

G. D. Kenyon, MRTPI

Director (Managing)

Our Ref: K/JM/12640

16th September, 2019

7729.27786

Dear Sirs,

Conwy Replacement Local Development Plan Preferred Strategy;
Proposed Strategic Development Site No. 2;
Land to the South of Bryn Lupus Road, Llanrhos;
Objection on behalf of Maes Dolau Caravan Park Ltd – Mr Rikki Proffitt.

We act for Maes Dolau Caravan Park Limited. On behalf of our Client we wish to object in the strongest possible terms to inclusion of the Llanrhos Strategic Development Site in the Preferred Strategy as issued by your Authority for public consultation.

The proposed strategic development site set out in the Authority's Preferred Strategy will adjoin our Clients caravan park to the north, east and west. The strategic site as displayed at the recent exhibition at Llanrhos Old School on 12th August will surround the caravan park on all sides.

The strategic site identified by the Local Planning Authority sits within an existing green wedge, an existing special landscape area and within a registered landscape of outstanding historic interest. The land forms an important and acknowledged function in retaining separation of the settlements of Deganwy, Llanrhos and Llandudno Junction and in providing landscape 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.

Maes Dolau Caravan Park has been attracting holiday makers to the Llandudno area since the 1950's, contributing to the tourism economy and bringing revenue into the local area. At local level, development of the strategic site will have detrimental impact upon the setting of Maes Dolau Caravan Park, will detrimentally prejudice holiday makers experience of the park and its locality and will adversely prejudice amenity of site occupants. As result, continued contribution to the local tourism economy will clearly be threatened.

In context of the above, we object to inclusion of the proposed strategic site for the following reasons:-

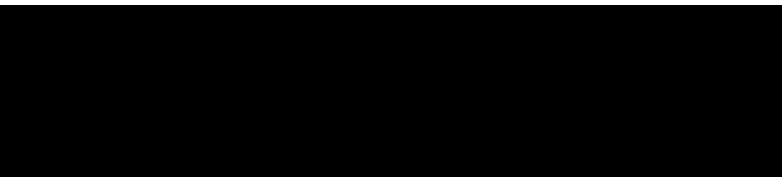
1. Development would adversely affect the role of the green wedge in maintaining separation of the settlements and would adversely affect the setting of Deganwy Castle and The Vardre. The area forms an important green countryside buffer of rural character between Deganwy and Llanrhos. Development of 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 historic 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. We are also deeply concerned that our Client received no prior communication from your Authority regarding possible inclusion of the site in the preferred strategy prior to the preferred strategy actually being published;

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 3 of the 5 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 presumably 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;
7. At the most local of levels, development of the strategic site will clearly have detrimental impact upon the setting of Maes Dolau Caravan Park and will detrimentally prejudice holiday makers experience of the park and the locality. Amenity of existing site occupants will clearly be adversely affected and continued future contribution to the local tourism economy will be threatened..

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,



Kenyon Planning

By Email

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