



Local Development Plan 2018 – 2033

Preferred Strategy: Consultation Form

Comments are encouraged via the Council's website www.conwy.gov.uk/spps/consultations using the on-line form available. Using the online form ensures that your comments are registered and you receive updates.

Conwy County Borough Council would like to hear your views on the Replacement Local Development Plan (RLDP) 2018 – 2033 Preferred Strategy. The Preferred Strategy is supported by 12 Topic Papers and 47 Background Papers. We are consulting on this document from **29/07/2019** to **20/09/2019**. All consultation documents are available on the Council's website, and copies are available for inspection during normal opening hours at Conwy's Council offices and libraries.

Once completed, please return your comments form to:

Strategic Planning Policy Service
 Conwy County Borough Council
 PO Box 1, Conwy, LL30 9GN
 Email: cdll-ldp@conwy.gov.uk
 Website: www.conwy.gov.uk/rldp

Please contact the Strategic Planning Policy Service if you require further information and advice by emailing cdll-ldp@conwy.gov.uk or contact us by phone on: 01492 575461

All comments received will be made publicly available and reported to Cabinet and Council as part of the report back on the consultation. Please continue on separate paper for each question if required.

Your contact details will not be released to any third parties and will only be used for the purposes of Conwy's Local Development Plan process. Please note that your name, comments, and your address will be made publicly available. In order to comply with data protection legislation, email addresses will not be released.

Petitions are sometimes used by groups to offer their opinions on an issue. The petition should clearly state on each page the purpose of the petition, and should have a contact name/ address/ e-mail. Correspondence would be directed to this contact; individual acknowledgements will not be sent to all signatories of the petition.

Local Development Plan 2018 – 2033 Preferred Strategy: Contact Details and Summary Comments

	Personal Details	Agent Details (If Applicable)
Name:	Sharon Perry	Click here to enter text.
Organisation (If Applicable):	Click here to enter text.	Click here to enter text.
Address:	9 South Street Llanfairfechan	Click here to enter text.
Postcode:	LL33 0RF	Click here to enter text.
Telephone No.:	Click here to enter text.	Click here to enter text.
Email:		Click here to enter text.

Do you wish to be kept informed regarding future stages of the Plan's preparation?	Yes
Preferred means of contact	Email
Do you wish to correspond in English or Welsh?	English

Please provide a summary of your comments below (maximum of 100 words). It is important that a summary version is provided in order to register your comments

Summary Comment (maximum 100 words):

I object to the proposed development of 400 new houses at Cae Ffynnon, Llanfairfechan for the following reasons:

- The scale of growth identified in the Strategy is excessive and unjustified to meet the needs of Llanfairfechan.
- Such a development will significantly harm Llanfairfechan's character, biodiversity, and landscape.
- The Preferred Strategy fails to demonstrate whether Llanfairfechan has or is

capable of delivering the necessary infrastructure to support this development.

- There is no evidence of such a large housing need in Llanfairfechan.

Instead greater emphasis should be placed on a lower level of growth that supports existing community infrastructure and natural *local* population change.

Local Development Plan 2018 – 2033 Preferred Strategy: Vision and Objectives

The Preferred Strategy is formed on evidence base gathering and an understanding of the issues impacting on Conwy. These have informed a new Vision and 15 Objectives.

Do you have any comments to make on proposed Vision and Objectives?
Please comment below

Click here to enter text.

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Preferred Strategy: Proposed Level of Growth

The Preferred Strategy will make provision for a level of growth comprising of 12 – 14 ha of employment land to accommodate a forecasted 1,800 new jobs. This will be supported by land for 5,150 new homes.

Do you have any comments to make on proposed levels of growth?
Please comment below.

Click here to enter text.

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The Preferred Strategy will focus development in the more sustainable and serviced Urban Settlements and Tier 1 Villages within the Coastal Development Strategy Area (CDSA) and Key Service Centres within the Rural Development Strategy Area (RDSA). More limited local growth and diversification will be promoted in other lesser service settlements. The Preferred Strategy also proposes a new Eastern Regeneration and Improvement Area (EIRA) to recognise the high level of constraints (e.g. flooding) within the east of the County Borough.

Preferred Strategy: Proposed Spatial Strategy

Do you have any comments to make on the proposed spatial strategy? Please comment below:

[Click here to enter text.](#)



Local Development Plan 2018 – 2033 Preferred Strategy: **Strategic Policies**

The primary aim of the Preferred Strategy is to contribute to Sustainable Places in Conwy. This is supported by four overarching sections and draft Strategic Policies as detailed below in the diagram

Sustainable Places in Conwy

Sustainable Placemaking in Conwy

Sustainable Placemaking, Levels of Housing Growth, Levels of Jobs Growth, Growth Distribution & Hierarchy of Settlements, Placemaking & Good Design, Promoting Healthier Places, The Welsh Language, Sustainable Management of Natural Resources, Placemaking in Rural Areas, Place Plans, Strategic Sites, Infrastructure & New Development and Managing Settlement Form

Prosperous Places in Conwy

Economic Development, Tourism, The Rural Economy, Transportation Infrastructure, Telecommunications, Energy and Minerals & Waste

Healthy & Social Places in Conwy

Sustainable Transport & Accessibility, Housing, Retail & Commercial Centres, Community Facilities and Recreational Spaces

Natural and Cultural Places in Conwy

Landscape, Coastal Areas, Historic Environment, Culturally Led Regeneration, Green Infrastructure, Biodiversity, Water, Air, Soundscape & Light and Flooding

Do you have any comments to make on the proposed Strategic Policies? Please comment below.

The proposed development at Cae Ffynnon, Llanfairfechan actually conflicts with many of those Strategic Policies, as follows:

Conwy's Empty Homes Strategy (<https://www.conwy.gov.uk/en/Resident/Housing/Local-Housing-Strategy/assets/documents/Empty-Homes-Strategy-November-2011.pdf>)

- **Empty buildings should be repurposed before new homes are built:** There are a number of empty buildings in the town that could be repurposed as homes, such as the old Co-op, and presumably the old schools if the new school is built.
- This development contradicts Conwy's Empty Homes Strategy which states "*Empty dwellings in the private sector housing stock are a major issue in Conwy, as in many other parts of the UK. In spite of fluctuations in the fortunes of the housing market, the number of long term empty dwellings in the county remains fairly consistent at approximately 1000. Some of these properties are in good condition, whilst others are uninhabitable and deteriorating further.*" If Conwy Council used some of repurposed these empty homes, then there would be no need for new housing stock.

Conwy's Green Wedge Assessment

(https://spp.conwy.gov.uk/upload/public/attachments/518/BP12_Green_Wedge_Assessment.pdf)

- The Green Wedge Assessment aims to "*assist in safeguarding the country from encroachment*" and to "*protect the setting of an urban area*". The proposed development at Cae Ffynnon is in direct opposition to this statement.
- The fields at Cae Ffynnon are an essential green belt, with mature woodland.
- The Green Wedge Assessment also states that it will "*assist in urban regeneration by encouraging the recycling of derelict and other urban land*", so why aren't such areas in the county being assessed for new housing developments instead using of virgin farmland?

Are there any other policies that should be included? Please comment below.

Click here to enter text.

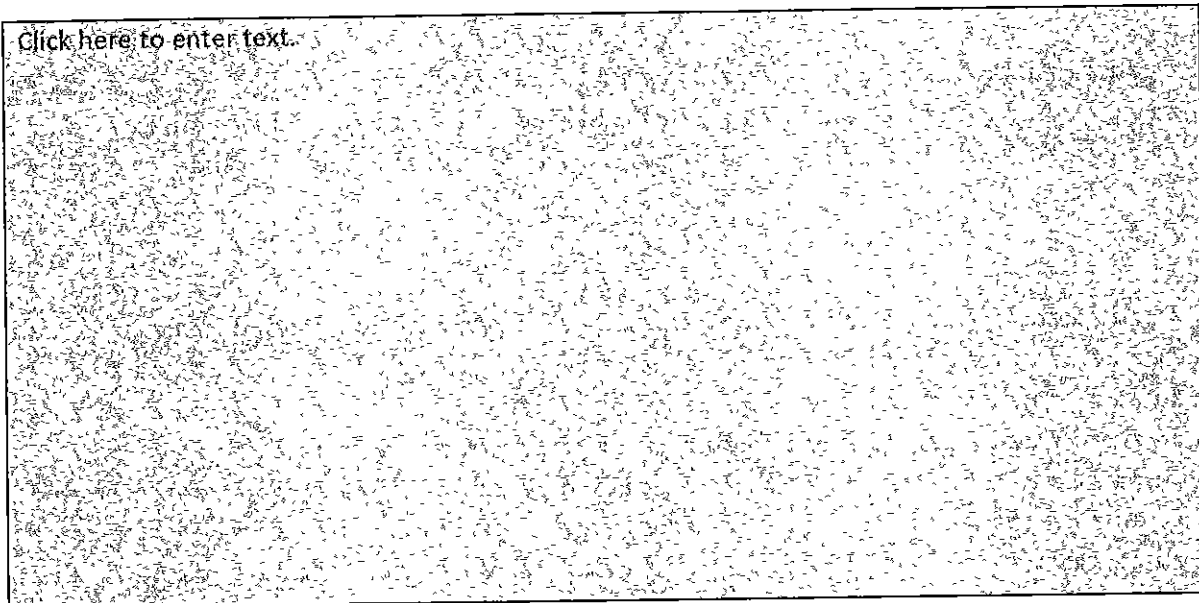
Preferred Strategy: Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA)

Do you have any comments to make on the Sustainability Appraisal (SA)? Please note that summary versions are provided on the Council's website. Please comment below:

Click here to enter text.

Do you have any comments to make on the Habitats Regulations Appraisal (HRA)?
Please comment below:

Click here to enter text.



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Preferred Strategy: **Candidate Sites Register**

If you wish to comment on any of the proposed Candidate Sites please do so below.
All comments should include the reference number of the particular site they refer to.

The development is not environmentally friendly

The proposed development of 400 new houses at Cae Ffynnon, Llanfairfechan will result in:

- **Loss of countryside:** The fields at Cae Ffynnon are an essential green belt, with mature woodland. There the development will result in loss of outstanding countryside, which has mental and physical benefits for the town, visitors, and County.
- **Threat to tourism:** Building these houses would take away the vital green space that, along with the coastline, makes Llanfairfechan the "Gem of North Wales"
- **Harm to biodiversity:** Such a development may significantly harm Llanfairfechan's biodiversity. For example, we have *Tyria jacobaeae* in Llanfairfechan, which is listed in the *Environment (Wales) Act 2016 Section 7 – list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales*. Therefore, the proposed development area may well contain other species that are protected by the Environment (Wales) Act:
<https://www.biodiversitywales.org.uk/Environment-Wales-Act>.
- **Lack of sustainability:** Such a development is unlikely to be built in a sustainable or environmentally-friendly way as there is no mention of solar panels, the ability to generate it's own energy, or reduce waste.
- **Increase in pollution:** As there are very few employment opportunities in the town, most people will have to commute outside of the village by car. This is not environmentally friendly or sustainable. Such a development should be built nearer the economic centres of the County.
- **Limited public transport options:** We only have a limited train service at Llanfairfechan. For example, there is only one train at 08:28 for people for need to be in work at Bangor by 09:00 wishing to take the train to Bangor. It's impossible to do this if you work in Llandudno (08:09 to Llandudno Junction. Wait for connection and arrive in Llandudno at 09:26.

The size of the development is excessive

The allocation of 400 dwellings is excessive. If we take an average of 3 people per dwelling, this equates to 1200 extra people in a town of 3637, (at 2011 census) resulting in a population of 4837. This represents a 33% increase in the town's population, which it currently doesn't have the infrastructure to cope with.

- **Increased traffic:** There is likely to be a 33% increase in traffic in the town, which has limited parking and narrow streets (where parking is allowed) from the main crossroads at Aber/Penmaenmawr Road and Station Road
- **Increased pressure on sewerage and water systems:** Does the Council know that Llanfairfechan's sewerage and water systems will be able to accommodate 400 new homes without loss of water pressure and sewerage capacity?
- **Increased pressure on already stretched health services:** It is already difficult to get

an appointment at the doctor's surgery, due to the difficulty in recruiting new doctors to the BCUHB (Betsi Cadwaladr University Health Board). The surgery at Penmaenmawr closed because of this, so now the Llanfairfechan surgery covers Penmaenmawr, Llanfairfechan, and Dwygyfylchi, serving a population of around 8000.

- **Lack of additional community resources:** Other than a couple of token gestures, no additional community infrastructure has been included in the development of the estate. For example, for an estate of that size, there is no community centre or small shop.

The location of the development is inappropriate

The location is inappropriate both in terms of the town and the County.

- **Risk of urban sprawl:** The proposed development would create a precedent for urban sprawl and would affect the visual amenity of the open countryside and lead to the removal of strategic landscape features, which may be harmful to nature conservation and to the setting of the nearby Conservation Area.
- **Flood risk:** There is always a lot of run-off from the fields onto Aber Road after heavy rain. This development may increase that run-off or inadvertently direct into other areas, such as Bryn Castell.
- **Planning permission has already been refused:** Planning permission for a smaller development on this site has already been refused (See http://spp.conwy.gov.uk/E_MINUTES/e_post2002/e_regulatory/e_planning/e_reports/25-34178.pdf). Also attached at Appendix 1.
- **Location is outside the settlement boundary and located within a Landscape Conservation Area:** The development site is located outside the visible settlement boundary of Llanfairfechan. The development will have an unacceptably adverse visual impact on the open character of the countryside, lead to uncontrolled sprawl of the settlement beyond its natural visual boundaries and set a precedent for further similar development.

There is no need for such a large development in Llanfairfechan

There are currently 48 properties for sale in Llanfairfechan, of which 10 are under £150,000. Whilst there is a need for a small number of affordable homes in Llanfairfechan, the proposed development is excessive.

- **New homes are still lying empty:** Glan View (Penmaenmawr Road) was built in Spring 2018. However, some of the properties in this development are still unsold well over a year after being built.
- **No need for such a large development for local people:** A development which increases a town's size by 33% is excessive. And it is extremely unlikely that a third of

the town's current population of 3637 are homeless.

- **The target audience is unspecified:** If the local people do not need so many homes, then where will over 1000 people be coming from?

Negative impact on the town's culture

A development of this size in a predominantly Welsh speaking part of the County will have a detrimental effect.

- **Impact on Welsh language:** A development of this size will adversely affect the Welsh language and the culture of the town.
- **Impact on heritage:** The look and feel of the town will be diluted. Llanfairfechan has a number of architecturally important buildings designed by Herbert Luck North. An estate of cheaply built red-brick houses of this size will dilute the town's heritage.

No economic benefit to the town

Apart from Bryn-y-Neuadd, there is no major employer in the town, therefore there is no clear economic reason why people would want to come to Llanfairfechan. The nearest economic centres are Bangor (10 miles) and Llandudno (13 miles) away.

- **Risk of becoming a dormitory town:** As there are limited employment opportunities in the town, Llanfairfechan is at risk of becoming a dormitory town for Bangor, Llandudno, and Colwyn Bay. This will lead to money being spent in the larger centres and not in the town.
- **Potential loss of agricultural land:** Using prime farmland for 400 new homes could be a loss for the town, county, and nation as a whole if, due to the current national political situation (Brexit), Wales needs to produce more of its own food.
- **There are no additional benefits to the town from this development:** The benefits will mostly be gained by those outside of Llanfairfechan: the land owner, builder, and Conwy Council. The town will not benefit economically, socially, or culturally from such a large development. In fact, it is likely to be detrimental (see all the reasons above). The proposed new school is not considered a benefit as it simply replaces what we already have.

The location of the proposed new school is inappropriate

The location of the proposed new school on the western fringes of the town is inappropriate culturally, environmentally, and socially.

- **The school is outside the town settlement boundaries:** Locating the new school outside of the town centre will rip the heart out of the village.
- **Harder for people without transport to access:** The proposed new school will be much further away for those who live at the eastern end of the village and if the proposed removal of the A55 roundabout goes ahead, it's unlikely that there will be any buses to/from Pendalar (as there will be nowhere for them to turn around).

know that some children in the poorer areas of the town can't attend secondary school because their parents can't afford to send them.

- **School size may be inappropriate:** There is no information about the capacity of the new school. Therefore, it feels like a sweetener from the Council and the builders and may not, in the end, provide the extra capacity required.
- **Increase in pollution, obesity levels, and climate change:** If there insufficient public transport to a school located at the fringe of the town, most children will be taken to school by car (where families do have cars) thereby increasing pollution, reducing exercise, increasing obesity levels, and contributing to climate change.

The development conflicts with Conwy Council's own strategies

The development at Cae Ffynnon conflicts with several (if not more) of Conwy Council's own strategies.

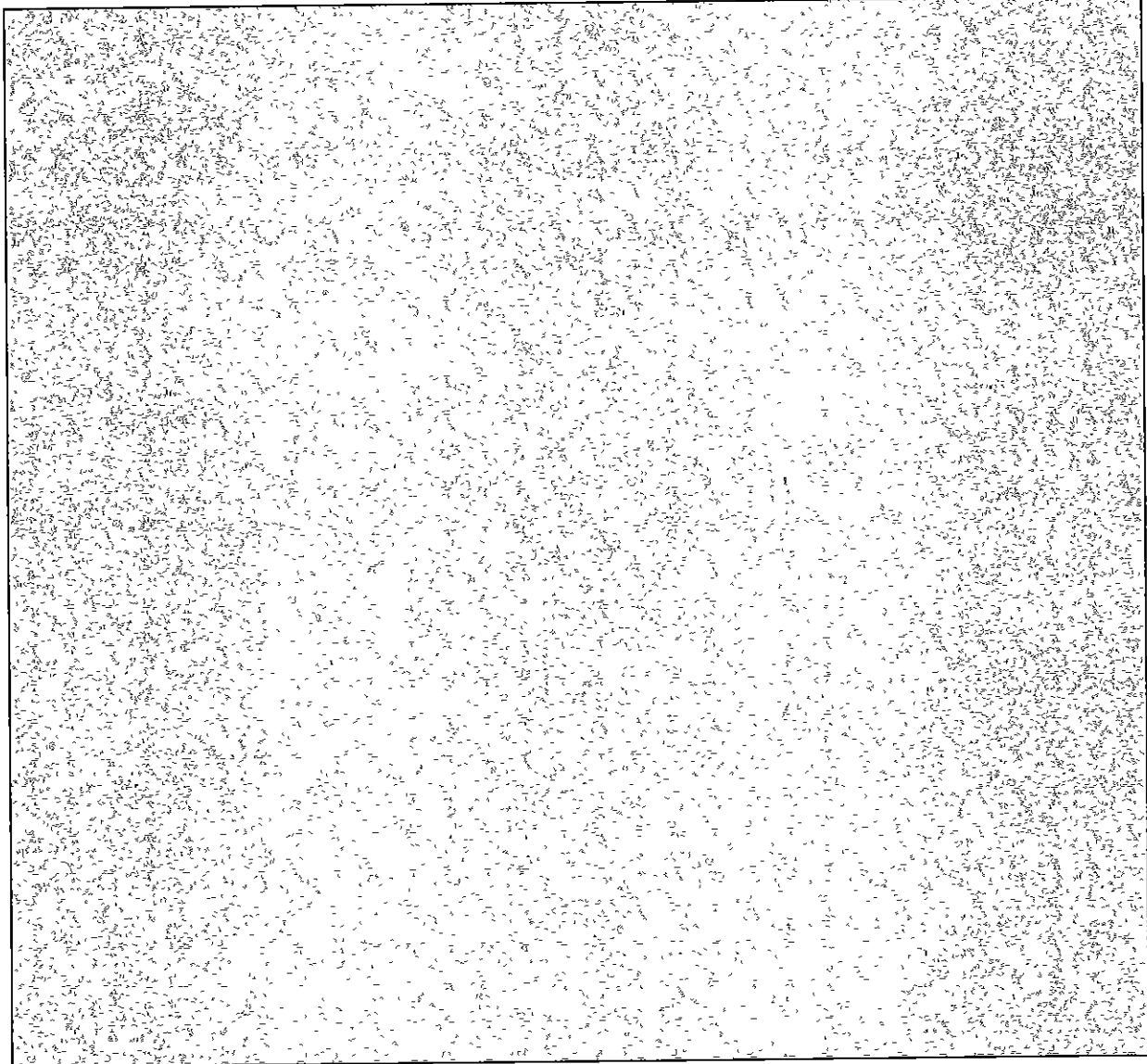
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Preferred Strategy: **Any Other Comments**

Are there any other comments that you would like to make on the Preferred Strategy? Please comment below

It is incredibly difficult to navigate all this information. The Preferred Strategy is incredibly badly written with multiple duplications of information. This very much seems like a smoke and mirrors exercise, with the salient points hidden in a vast mountain of repetition.

The system for commenting is deeply flawed and ensures that only people with the time to trawl through a mountain of information will actually be able to comment. Even this Word document with it's protected form controls is difficult to input into.

When you ask questions on this form about the various parts of the Strategy, it would be very helpful to include page numbers, links or references to the documents you'd actually like us to comment on.

Local Development Plan 2018 – 2033 Preferred Strategy

Thank you for your comments on the Preferred Strategy

If you have any further questions or require any assistance, please do hesitate to contact the Strategic Planning Policy Service on. 01492 575461 or email. cdll-ldp@conwy.gov.uk

See the Council's website for information on where to view the Preferred Strategy and for a list of drop-in sessions being held throughout the County Borough.

Comments must be received by 5pm on 20/09/2019

Comments made after this time may not be considered.

CODE NO. 0/34178
EXPIRY DATE: 9TH JANUARY 2008
APPLICANT: R JONES A'I FAB
PROPOSAL: RESIDENTIAL DEVELOPMENT (OUTLINE APPLICATION)
SITE: LAND OFF CAERFFYNNON ROAD, LLANFAIRFECHAN,
CONWY, LL33 0HP

RECOMMENDATION

- (A) *Minded to refuse planning permission*
- (B) To authorise the Head of Planning Services to determine the application under delegation

SITE / LOCATION

1. The application site is 0.8 ha in area and forms part of a larger agricultural field to the south west of Llanfairfechan. Visible from Bangor Road to the west and the historic garden of Bryn Y Neuadd beyond, the site is separated from Cae Ffynnon Road to the north east by a strip of mature trees and a stone wall. Cae Ffynnon Road forms the boundary of the Llanfairfechan Conservation Area at its junction with Bangor Road; however, the designation does not include the Council's nursing homes Argoed, Plas Y Llan and Bryn Castell opposite the site to the north. The Conservation Area designation continues along Cae Ffynnon Road to the east of the site where a denser wooded area forms the eastern boundary of the site

PROPOSALS

2. The application seeks outline consent for residential development, all matters have been reserved for subsequent approval. An indicative plan has been provided showing the access being formed off Cae Ffynnon Road opposite Argoed nursing home flats; the drawings also show a landscape buffer zone around part of the boundary and an area of public open space

SUPPORTING INFORMATION

3. This application is a resubmission of an application which was refused by Planning Committee in November 2006, a decision notice was subsequently issued with the following reasons:

No 1 The application site is located outside the visible settlement boundary of Llanfairfechan within open countryside, with no essential workers dwelling justification, no rural affordable needs exception justification or any other acceptable justification for the development on previously undeveloped agricultural land within a Landscape Conservation Area. The development would have an unacceptably adverse visual impact on the open character of the countryside, lead to uncontrolled sprawl of the settlement beyond its natural visual boundaries and set a precedent for further similar development. The proposal is, therefore, considered to be contrary to Gwynedd Structure Plan Policies A3, A6, D3 and D5 and to Planning Policy Wales (2002) paragraph 2.7.1 and TAN2.

No 2 The development site is agricultural land grade 3 as defined by the Agricultural Land Classification and insufficient information has been submitted to establish whether land is

grade 3a or 3b to enable this Authority to consider the loss of land of high quality. As such the proposal is currently contrary to Gwynedd Structure Plan Policies A3 and D7, Planning Policy Wales (2002) paragraph 2.8 1 and TAN6.

No 3: The proposal would adversely affect existing trees, lead to works to a stone wall, natural boundary form of Llanfairfechan along Cae Ffynnon Road and lead to works to facilitate an access to highway standards which, cumulatively, would lead to the loss of natural landscape, be to the detriment of visual amenity, adversely affect the Landscape Conservation Area and the setting of the nearby Llanfairfechan Conservation Area, contrary to Gwynedd Structure Plan Policies A3, D3 and D26 and Planning Policy Wales (2002) paragraphs 5.2.8 and 5.5

4. The applicant has submitted a statement which assesses the reasons for refusal, this includes

- There is no settlement limit for Llanfairfechan in any policy document. Relying upon a so called visible settlement limit is entirely specious. No proper consideration was given to the need to make exceptions for housing land.
- The views of the Welsh Assembly were not heeded at consultation necessitating the instruction of agricultural consultants who has demonstrated that the land is 3b and is of no agricultural significance. There are no landscape or biodiversity issues either for this improved farm land.
- Refusal reason number 3 is made weight and has been arrived at following an incomplete consideration of all the issues involved. The site will not change the character of a road or affect the village behind it.
- The only real reason for refusing this application was that the Council does not want the site developing. No other accessible sites existing though. The Council's position suggests arbitrary rationing of planning permission, contrary to the duty to deal with each application on merits in the wider round.

5. The information submitted by the agent also includes:

- The site benefits from a range of services
- There are no statutory landscape designations affecting the land
- No woodlands are being affected.
- Recent reports point to Llanfairfechan/Aber being the central location for a possible new local prison with the prospects of up to 230 jobs during the construction phase and 480 jobs when the prison is open. The economic implications would therefore be considerable and the immediate consequences for housing requirement in the area of Llanfairfechan would be very significant. This is not a case of housing sprawl.
- The Housing Land Availability situation is in a state of flux. Housing land should now be brought forward.
- The site scores highly in an analysis of the site accessibility
- It is situated within 200 metres of the core centre
- The applicant is willing to enter into discussion to provide an element of affordable housing provision
- The application is also supported by an agricultural land classification
- Agricultural land – The Grade 3B land take is less than 20 hectares. It does not raise issues for loss of agricultural land. No cumulative land take implications arise
- The land is subject to urban fringe farm difficulties at present – trespass, vandalism etc and development would frame a new edge to the land to allow for effective farming of the remainder free of trespass.
- The site itself can accommodate a well designed compact and low environmental impact housing scheme as a case of modest settlement expansion and completion.

PLANNING HISTORY

- 6 0/32335 – Residential development (outline application) - refused November 2006.

CONSULTATIONS

7. a) Llanfairfechan Town Council – Objection – Outside the settlement boundary and visually intrusive location from the main road As the proposal would breach national planning policies on development in the countryside it cannot be justified on the basis of housing land supply. Effect on the setting of Bryn y Neuadd and Conservation Area
- b) National Assembly for Wales, Agriculture Department – It is difficult to fully validate the applicant's survey without a site visit to check topsoil stone contents (which seem to have been estimated) A field validation is recommendation if ALC grading at this site is critical
- c) Wales and West Utilities – No objection.
- d) Ramblers – Objection – Site is on green open land outside the urban area and will have a significant detrimental effect on the landscape locally
- e) Environment Agency – No objection.
- f) Countryside Council for Wales – Request that a species survey is undertaken
- g) Welsh Water – No objection subject to conditions
- h) Head of Highways and Transportation (CCBC) – Response awaited
- i) Housing (CCBC) – There is evidence of housing need in the Llanfairfechan area.
- j) Senior Countryside Officer (CCBC) – No response received.
- k) Policy (CCBC) – The application site is outside the built up area of Llanfairfechan and is outside the settlement boundary that was proposed in the draft UDP. The application is contrary to policy.
- l) Landscape Officer (CCBC) –Objection - The existing land use provides a rural setting, incursion into open countryside. The proposed landscape buffer would not satisfactorily ameliorate the unacceptable visual impact of the proper development in views looking on from the north east from the old Bangor Road on the approach to Llanfairfechan. No visibility splays are shown, even though they were identified previously this scheme conflicts with a mature beech and sycamore growing in the existing woodland, loss of adjacent woodland
- m) Conservation (CCBC) – No response received
- n) Environmental & Technical Services (CCBC) – Soil percolation tests should be provided.

REPRESENTATIONS

8. The application was advertised by means of press, site and neighbour notice. No letters of representation have been received

PLANNING POLICIES

- 9 Planning Policy Wales (2002)

Ministerial Interim Planning Policy Statement - Housing

Technical Advice Notes (TAN):

TAN2: Affordable Housing

TAN6. Agricultural and Rural Development

TAN18 Transport

Gwynedd Structure Plan Policies:

A1, A2 and A3 – Housing

A6 – New Dwellings in the Countryside

D3 – Landscape Conservation Area

D5 – *Development Outside Settlements*

SP1 – Strategic Policy regarding Development of Settlements

PLANNING CONSIDERATIONS

- 10 An assessment of the applicant's case in favour of approving the site is considered below in respect of the previous refusal reasons

Refusal Reason Number 1

- 11 This current application now proposes a larger landscape buffer zone in an attempt to minimise the visual impact of the proposed development. The agent is correct in stating that there is no defined settlement boundary in the extant development plan but it is clear that Caer Ffynnon Road forms the edge of the urban settlement and to the south of this road this is very little development. A settlement boundary was defined in the draft UDP and this site is outside of it. The application site is clearly situated within the open countryside.
- 12 In light that there is a housing land availability shortage paragraph 5.1 of Technical Advice Note 1 indicates that weight should be given in dealing with planning applications providing the development would otherwise comply with national planning policies. However it is considered that the site in this open countryside location carries significant weight and would be unsuitable for housing development even though there is a shortfall of housing land supply in the County as a whole.
13. No essential workers justification is suggested by the applicants the agent raises a number of issues and also refers to the reports relating to a new prison and the economic demand and need for more houses in the area that this would create. This is purely speculative and is not *considered sufficient justification to override policy objections to the proposal which would cause intrusion into the open countryside to the detriment of its visual amenity.*
- 14 It is considered that the reason for refusal should still stand

Refusal Reason Number 2

- 15 The application has been submitted with an Agricultural Land Classification (ALC) assessment and although the National Assembly is not a statutory consultee in this instance as the site is under the 20 hectare threshold it has been consulted in order to ascertain the grade of the land. The applicant's study claims that the land is 3B which is a lower grade land. National Planning Guidance states that considerable weight should be given to protecting land in grade 1,2, 3a and it should only be development if there is an overriding need for the development etc ,
- 16 A desktop study has been carried out by the National Assembly who indicate the background and survey information suggests an ALC grading of subgrade 3b is very likely but a field validation (to check gradients and topsoil contents) is recommended if ALC grading at this site is critical. A copy of the response has been sent to the agent who has responded indicating that all matters dealing with the ALC grading have been properly attended to during the site visits. The grading of 3b is the correct finding of fact. Little weight should be placed on the WAG study as this desk top study would have been carried out from their Office. The applicant's ALC study was carried out by an independent ALC consultant who has detailed knowledge of the area following past work at the Welsh Office.

17. On the basis that the applicant has submitted ALC assessment which appears to indicate that the land is low grade agricultural land (Grade 3B) in this instance it is considered that this refusal reason can be removed *unless members feel that a validation test should be carried out*

Refusal Reason Number 3

18. The Landscape Officer has again objected to the application and has stated that the current application is lacking in detail compared to the previous application. It is likely that the access to serve the development will require visibility splays which would lead to the removal of mature and well established trees and further works to lower the stone wall will be required. The comments of the Council's Countryside Officer are sought regarding the impact of this on bio-diversity and nature conservation and the impact of the development from the Head of Highways and Transportation in terms of the requirement for visibility splays etc will be reported at Committee. A response is also awaited from the Principal Conservation Officer.
19. The agent has provided a response to the above which states There is no detailed landscape impact assessment methodology mentioned to score the landscape impact, there have been no objections from Countryside Council for Wales No trees are being lost along the sight line only within the access link road section and this amount to a small number of trees which have been marked up on site for felling The applicant reserves his position to call upon an expert landscape consultant's advice to counter the views held at the Council to new exceptional housing development on site with limited landscape issues.
20. Depending on the comments received from the Countryside Officer and Head of Highways and Transportation it is still likely that the view taken is that this development would have an adverse visual effect on the Landscape Conservation Area. A further update will be made in the addendum

OTHER CONSIDERATIONS

Highway issues

21. A response from the Head of Highways and Transportation is currently awaited.

Drainage

22. The applicant is proposing soakaways in order to discharge surface water details of soil porosity test results have been requested The agent has indicated that this issue has been considered and that a form of attenuation may be carried out instead. Otherwise each plot will have its own soakaways. At this stage given the Council's previous refusal of permission it seems premature to design a drainage scheme.
23. Drainage issues are a material consideration and members will need to consider in this instance whether the method of disposing surface water should be supplied in order that this can be assessed further by Welsh Water.

CONCLUSIONS

24. The application site relates to part of an agricultural field which is situated beyond the recognisable urban boundary of Llanfairfechan National and local planning policies only permit development of this nature in exceptional circumstances where it meets identified local

need or to accommodate a farm or forestry worker. No justification to this effect has been provided and as such the proposals are contrary to national and local planning policies

- 25 Consideration has been given to the Council's overall level of 5 year land supply to meet the requirements of TAN 1. However in this instance it is still considered that the site is unsuitable for *general housing*
26. The proposed development would create a precedent for urban sprawl and would affect the visual amenity of the open countryside and lead to the removal of strategic landscape features *which may be harmful to nature conservation and to the setting of the nearby Conservation Area*. A response is awaited from the Countryside and Conservation Officers and the Head of Highways and Transportation. The information submitted by the agent has been assessed but on balance it is considered that refusal reasons number 1 and possibly number 3 (depending on consultation responses received) of 0/32335 still stand and as such the application should be refused.

RECOMMENDATION

- (A) Minded to refuse planning permission
- (B) That the Head of Planning Services be authorised to determine the application under delegation

Gwasanaethau Cynllunio / Planning Services

Cynllun Pwyllgor / Committee Plan

Rhif Cais [0/34178] / Application Number

