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September 18, 2019

To: Strategic Planning Policy Service
 Conwy County Borough Council (CCBC)
 PO Box 1, Conwy LL30 9GN

Subject: Replacement Local Development Plan (RDLP) 2018-2033, Preferred Strategy, Llanrhos Strategic Site

The Llanrhos Strategic Site (LSS) falls wholly within the Green Wedge Protected Area of the 1982 Llandudno and Conwy District Plan, intended to maintain Deganwy, Llanrhos and Llandudno as separate urbanisations and thus also to prevent continuous urbanisation of the area between the Conwy River and Llandudno Bay.

We strongly oppose development of the subject green wedge, mainly but not exclusively on the following grounds:

- The green wedge needs to be conserved in its entirety in order to maintain the separate urban identities of Deganwy, Llanrhos and Llandudno
- The green wedge is essential to maintaining the semi-rural character of the wider area, taking in the CADW-protected Deganwy Castle site, upon which tourism-related businesses generally and the Maes Dollau Caravan Park in particular depend critically.
- The green wedge takes in prime farm land, wildlife habitat and natural rain water drainage that, given the existential threat posed by climate change, needs to be conserved for local food production and/or re-forestation, contributing to the reduction of food miles, to the sequestration of greenhouse gases and to damping (slowing) of rainwater runoff.
- Readily accessible green areas are vital to the health and wellbeing of local residents.

Significant other considerations arguing against the proposed development include.

- CCBC Background Paper BP 29 presents the findings of White Consultants: Environment Ltd, which, if followed would disqualify the LLS, includes the following key observations and conclusions.
 - Landscape and Visual Sensitivity: "Housing development would adversely affect the setting of Deganwy Castle/The Vardre and effectively join the two settlements which have distinctly separate identities, would separate the landscape of the green wedge to the north and south and would reduce and compromise the role of the green wedge to contain, complement and act as the setting to the built form "
 - Recommendation: "The area should remain largely intact as it is already relatively narrow between large urban areas with severe pressure for development. It also hosts some very sensitive receptors including Deganwy Castle and Bryniau Tower as well as being adjacent to Bodysgallen. These are very important in maintaining a positive landscape setting and approach to Llandudno. The three settlements should not be allowed to meet and buffers should be maintained. This may mean that some landscapes will need to be managed in perpetuity as green space, possibly with multifunctional uses. Therefore, only those sites which have a minimum effect on the actual physical separation and perceived separation of settlements should be allowed. These are the eastern part of site 39, 91, the northern edges of 103 and 108, and 111."
- The projected housing demand not justified in terms of actual population and economic growth: CCBC's own figures for the period 2007 – 2017 show that both the working age population of the county and also the industrial base were in decline. The Llanrhos area is largely populated by retirees so, without local economic and jobs growth, new properties in Llanrhos are likely to be occupied by retirees for lifestyle reasons and/or commuters employed in areas eastwards adding unsustainably to greenhouse gas emissions.
- Insufficient/unsuitable road and footpath infrastructure: Pentwyn Road especially but also Bryn Lupus Road and feeders Deganwy and Bryn Gosol roads, already at times dangerously congested, will become unsustainably congested upon completion of the Marl Lane developments and any at the LSS site. Redevelopment of existing school sites (Deganwy and Nant y Coed) would in contrast avoid additional infrastructure requirements and also keep schools local to catchments.

- Medical services resource base: already exceptionally stretched and/or, in the case of Llandudno hospital, in decline, the existing resource based could not possibly cope with demand increased on the scale inevitably arising from the proposed development.
- Compromise of the Maes Dollau caravan park business: the viability of this business undoubtedly hinges on its rural surrounds, which would be totally compromised by development of the LSS.

For the following reasons I see the manner in which the CCBC proposal has been forwarded as an abuse of process:

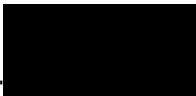
- Misleadingly inconsistent LSS site extents: The extent of the LLS shown in the "Summary of the Preferred Strategy" (Page 10, "Creuddyn") and also in Background Paper BP 06 (sheet 27), is materially different from and larger than that published in CCBC's Preferred Strategy (sheet 181).
- Misleading layout and amenity content: The aforementioned "Creuddyn" maps indicate notional layouts and amenities such as playgrounds and allotments that inevitably lead the consultee to interpret them as a CCBC proposal having met the requisite selection criteria and proper evaluation of environmental impact, traffic impact, land quality (especially agricultural value) and ground conditions. We believe such "indicative maps" are designed to "sell" the concept rather than arrive at a fair and rational result and we wish to know if the aforementioned evaluations been carried out and published?

Should the LSS be developed then we would ask CCBC to respond to the following questions:

- Will CCBC require any new houses to be built using carbon-sequestering cement technology? See Solidia Technologies <https://www.solidiatech.com/> and BBC podcast <https://www.bbc.co.uk/programmes/w3csz1ns>.
- Will CCBC require that any new houses built be carbon neutral to help limit climate change and sea level rise?
- Will CCBC ban householders from paving-over their front gardens and require them to be vegetated in order that a) rainwater run-off be minimised and b) natural carbon sequestration capacity be fully utilised?
- Will CCBC strive for zero population growth, a steady state economy, locally sustainable food supply and carbon sequestration measures including but not limited to re-afforestation of greenfield sites like that in Llanrhos.

We wish you to consider this objection in principle and also to withdraw the LSS from the proposed strategic sites and permanently exclude it from future consideration We also wish you to routinely undertake and publish proper environmental, land quality, traffic and ground conditions studies prior to suggesting possible strategic development sites.

I am totally opposed to the development of the Llanrhos Strategic Site on Green Wedge land.

Signature  Date 19/09/2019

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