

# Conwy Local Development Plan Call for Sites (Affordable Housing) – Land at Towyn

Representations of behalf of the Trustees of DJ Morris Deceased Estate

## **CONTACT DETAILS**

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## **EXECUTIVE SUMMARY**

Conwy Council are currently in the process of developing their Replacement Local Development Plan. A Call for Sites process is currently open seeking suitable sites for Affordable Housing in the borough. There is an opportunity to put forward two parcels of land at Towyn for future affordable housing development.

The land identified in this document is sustainably located, deemed suitable, achievable, and available for the delivery of affordable housing development. We believe the parcels of land could form part of the solution to addressing affordable housing land supply issues for the future years of the Local Development Plan and beyond.



## Contents

		Pages
1.0	INTRODUCTION	1
2.0	SITE AND SURROUNDING AREA	1
3.0	ASSESSMENT	7
4.0	CONCLUSION	8



## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by Fisher German on behalf of the Trustees of DJ Morris Deceased.
- 1.2 Conwy Council are in the process of developing their Replacement Local Development Plan (LDP). Once the plan is adopted this will set out the land use planning during the period of 2018-2033. Currently the Council is undergoing a Call for Sites process specifically to submit affordable housing led sites for the inclusion of the LDP where at least 50% of the housing will be affordable.
- 1.3 Fisher German are promoting the two parcels various identified on behalf of the landowner.

  The parcels of land could form part of a longer-term strategy for meeting the Borough's future affordable housing developmental needs.
- 1.4 The Replacement LDP must ensure that it can deliver the housing and employment needs identified for the future, inclusive of affordable housing.
- 1.5 Further information on the site and its background is provided in Section two.

## 2.0 SITE AND SURROUNDING AREA

- 2.1 The two sites are located in close proximity to another. Figure 1 identifies how close both sites are, hence dealt with in the same submission. Parcel 1 is known as 'Land off Towyn Way West' and Parcel 2 is known as 'Land at Junction of Towyn Way West and Gors Road'.
- 2.2 For context, the land parcels are greenfield, agricultural land. They can be considered to be of little landscape and amenity value on the edge of Towyn.



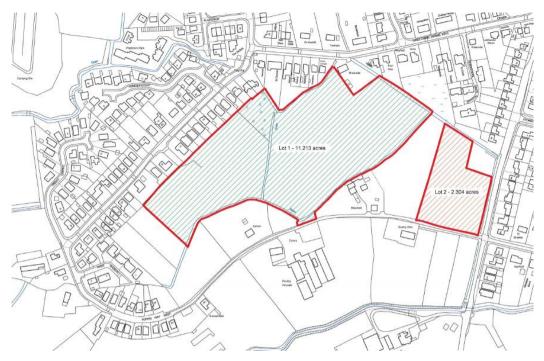


Figure 1. Parcels 1 and 2 (Not to scale).

- 2.3 Plot one is 11.21 acres and Plot 2 2.3 acres located on the edge of Towyn's settlement boundary in close proximity to existing residential development. The development of these parcels would be seen as a natural extension to the existing identified development boundary.
- 2.4 Towyn is considered an 'Urban Area' (Policy DP/2), therefore considered a sustainable settlement. The policy states that most new development will take place within and on the fringe of these urban areas. These urban areas are key in the provision of Affordable Housing on both allocated and windfall sites. Settlement boundaries will also be amended to reflect the proposed development.
- 2.5 The sites currently are both considered to be located in Open Countryside, outside of any designation or boundary line.
- 2.6 Both parcels have previously been put forward during the 2018 'Call for Sites' process for promotion of market housing. They were both removed during the candidate site assessment process. References; 0072 and 0071.



- 2.7 The promotion of these parcels is for the sole purpose of seeking to address the housing needs for Towyn and surrounding local areas. These parcels are sustainably located for affordable housing.
- 2.8 The site can be viewed as developable without the need for the surrounding land to be developed before. The access points of the sites offers flexibility with regard to the scale of development site can offer, dependent on the extent of affordable housing need in Towyn.
- 2.9 There are no sites available within the settlement boundary currently that will provide such a quantum of development, creating the likelihood of future windfall schemes close to the edge of the town. The council can have control over the type of housing it wishes to allocate, and further input into the considerations regarding landscape impact and design if the site comes forward through formal allocation.
- 2.10 A plan has been provided appended to this submission identifying the location of both parcels promoting for delivering affordable housing.

## Housing Type

- 2.11 The land offers the potential for flexibility of the type of residential development offered. This call for sites process is for affordable housing, however there is nothing to say a mixed development comprising of some market houses could not be brought into a scheme here.
- 2.12 The land could offer a scheme of different sizes, types and tenure of housing to meet the needs of the community in Towyn. A diverse offering creates sustainable communities and inclusive places and discourages from isolation.
- 2.13 The land parcels are large enough to offer residential development and some areas of recreational spaces, of which other existing residential dwellings in the area could enjoy also. Creating a positive enhancement to the immediate area.
- 2.14 In the current LDP there was no housing allocation sites proposed in Towyn, therefore the LDP is not taking account the local housing needs for people of Towyn. This is a golden opportunity to provide a well-needed housing allocation in a sustainable urban area.



## Access

- 2.15 Parcel 1 has a very good access onto Towyn Way West, it's like the access is already 'self-made' for a future housing development to be accessed off this. The access offers good visibility in both directions and enters onto a residential road which already benefits from traffic calming measures.
- 2.16 Parcel 2 accesses onto a private lane currently, however improvements could be made to this, or a new access created onto Gors Road. Gors Road is a 30mph road and benefits of good visibility from the land.
- 2.17 Both land parcels would enter and exit onto 30mph roads.
- 2.18 Pedestrian and cycle access can be sought from and in the site itself creating good permeability through a development and creating connectivity with the wider town.
- 2.19 Developing these parcels of land is not expected to have a material impact on the surrounding highway network.

#### Flood Risk

- 2.20 The parcels are located on land designated as Flood Zone C1.
- 2.21 Mitigation can be brought into developments to enable successful residential development within Flood Zones.
- 2.22 Flood Zone C1 is an area considered to be located within a natural floodplain but is currently served by significant flood defence infrastructure. An internet-based search, and review of the Conwy Local Flood Risk Management Strategy (2013) identified that in 1990, the site (and wider Towyn area) was impacted by a breach of the coastal flood defences.
- 2.23 Throughout the last thirty years, over £10 million has been invested to improve the existing coastal defences protecting Towyn. These improvements include new groynes, beach nourishment, refurbishment of the existing sea wall along the frontage, and implementation of a new offshore breakwater.



- 2.24 Just because the land is considered C1 on a map, a Flood Consequence Assessment should be carried out or at least a Flood Risk and Hydraulic Modelling Scoping Exercise, for the potential residential development of the land before disregarding the sites through assessment.
- 2.25 A classification on a desktop should not preclude development potential.
- 2.26 A residential development scheme was permitted in 2020 for 14 dwellings (0/47217) at the former Windjammers wine bar. This site will be affected by potential flood risk, but mitigation has enabled permission for a successful housing development.

## Heritage

- 2.27 There are no Listed Buildings or heritage assets/designations on or in close proximity to the sites.
- 2.28 None of the land is part of any Conservation Area.

## Ecology

- 2.29 There are no Local Wildlife Sites within the land holding.
- 2.30 It is recommended that ecology surveys are carried out to establish local biodiversity presence and habitat if the land was to be formerly assessed for development.

#### **Trees**

- 2.31 There are trees which border the parcels of land, parcel one is far denser and more mature in terms of tree species on parts of the land. Although both parcels have been managed agricultural land, therefore not holding trees of great merit.
- 2.32 There are no TPO's located on the site. A tree survey would be carried out if assessed future in the future to demonstrate the tree species and condition.
- 2.33 Although it would be encouraged to retain as many trees as possible on the site currently as part of a future development and enhance through increased tree and hedgerow planting where possible.



## Landscape

- 2.34 The land is flat and forms part of the urban fringe of Towyn.
- 2.35 The land is not within any special landscape designations and is not land which would rank highly in terms of landscape value to the immediate area.
- 2.36 The loss of greenfield land for residential housing would not have detrimental impact on the wider area, given the sites are bound by residential houses. If anything, the 'natural' boundary of the settlement should be the land of Towyn Way West. Beyond this boundary is where the 'real countryside' is and land of importance to the local landscape.
- 2.37 The parcels of land feel very non agricultural given they are surrounded by scattered residential developments.

## Sustainability

- 2.38 The site has good public transport links to Rhyl and Llandudno. The nearest bus stop is on Gors Road which provides the 46 service. The number 12 services can be accessed a short walk away on Towyn Road and provides the key frequent coastal service between Rhyl and Llandudno.
- 2.39 There are three places of worship within very close proximity to the sites. Towyn Park is not located too far away, and all key shops, services and facilities are located on/ off Towyn Road. All within walking distance to the sites.
- 2.40 Personal vehicle ownership is not a requirement for residential development of these land parcels.
- 2.41 The land is in a highly accessible location, close to transport links as well as cycling links, with excellent opportunities to create a network of linkages and across other residential developments.



## 3.0 ASSESSMENT

#### Deliverable

3.1 The landowners are committed to the delivery of the sites and will welcome further conversations to promote and develop the site for affordable residential use.

## Suitable Location for Development

- 3.2 The sites are well located, contained and only constrained by Flood Risk which can be overcome and mitigated. A C1 desktop analysis should not preclude development or the assessment of both sites.
- 3.3 The land is located on the edge of the existing identity development boundary of Towyn. Towyn is considered an Urban Area in the LDP (Policy DP/2) and is a sustainable location for residential development to be delivered within the boundary or on the urban fringe. Towyn comprises of all services, facilities and amenities required for sustainable development and one which vehicle ownership is not key for accessibility.
- 3.4 It's important to retain the sustainability of suburban areas within towns for the future, new housing will increase the usage of local services and facilities and in turn ensure the Towyn and the local economy thrives for the future.

#### **Achievable**

3.5 The sites only constraints is the C1 Flood Risk Zone. Scoping Exercises and Hydraulic Modelling would take place and in turn a fully detailed Flood Consequence Assessment would be carried out to ensure development is achievable through appropriate mitigation. Therefore, fully achievable.

## Benefits of Developing Land

- 3.6 To allocate the sites for residential development would enable significant benefits to the sustainable town of Towyn and its local residents.
- 3.7 The identified housing need would be met, and the sustainability of Towyn's residential areas for the long-term can be retained through the increased numbers using local services and facilities. Towyn is densely populated by tourism sites, and it needs to be remembered that



these are mostly seasonal, and future longevity of the town should not be relying upon this seasonal expenditure and presence in the town.

3.8 Both sites are logical parcels of land on the development boundary edge of Towyn. They would welcome a natural extension to the town and existing residential areas, given the sites are bordered by residential dwellings.

## 4.0 CONCLUSION

- 4.1 As detailed above, the land parcels represent suitable sites for future residential development. With the only constraint being of flood risk. This should not preclude development from taking place on the site though and should rather be the forefront of developing homes which can be developed within these zones.
- 4.2 Flood mitigation can be achieved and incorporated into the development of the site and dwellings. Albeit flood risk, the sites present no other issues or constraints that would require further exploration and development of the parcels would become a natural and logical extension to Towyn.
- 4.3 We would welcome ongoing dialogue going forward with the council to continue discussions on delivering affordable residential housing at both parcels in Towyn.

