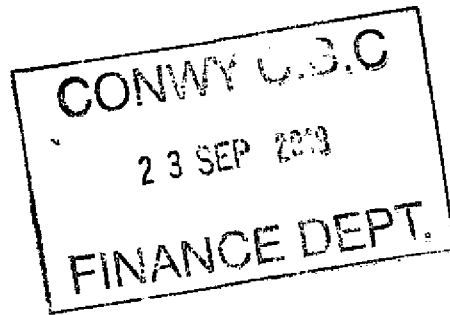


18 Dublin Croft,
Great Sutton,
Ellesmere Port,
Cheshire.
CH66 2TE.



Date: 16th September, 2019.

Dear Sirs,

Conway Replacement Local Development Plan Preferred Strategy:

Objection to the Inclusion of Land to the South of Bryn Lupus Road, Llanrhos as Strategic Development Site (Strategic Site No. 2)

We write as concerned regular users of the public footpaths in the area of Bryn Lupus Road, Llanrhos. The proposed Llanrhos strategic development site set out in the Authority's Preferred Strategy, as issued for public consultation shows removal of these footpaths with inadequate protection for the rights of regular ramblers in the area. The strategic site as displayed at the recent exhibition at Llanrhos Old School on 12th August will decimate this area beyond recognition.

The strategic site identified by the Local Planning Authority sits within an existing green wedge, an existing special landscaped area and within a registered landscape of outstanding historical interest. The land forms an important and acknowledged function in retaining separation of the settlements of Deganwy, Llanrhos and Llandudno Junction and in providing landscaped setting for Deganwy Castle, The Vardre and Bryniau Tower. It also forms an important undeveloped rural area between settlements to the north and south. The land has an important role in maintaining open views towards Deganwy Castle and the Vardre and also forms part of the landscape view from these viewpoints. The land is not only within the special landscape area but also the Creuddyn and Conwy Historic Landscape Area.

We object to inclusion of the proposed strategic site for the following reasons:-

1. Development would adversely affect the role of the green wedge in maintaining separation of the settlements and would adversely affect the setting of Deganwy Castle and The Vardre. The area forms an important green countryside buffer of rural character between Deganwy and Llanrhos. Development of the site would clearly severely prejudice identity and character of Llanrhos and Deganwy and undermine the effectiveness of the green wedge within the vicinity. It would also clearly severely impact upon special and historical landscape character to the detriment of the local and wider Llandudno area. Given the existing constraints upon development of the site outlined, it is difficult to appreciate why the included candidate sites were not removed/discounted at the initial assessment stage;
2. It is our understanding that not all landowners with interest in the land included within the proposed strategic site have agreed to development of the site. There must therefore be doubt regarding deliverability of the site and, again, we would on that

basis question the appropriateness of inclusion of the site within the preferred strategy at this stage;

3. As far as we are aware, there does not appear to have been full and adequate assessment of suitability of the site for development purposes. We have not to date seen any proper assessments of agricultural land classification, visual impact assessment, flood risk and drainage capacity, ecological matters nor traffic impact. Again, we would question appropriateness of inclusion of the site in the absence of such assessments;
4. It is concerning that no assessment of submitted candidate sites has been prepared/published by the Authority and that no possible alternative strategic sites to those stated as preferred are actually documented. Without such assessment being available for inspection/consideration it is impossible to determine that strategic sites proposed by the Authority are indeed preferable options on anything like objective basis;
5. It is noted that three of the five strategic sites proposed are to include the provision of new primary schools. It is however our understanding that population in Conwy is actually declining and, certainly in the case of Llanrhos in particular, there will be insufficient pupils to support provision of a new primary school unless children are taken from other schools which presumable would have to be closed. It is also noted that housing projection figures relied upon to justify the preferred sites exceed those issued by Welsh Government:
6. We are deeply concerned that plans displayed by the Local Planning Authority at the exhibition at Llanrhos Old School on the 12th August 2019 differed from those published in the preferred strategy sent out for public consultation. This has led to confusion and has clearly undermined the consultation process. We also note that the public consultation notices were not freely available.
7. At the most local of levels, development of the strategic site will clearly have detrimental impact upon the local public footpath network and will detrimentally prejudice holidaymaker's experience of the locality.
8. The plan appears to include the diversion of public rights of way and yet no provision is visible in the plan to ensure:
 - a. Diverting the right of way is necessary in the interest of the relevant landowner and/or the public to do so, but only where:
 - (i) the diverted route would not be substantially less convenient to the public; and
 - (ii) the diversion would not alter the termination of the path, except where it would link to another point on the same highway, or a highway connected to it which this plan does appear to do so.

- b. The effect the diversion would have on public enjoyment of the path as a whole must also be taken into account and yet this too does not appear in the plan.

We trust that the above views will be taken into account and that the Llanrhos strategic site will be removed from the Local Development Plan.

Yours faithfully,

A black rectangular box redacting the signature of Sarah Wellings.

Sarah Wellings, LLB.