing units in Llandudno to meet the needs of local people. The proposed housing mix is supported by the Housing Strategy section of Conwy County Borough Council.
- 6.2 By virtue of the nature of the proposed development, it is not anticipated that the proposal would result in change to the local population in a way which could negatively effect upon the Welsh language characteristics of the area of Llandudno as the dwellings would meet the needs of local people who are already living in the community.
- 6.3 When considering the overall effect of the proposed development on the Welsh language in Llandudno, an important consideration, is the effect on the proportion of Welsh speakers.
- 6.4 The site lies within the development boundary of Llandudno in a residential area close to a wide range of local services and facilities where 17.3% of the population spoke Welsh in 2021. As future residents are expected to be already living in the local community, no change in the proportion of Welsh speakers in Llandudno is expected.
- 6.5 On balance, the development is not expected to have a detrimental effect on the proportion of Welsh speakers in the community of Llandudno but would provide a beneficial effect in terms of enabling local people to meet their housing need and remain living in their local communities.

### Summary of mitigation/enhancement measures

#### Incorporated measures

- 6.6 The following are a summary of the embedded mitigation which forms an integral part of the proposed development:
- Delivery of 29 affordable dwellings to meet an identified need; and
  - Local employment opportunities during the construction and maintenance phases of development.

## **Proposed additional mitigation/enhancement measures**

6.7 As a result of the assessment presented in Section 5, the following are measures which are considered to be appropriate to mitigate negative and enhance positive effect of the development:

- All advertising of the development and communication should be bilingual;
- All advertisements/signs erected as part of the proposed development should be bilingual (including during construction and marketing);
- All marketing materials to be bilingual;
- Provide a Welsh only name for the development/street names within the development;
- Notices provided within the development upon completions should be bilingual; and
- Provision of necessary financial contributions to mitigate the impact of the development on the local infrastructure within the area.

# CADNANT

PLANNING

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