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PLANNING

**LAND NEAR Tŷ HAPUS, CWM ROAD,
LLANDUDNO LL30 1HB
PLANNING STATEMENT
GRŴP CYNEFIN & FIRST CHOISE HOUSING
ASSOCIATION (FCHA)
MARCH 2025
2024.077_02**

**DRAFT FOR PRE-APPLICATION
CONSULTATION (PAC)**

Conwy | 20 Connaught House, Riverside Business Park, Benarth Road, Conwy LL32 8UB

Chester | 1 Aldford House, Bell Meadow Business Park, Pulford, Chester, CH4 9EP

Planning Statement



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1. Introduction

- 1.1 This Planning Statement accompanies a joint application made by Grŵp Cynefin and First Choice Housing Association (FCHA) for full planning permission for the erection of 29 affordable dwellings, formation of new vehicular access from Cwm Road, creation of new internal access road and parking area, together with associated works for landscaping and drainage infrastructure on land near Tŷ Hapus, Cwm Road, Llandudno, LL30 1HB.
- 1.2 Following the enactment of the Planning (Wales) Act 2015 (the Act) the requirement for pre-application consultation on major development schemes was implemented. This includes the provision of residential development of 10 or more dwellings. The proposed development exceeds the 10 dwelling threshold.
- 1.3 The requirement to carry out pre-application consultation falls under Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order. Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.
- 1.4 This Planning Statement is issued as part of a suite of documents for Pre-Application Consultation prior to the submission of a formal planning application.
- 1.5 The adopted development plan consists of the Conwy Local Development Plan (LDP), which was adopted in October 2013.
- 1.6 Pre-application discussions were undertaken with the Local Planning Authority prior to the commencement of Pre-Application Consultation on a draft application. Advice and feedback received during pre-application discussions has been taken into account whilst formulating the application.

2. The site and context

- 2.1 The application site lies to the west of Tŷ Hapus Community Centre in Llandudno. Access to the application would be provided from Cwm Road, which borders the site to the west, whilst the site also borders Ffordd Penrhyn to the south and existing residential dwellings to the north.
- 2.2 An aerial image identifying the location of the application site in the context of the surrounding area is provided in Figure 2.1.

Figure 2.1 Aerial image identifying application site



- 2.3 The application site lies within the development boundary of Llandudno and is in a predominantly residential area. Existing dwellings are located to the north, west and south of the site, whilst an Asda superstore is found to the east, beyond the Tŷ Hapus Community Centre. To the south of the site is Ysgol Morfa Rhianedd, along with Ysgol John Bright just beyond.
- 2.4 The application site comprises of a derelict multi-use games area (MUGA) which is in poor condition and has fallen into disuse in recent years. The MUGA features a low brick wall and metal fence surrounding the hardstanding pitch, which covers most of the site area to the east of Tŷ Hapus and wraps around the back of the Community Centre. The rest of the site features some patches of grassed areas around the MUGA.
- 2.5 The existing condition of the application site can be seen within the images included within Figures 2.2 and 2.3

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Figure 2.3 Image displaying existing condition of application site from Cwm Road



Figure 2.3 Image displaying existing condition of application site from Ffordd Penrhyn



- 2.6 Due to the poor condition of the MUGA and it falling out of use in recent years, the site is not included within the areas of Public Open Space (POS) provision by Conwy County Borough Council and is therefore considered to be a brownfield site.
- 2.7 Llandudno is identified as an 'Urban Area' within the adopted Conwy Local Development Plan (LDP).

3. The proposed development

3.1 This proposal relates to a residential development of 29 affordable dwellings which would be delivered for Grŵp Cynefin and First Choice Housing Association (FCHA) as Registered Social Landlords (RSL). An extract of the proposed site layout plan is provided in Figure 3.1.

Figure 3.1 Extract of proposed site layout plan



3.2 Access to all plots would be provided by a proposed site access point connecting to Cwm Road along the north-eastern corner of the site. This access road would then connect to two separate parking courts, one to the south which would serve plots 1-16 as well as plot 21, and one to the east which would serve plots 24-29. Plots 17-23 would feature a driveway to the front of the property, along with additional designated parking spaces along the adjacent side of the site access road, with all of these plots featuring two designated parking spaces per dwelling. The rest of the dwellings would all have a minimum of one designated parking space located within the parking courts.

3.3 The proposed development includes the following housing mix:

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Table 3.1 Proposed housing mix

House Type	Type	Number of units	Plot numbers
5P3B	Semi-detached	2	17 & 21
4P2B	Semi-detached	2	22 & 23
4P2B	Terraced	3	18, 19 & 20
3P2B	Apartment	3	12, 14 & 16
2P1B	Accessible apartments	3	11, 13 & 15
2P1B	Assisted living apartments	6	24-29
2P1B	Apartment	10	1-10

- 3.4 The dwellings would be provided as social rental properties that would be let in partnership between Grŵp Cynefin and First Choice Housing Association (FCHA).
- 3.5 Each dwellinghouse features a garden area to the rear and a private driveway to the front of the property, with each property having two designated parking spaces.
- 3.6 Each apartment has been designed with a high quality design and layout with convenient access to amenity areas, shared areas for clothes drying and waste storage, along with a designated parking space and access to visitor parking.

Appearance

- 3.7 The dwellings/apartment block proposes to include the following materials:
- **Roof** – Slate/concrete tiles;
 - **Walls** – Off-white render, grey engineering brick and timber cladding;
 - **Windows and doors** – Graphite uPVC and grey artstone surround/cills; and
 - **Facia's soffits and rainwater goods** – uPVC.
- 3.8 Please see the Design and Access Statement for details regarding design and appearance.

Landscaping

- 3.9 The proposed soft landscaping plans identifies little to no existing green infrastructure which would be able to be retained, with no trees or hedges located within the existing site.

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- 3.10 Native hedge planting is proposed around the site boundary, along with low shrub and perennial pollinator planting areas and short mown amenity grass areas.
- 3.11 It is proposed for the planting of 21 no. new specimen trees, including 2 within proposed rain gardens.

4. Policy context

4.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.

National planning policy and guidance

4.2 The proposal relates to a residential development and relevant national planning policy is set out in:

- Planning Policy Wales (PPW) Edition 12, (2024);
- Future Wales: The National Plan 2040 (FWTNP);
- Building Better Places: The Planning System Delivery Resilient and Brighter Futures (July 2020);
- Active Travel (Wales) Act 2013; and
- Technical Advice Note(s) (TAN):
 - TAN 2: Planning and Affordable Housing (2017)
 - TAN 5 ‘Planning and Nature Conservation’ (2009);
 - TAN 11 ‘Noise’ (1997) ;
 - TAN 12 ‘Design’ (2016);
 - TAN 15 ‘Development and Flood Risk’ (2004);
 - TAN 16 ‘Sport, Recreation and Open Space’ (2009);
 - TAN 18 ‘Transport’ (2007);
 - TAN 20 ‘Planning and the Welsh Language’ (2017);
 - TAN 23 ‘Economic Development’ (2014); and
 - TAN 24 ‘The Historic Environment’ (2017).

4.3 The documents listed above are summaries in turn within the table below.

Table 4.1 Summary of national planning policy and guidance

Policy	Summary
Planning Policy Wales (Edition 12), 2024;	The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

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	<p>PPW defines “sustainable development” as “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.</p> <p>Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.”</p> <p>PPW sets out that sustainable places are the goal of the land use system in Wales, which should create places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly.</p> <p>Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all.</p> <p>PPW provides that the most appropriate way to implement sustainable development is to adopt a placemaking approach to plan making, policy and decision making.</p> <p>“Placemaking” is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.</p> <p>The Active and Social theme of planning policy covers transport, housing, retail and commercial development, community facilities and recreational spaces.</p> <p>This theme supports and enables the provision of a range of well-designed and located homes which are well connected to existing retail and commercial centres situated at the heart of our communities and job opportunities. It emphasises that when planning and managing future development planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities including recreation, leisure, health and education. It promotes retail and commercial centres as hubs, for a range of activities, recognising their social, cultural and economic importance. It acknowledges the significance of community facilities and recreational spaces for our health, well-being and quality of life and specifically protects and promotes these uses in line with the overarching national sustainable placemaking outcomes.</p> <p>It aims to ensure new development is located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, local services and community facilities.</p> <p>New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the</p>
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	<p>range of identified housing needs and contribute to the development of sustainable and cohesive communities</p> <p>The planning system must:</p> <ul style="list-style-type: none"> • identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures; • enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and • focus on the delivery of the identified housing requirement and the related land supply. <p>The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements must be demonstrated through a housing trajectory. The trajectory should be prepared as part of the development plan process and form part of the plan. The trajectory will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period.</p> <p>Planning authorities must use their housing trajectory as the basis for monitoring the delivery of their housing requirement. Accurate information on housing delivery assessed against the trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports (AMRs) and for subsequent plan review. Under delivery against the trajectory can itself be a reason to review a development plan. The monitoring of housing delivery for AMRs must be undertaken by planning authorities in accordance with the guidance set out in the Development Plans Manual.</p> <p>Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities.</p> <p>Planning authorities, landowners and house builders must work together constructively to identify deliverable housing land in sustainable locations for development.</p> <p>A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications.</p>
<p>Future Wales The National Plan 2040;</p>	<p>Future Wales provides evidence of the need for housing across Wales at both a national and regional level. This evidence demonstrates the need for a focus on increasing the delivery of social and affordable homes. The Welsh Government is targeting its housing and planning interventions towards achieving this aim within the broader context of increasing supply and responding to different needs, including our ageing society and climate change.</p>
<p>Building Better Places: The</p>	<p>This document emphasises the importance for the consideration of health and well-being throughout the planning system of Wales.</p>

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<p>Planning System Delivering Resilient and Brighter Futures (July 2020);</p>	<p>The document sets out ways for which future development and the planning system must move forward following the significant impact that Covid-19 has had on communities. It emphasises the importance of creating homes that are life-long, adaptable, secure and affordable.</p> <p>The document states that we need to “...ensure we are building homes and neighbourhoods that are great places to live, with easy access to services and appropriate infrastructure and greenspace”.</p> <p>The guidance also notes that Covid-19 has demonstrated that planning decisions can be undertaken quickly and effectively and continues to encourage this.</p>
<p>Active Travel (Wales) Act 2013;</p>	<p>The Active Travel (Wales) Act 2013 requires Welsh local authorities to improve walking and cycling infrastructure. It mandates mapping and developing active travel routes, integrating active travel into transport planning, consulting the public, and reporting progress. The goal is to promote walking and cycling, reduce car use, improve health, and cut emissions.</p>
<p>Technical Advice Note (TAN) 2: Planning and Affordable Housing (2017);</p>	<p>Technical Advice Note (TAN) 2: Planning and Affordable Housing provides guidance on the role of the planning system in delivering affordable housing in Wales.</p> <p>The document defines affordable housing as housing where secure mechanisms are in place to ensure accessibility for those who cannot afford market housing, both on first occupation and for subsequent occupiers. TAN 2 outlines the responsibilities of local planning authorities, including:</p> <ul style="list-style-type: none"> • Including an affordable housing target in development plans based on identified housing needs. • Indicating how these targets will be achieved using identified policy approaches. • Monitoring the provision of affordable housing against the targets and taking necessary action to ensure they are met. <p>The guidance also emphasizes the importance of collaborative working between housing and planning authorities and the need for local housing market assessments to determine affordability.</p> <p>The guidance also addresses the role of registered social landlords and the use of planning obligations and conditions in securing affordable housing through the planning system.</p> <p>By following TAN 2, local planning authorities can effectively integrate affordable housing considerations into their planning processes, ensuring that housing needs are met in a sustainable and equitable manner</p>
<p>Technical Advice Note (TAN) 5 ‘Planning and Nature Conservation’ (2009);</p>	<p>This document offers guidance on how the land use planning system in Wales should contribute to the protection and enhancement of biodiversity and geological conservation. TAN 5 should be read in conjunction with Planning Policy Wales (PPW), particularly Chapter 5, which outlines the Welsh Government’s objectives for the natural heritage and the land use planning policies supporting these goals.</p> <p>TAN 5 emphasizes the importance of integrating nature conservation into all stages of the planning process, outlining key principles to be followed. The guidance also addresses the preparation and review of development plans,</p>

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	<p>advising local planning authorities to incorporate nature conservation objectives and engage in effective collaboration and work closely with relevant stakeholders.</p> <p>Additionally, the guidance provides detailed advice on the conservation of internationally and nationally designated sites and habitats, as well as local sites. It addresses the protection of priority species, emphasizing the need for developers and planning authorities to consider the presence of protected species and to ensure compliance with relevant legislation.</p> <p>By adhering to the principles and recommendations set out in TAN 5, local planning authorities and developers can ensure that nature conservation is effectively integrated into the planning process, thereby contributing to the sustainable development of Wales.</p>
<p>Technical Advice Note (TAN) 11 'Noise' (1997);</p>	<p>TAN 11 provides guidance on how planning decisions should consider and mitigate the impacts of noise. The key points of TAN 11 are:</p> <ol style="list-style-type: none"> 1. Noise Impact Consideration: TAN 11 outlines the need for assessing noise impacts on development, especially where noise levels could affect sensitive receptors (e.g., residential areas, schools, hospitals). 2. Noise Mitigation: It encourages the use of appropriate design and planning measures to reduce or manage noise, such as incorporating sound insulation or relocating noise-sensitive developments away from high noise areas. 3. Assessment of Noise Levels: The guidance emphasizes the importance of noise assessments for developments near major sources of noise, such as roads, railways, or industrial sites. The assessments should consider both existing noise levels and potential future increases. 4. Sustainable Development and Noise: It supports the principle of sustainable development by ensuring that new developments do not result in unacceptable noise pollution, contributing to the health and well-being of communities. 5. Planning Policy Integration: TAN 11 stresses the need for local planning policies to integrate noise considerations and align with national planning guidance to protect the environment and quality of life. <p>In summary, TAN 11 ensures that planning decisions give due regard to the effects of noise on communities, requiring noise impact assessments and mitigation measures where necessary.</p>
<p>Technical Advice Note (TAN) 12 'Design' (2016);</p>	<p>Technical Advice Note (TAN) 12: Design provides guidance on achieving sustainable development through high-quality design in the planning system. It supports Planning Policy Wales (PPW) by outlining key design principles that contribute to vibrant, inclusive, and sustainable communities.</p> <p>TAN 12 highlights essential design objectives, including:</p> <ul style="list-style-type: none"> • Access: Ensuring developments are inclusive and accessible to all. • Character: Promoting context-sensitive, innovative design that enhances local identity. • Community Safety: Creating safe, welcoming public spaces. • Environmental Sustainability: Encouraging resource efficiency and biodiversity enhancement. • Movement: Supporting sustainable travel through well-connected transport networks.

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	<p>The guidance advises local planning authorities to integrate design principles into development plans, collaborate with stakeholders, and ensure design considerations are embedded early in the planning process. It also stresses the importance of design and access statements in demonstrating how proposals achieve good design. The goal of this TAN is to allow planning authorities and developers to create high-quality, sustainable places that enhance Wales' built environment</p>
<p>Technical Advice Note (TAN) 15 'Development and Flood Risk' (2004);</p>	<p>Provides guidance on how to manage flood risk in the planning process. Key points include:</p> <ul style="list-style-type: none"> • Flood Risk Assessment: TAN 15 stresses the need for a flood risk assessment (FRA) for developments in areas at risk of flooding. This helps to evaluate and mitigate the potential impacts of flooding on people, property, and infrastructure. • Sequential Test: It advocates the use of a "sequential test" to guide development away from areas at highest risk of flooding. Developers must consider less vulnerable areas first before considering higher-risk zones. • Flood Risk Zones: The document categorizes land into different flood risk zones (e.g., Zone A - little or no risk, Zone C - high risk) to guide where development should and should not occur based on flood likelihood. • Mitigation Measures: TAN 15 encourages the incorporation of mitigation measures, such as flood defences, sustainable drainage systems (SuDS), and elevated building designs, to reduce the impact of flooding. • Climate Change Considerations: It highlights the importance of considering future climate change when assessing flood risk, as rising sea levels and increased rainfall may exacerbate flooding. • Integration with Local Development Plans: The guidance emphasizes integrating flood risk management into local planning policies to ensure sustainable and resilient development. <p>The TAN guides planners to avoid or minimize flood risk through proper site selection, assessment, and the implementation of flood mitigation measures, ensuring safety and sustainability in flood-prone areas.</p>
<p>Technical Advice Note (TAN) 16 'Sport, Recreation and Open Space' (2009);</p>	<p>It encourages the planning of accessible sports and recreation spaces for all communities, including those with disabilities. The policy also protects existing open spaces from inappropriate development. It promotes the inclusion of sports and recreation facilities in new developments and emphasizes the need for sustainable, future-proof designs in open spaces and recreational facilities.</p>
<p>Technical Advice Note (TAN) 18 'Transport' (2007);</p>	<p>Technical Advice Note (TAN) 18: Transport provides guidance on integrating land use planning and transportation to foster sustainable development in Wales.</p> <p>Key aspects include:</p> <ul style="list-style-type: none"> • Integration of Land Use and Transport Planning: Aligning development locations with existing and planned transport infrastructure to reduce reliance on private vehicles. • Location of Development: Encouraging developments in areas accessible by walking, cycling, and public transport to promote sustainable travel behaviours. • Regional Transport Plans: Collaborating on regional strategies to ensure cohesive transport networks that support economic growth and accessibility.

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	<ul style="list-style-type: none"> • Parking: Implementing parking policies that balance the needs of users while discouraging excessive car use. • Design of Development: Incorporating design principles that prioritize active travel and public transport access, enhancing the overall sustainability of communities. <p>By adopting the guidance of this document, planning authorities and developers can effectively integrate transportation considerations into land use decisions, promoting sustainable communities throughout Wales.</p>
<p>Technical Advice Note (TAN) 20 'Planning and the Welsh Language' (2017);</p>	<p>This document provides guidance on considering the Welsh language within the planning system in Wales, covering the following areas as the main aspects:</p> <ul style="list-style-type: none"> • Development Plans: Local Planning Authorities (LPAs) should assess how their Local Development Plans (LDPs) might affect the Welsh language, incorporating policies to safeguard and promote its use. • Planning Applications: When determining planning applications, LPAs should consider the potential impact on the Welsh language, ensuring that decisions support its sustainability. • Community Engagement: Effective consultation with Welsh-speaking communities is encouraged to understand and address their specific needs and concerns. <p>TAN 20 aims to ensure that the Welsh language is appropriately considered within the planning system, contributing to the cultural sustainability of communities across Wales.</p>
<p>Technical Advice Note (TAN) 23 'Economic Development' (2014); and</p>	<p>Explains how economic development should be managed through the planning system in Wales, highlighting the need to support a diverse and resilient economy through land-use planning, helping to create sustainable employment opportunities.</p> <p>It encourages planning authorities to allocate land for employment uses and support a range of economic activities, including industry, commerce, and services. The guidance highlights the importance of sustainable economic development that meets present needs without compromising the ability of future generations to meet their own needs. It advises locating economic development in areas with good transport and infrastructure links, ensuring accessibility for businesses and workers.</p> <p>TAN 23 supports the regeneration of disadvantaged areas, promoting economic development in areas that need revitalization. Overall, it guides planning authorities in promoting sustainable economic growth, ensuring that economic development is well-located, diverse, and accessible to all communities.</p>
<p>Technical Advice Note (TAN) 24 'The Historic Environment' (2017).</p>	<p>TAN 24 provides guidance on preserving and enhancing Wales' historic assets. It aims to help preserve historic buildings, landscapes, and archaeological sites and encourages evaluating the significance of heritage assets in planning decisions. It supports the conservation and appropriate adaptation of historic buildings and promotes local community engagement in safeguarding heritage, with the overall goal of ensuring the protection and integration of Wales' historic environment in planning.</p>

Local planning policy and guidance

- 4.4 In accordance with the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the starting point for determination of the application is the Development Plan which comprises, in this instance, the Conwy Local Development Plan (LDP) 2007-2022, which was adopted in October 2013.
- 4.5 The main policies within the adopted LDP which are relevant to the determination of this application are provided within the table below:

Table 4.2 Summary of local planning policy

Policy	Summary
DP/1 Sustainable development principles;	Policy DP/1 establishes Sustainable Development Principles to ensure that all development proposals align with environmental, social, and economic sustainability goals. Key criteria include adherence to national guidance, efficient land use prioritizing previously developed land, conservation of cultural and natural heritage, mitigation of pollution and flood risks, promotion of sustainable transportation, provision of necessary infrastructure, high-quality design standards, and consideration of climate change impacts. By meeting these criteria, developments contribute to creating attractive, accessible, and resilient communities within Conwy County Borough
DP/2 Strategic approach;	This policy outlines the overarching strategic approach to development within the county, emphasizing the focus of development in accessible locations, particularly within urban areas, to promote sustainable communities and efficient land use. It also supports the regeneration of key settlements, aiming to enhance economic vitality and environmental quality. Additionally, the policy encourages the use of previously developed land and prioritizes developments that contribute to social inclusion and cohesion.
DP/3 Design quality and crime reduction;	Policy DP/3 focuses on promoting high-quality design and reducing crime in new developments. It focuses on the importance of maintaining and enhancing existing habitats and species, aligning with the plan's sustainable development principles. The policy encourages designs that deter crime and promote community safety, contributing to the overall well-being and attractiveness of the area
DP/4 Development criteria;	Policy DP/4 sets out criteria for development to ensure sustainability and positive impacts. It focuses on: <ul style="list-style-type: none"> • Efficient land use and prioritizing previously developed land. • Protecting historic sites, biodiversity, and natural resources.

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	<ul style="list-style-type: none"> • Managing risks like flooding and pollution. • Promoting sustainable transport and reducing car use. • Ensuring quality design and infrastructure. • Supporting sustainable economic development. • Addressing climate change and waste reduction. <p>Overall, it aims to balance environmental, social, and economic factors in development.</p>
DP/5 Infrastructure and development;	Policy DP/5 of the LDP addresses 'Infrastructure and New Developments.' It requires that new developments contribute to the provision of necessary infrastructure and public services. This includes, where appropriate, making financial contributions through Section 106 agreements to mitigate the impact of development on local services and facilities. The policy emphasizes the importance of ensuring that infrastructure improvements are in place to support new developments and maintain community well-being
DP/6 National planning policy and guidance;	This policy emphasizes the importance of adhering to national planning policies and guidance in the planning process. It ensures that local development aligns with broader national objectives and standards, maintaining consistency and coherence in planning decisions. This policy underscores the necessity for developments to comply with national frameworks, promoting sustainable and well-planned growth within the Conwy County Borough.
HOU/1 Meeting housing need;	HOU/1 focuses on meeting the housing needs of the Conwy County Borough over the plan period from 2007 to 2022. The policy sets a target of delivering approximately 6,520 dwellings, supported by a contingency allowance of about 650 dwellings, totalling around 7,170 dwellings. To achieve this, the policy outlines a phased approach that prioritizes the use of previously developed land (PDL, emphasising the use of brownfield sites within urban areas to promote sustainable development and regeneration. It also promotes affordable housing, ensuring that a significant portion of new housing addresses local affordable housing needs, particularly for those aged over 55. Along with contingency sites identifying additional sites to be released if necessary to maintain a five-year housing land supply, following a specified order of priority. The policy also emphasizes the importance of high-quality design and sustainable development practices in all new housing projects. It also sets out the housing allocations for different settlement tiers, identifying Llandudno as an 'Urban Settlement'.
HOU/2 Affordable housing for local need;	Policy HOU/2 focuses on providing affordable housing to meet local needs. Key points include: <ul style="list-style-type: none"> • A percentage of new developments must be affordable housing – for Llandudno this is set out at 35%;

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	<ul style="list-style-type: none"> • Applicants must demonstrate a local connection (e.g., living or working in the area); • Developers may provide affordable housing off-site or make financial contributions in some cases; and • Viability assessments are required to ensure the feasibility of affordable housing provisions. <p>The policy aims to address the affordable housing shortage and ensure it meets local demand.</p>
HOU/4 Housing density;	<p>This policy aims to ensure that new residential developments make efficient use of land while providing a mix of housing types to meet diverse community needs. The policy encourages higher-density developments in accessible urban areas to support local services and facilities, without compromising the quality of living environments.</p> <p>It states the following:</p> <ol style="list-style-type: none"> 1. <i>'The council will seek a density of 30 dwellings per hectare on allocated and large windfall sites (10 dwellings and above);</i> 2. <i>Higher densities of up to 50 dwellings per hectare will be sought where it represents a sustainable use of land and buildings and does not result in an unacceptable impact. Higher density schemes which result in a negative residual value and lower affordable housing provision will be discouraged</i> 3. <i>Lower densities below 30 dwellings per hectare may be acceptable in circumstances where natural and/or built environment and infrastructure constraints impact on site layout.'</i>
HOU/5 Housing mix;	<p>HOU/5 outlines how proposals should reflect the requirements in terms of tenure, house type and sizes as set out in Local Housing Market Assessment (LHMA) and housing registers, unless it can be demonstrated that alternative types are needed based on local circumstances or a particular local need.</p> <p>Housing mixes should be well thought-out and adopted based on the alignment with local need, justification for variations and financial viability.</p>
NTE/1 The natural environment;	<p>Focusing on safeguarding and enhancing the natural environment within the County, Policy NTE/1 aims to protect biodiversity, geology, habitats, and landscapes by conserving sites of international, national, regional, and local importance. It also highlights the aim of improving the quality of landscapes and biodiversity areas affected by development, respecting and enhancing the local character of Special Landscape Areas, and promoting sustainable design and construction techniques that contribute to environmental sustainability</p>
NTE/3 Biodiversity;	<p>According to Policy NTE/3 <i>'New development proposals New development should aim to conserve and, where possible, enhance biodiversity through:</i></p> <ol style="list-style-type: none"> a) <i>Sensitive siting; avoiding European protected sites or those of national or local importance;</i>

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	<p><i>b) Sensitive layout and design which avoids impacts or mitigates through an agreed programme for any identified adverse impact on biodiversity;</i></p> <p><i>c) Creating, enhancing and managing wildlife habitats and natural landscapes including connectivity;</i></p> <p><i>d) Integrating biodiversity measures into the built environment;</i></p> <p><i>e) Contributing to achieving targets in the Conwy Local Biodiversity Action Plan (LBAP);</i></p> <p><i>f) Providing for a management agreement with the Local Planning Authority to secure the retention and long term future of biodiversity interests where applicable.'</i></p> <p>In addition to these considerations, all proposals should include a Biodiversity Statement detailing the extent of impact on biodiversity.</p>
<p>NTE/4 Landscape and protecting Special Landscape Areas;</p>	<p>Focuses on safeguarding the county's landscape, particularly Special Landscape Areas (SLAs). Development proposals within designated SLAs must respect and enhance their unique character and distinctiveness.</p> <p>Proposals should also be assessed for their impact on the local landscape character, ensuring that new developments do not harm the visual and environmental quality of these areas with the overall goal of maintaining and improving the quality of Conwy's landscapes, ensuring that new developments harmonize with and enhance the county's natural beauty.</p>
<p>NTE/6 Energy efficiency and renewable technologies in new development;</p>	<p>Policy NTE/6 aims at promoting energy efficiency and the integration of renewable technologies in new developments focusing on encouraging high levels of energy efficiency in building design and construction to reduce energy consumption, promoting the use of renewable energy sources, such as solar panels and wind turbines, in new developments to decrease reliance on non-renewable energy. The policy also advocates for sustainable construction techniques that minimize environmental impact and support the efficient use of natural resources.</p>
<p>NTE/8 Sustainable drainage systems;</p>	<p>Ensures that sustainable drainage practices are implemented where possible and requires justification from developers that a discharge is necessary and will be adequately controlled.</p> <p>Preference for surface water drainage will be for drainage to the following:</p> <ul style="list-style-type: none"> a) Surface water body (river, lake) subject to appropriate treatment; b) Surface water sewer; c) Combined sewer.
<p>NTE/9 Foul water drainage;</p>	<p>Advises that foul drainage to an adopted sewer should be provided wherever possible and development of sites where this is not feasible will only be permitted if proposed alternative facilities are adequate and will not pose an unacceptable risk in terms of pollution.</p>

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NTE/10 Water resources;	NTE/10 focuses on water conservation measures being integrated within all developments. Proposals of 10 dwellings or more should be accompanied by a Water Conservation Strategy.
CTH/1 Cultural heritage;	<p>Focuses on protecting and enhancing the county's cultural heritage by assessing the impact of development on heritage assets. It aims to preserve conservation areas, historic buildings, and archaeological sites whilst promoting heritage regeneration projects.</p> <p>CTH/1 advocates for a support for developments that conserve heritage, ensuring the Welsh language is maintained in development.</p>
CTH/2 Development affecting heritage assets;	Addresses development proposals affecting heritage assets, stipulating that such proposals should preserve or, where appropriate, enhance the significance of heritage assets, including historic landscapes, parks, gardens, listed buildings, scheduled ancient monuments, and other areas of archaeological importance. This policy ensures that new developments respect and contribute positively to the county's rich cultural heritage.
CTH/5 The Welsh language;	<p>In order to support and sustain the long-term being of the Welsh language, developments will be resisted which significantly harm the character and linguistic balance of a community.</p> <p>To assess the impact of any proposed development on the Welsh language, a 'Community and Linguistic Statement' should accompany any housing applications on unallocated sites of ten units or more in the 'Urban Development Strategy Area'. In addition to this, a more details 'Community and Linguistic Impact Assessment' should accompany any housing applications on windfall sites comprising 20 units or more in the 'Urban Development Strategy Area'.</p>
STR/1 Sustainable transport;	Strategic Policy STR/1 aims to minimize travel needs by promoting development in locations with convenient access to walking, cycling, and public transport options. This approach encourages sustainable travel behaviours, reduces reliance on private car use, and enhances service accessibility for individuals with limited transportation options.
STR/2 Parking standards;	<p>Policy STR/2 of the Conwy Local Development Plan (LDP) establishes guidelines for parking provision in new developments within the county. Developments are required to provide parking in accordance with the Council's maximum standards. Additionally, within areas with good accessibility to facilities and services, and served by high-quality public transport, the Council seeks to reduce the amount of car parking provided.</p> <p>This policy aims to balance the need for adequate parking with the promotion of sustainable transportation options, ensuring that new developments support the county's broader objectives for sustainable transport and accessibility.</p>

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STR/3 Mitigating travel impact;	Requires new developments to assess and mitigate adverse travel impacts, such as noise, pollution, and health effects. In certain cases, there will be a requirement to submit Transport Statements or Assessments to demonstrate how they will address these issues.
STR/4 Non-motorised travel;	Aims to promote non-motorised travel, such as walking and cycling, within the county through development. This can be done by considering Development Location and Design, the inclusion of pedestrian and Cycling Infrastructure as well as Integration with Sustainable Transport methods. By implementing these measures, Policy STR/4 seeks to reduce reliance on motor vehicles, thereby promoting healthier lifestyles and contributing to environmental sustainability.
CFS/11 Development and open space; and	Outlines the requirements for new open space within new residential development proposals. New housing proposals of below 30 dwellings will be expected to make a financial contribution through a commutes sum as alternative to on-site provision of open space. This will be done to facilitate local enhancements and ensure that open space is included within all housing proposals, either on-site or through alternative means.
CFS/12 Safeguarding existing open space.	Protects existing open space by refusing to grant permission for developments which result in the loss of open space, unless in an area with an over-provision of existing open space, or where it will be replaced by an acceptable alternate provision. The aim is to protect and retain the parks outdoor spaces and amenity areas which provide considerable benefits to local areas and can be extremely valuable to local communities.

4.6 Conwy County Borough Council also provides Supplementary Planning Guidance (SPG) in addition to the policies listed above. Those relevant to the proposal are listed in the table below:

Table 4.3 Summary of local planning guidance provided by SPG

Policy	Summary
LDP1 Design guide for householders (February 2014);	A practical design tool for individuals planning to build or modify their homes. Adopted as council policy in February 2014, this guide ensures that all new developments, extensions, and alterations to existing properties are well-designed.
LDP2 Parking standards (February 2014);	This guidance outlines maximum parking standards for various types of developments, aiming to reduce car dependency and promote sustainable transportation methods. The SPG emphasizes that in areas with good accessibility to services and high-quality public transport, reduced car parking

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	provisions are encouraged. Additionally, it mandates the inclusion of secure cycle storage facilities in new developments. These standards are designed to manage parking demand, contributing to environmental, social, and economic goals within the region.
LDP4 Planning obligations (July 2014);	This guidance outlines the Council's approach to securing contributions from developers to mitigate the impacts of new developments on local infrastructure and services. These obligations ensure that new developments contribute positively to the community by addressing additional demands placed on public amenities and services.
LDP5 Biodiversity (November 2014);	LDP5 provides detailed guidance on integrating biodiversity considerations into development proposals. The SPG emphasises the importance of retaining existing trees and incorporating new planting within developments to enhance visual amenity and support biodiversity. It also highlights the necessity for biodiversity surveys, adherence to relevant legislation, and the maintenance of natural habitats. This guidance ensures that development projects contribute positively to the local environment by promoting sustainable practices and preserving ecological networks
LDP6 Welsh language (November 2014);	LDP 6 outlines the Council's commitment to supporting and promoting the Welsh language within the planning process. It requires that certain development proposals, particularly larger-scale projects, include assessments of their potential impact on the Welsh language, with housing developments on windfall sites of 20 dwellings or more requiring a 'Community and Linguistic Impact Assessment'. The SPG encourages the use of bilingual signage and the retention of traditional Welsh names for new developments and streets. These measures aim to ensure that new developments contribute positively to the cultural and linguistic heritage of the area, supporting the long-term well-being of the Welsh language
LDP9 Design (July 2015);	Aims to elevate the standards of building and landscape design across all developments within the county. This guidance serves as a practical design tool for developers, architects, and planners, ensuring that new projects harmonize with the existing environment and contribute positively to the area's visual appeal. By adhering to the principles outlined in LDP 9, the Council seeks to promote sustainable development, enhance community well-being, and preserve the unique character of Conwy.
LDP13 Affordable housing (August 2017);	This guidance outlines the Local Planning Authority's (LPA) requirements for incorporating affordable housing into new residential developments, aiming to meet the county's housing needs and promote sustainable communities. It sets out the thresholds for affordable housing provisions and contributions, financial viability assessment for developers to undertake, on-site provision and

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	commuted sums as well as how affordable housing should be well-designed and integrated within developments, indistinguishable from all other dwellings.
LDP24 Renewable energy (February 2017); and	Provides detailed advice to supplement the adopted Conwy Local Development Plan (LDP) policy NTE/6. This guidance aims to promote the development of renewable energy projects within the county while ensuring that such developments are environmentally sustainable and align with local planning policies.
LDP34 Waste storage and collection in new developments (December 2015).	Outlines requirements for waste management in new developments. It advises that residential areas provide designated waste storage areas, with communal facilities for apartment complexes. Non-residential developments must include appropriately sized storage areas, and all developments should ensure easy access for collection vehicles. The guidance emphasizes the need for well-integrated, functional, and aesthetically pleasing waste storage, with proper ventilation and security. The aim is to ensure effective waste management and maintain environmental quality.

4.7 An assessment of the relevance of the above policies and how the proposal complies with them is provided within section 5 of this Planning Statement.

5. Main considerations

Principle of development

Loss of open space

- 5.1 The application site is currently occupied by an existing sports court/MUGA, which would typically represent an area of open space which would be protected under local planning policy. Policy CFS/12 of the adopted LDP safeguards existing open space and states that development will not be permitted which results in the loss of open-space.
- 5.2 As part of the pre-application enquiry for the proposed development, it was established with Conwy County Borough Council (CCBC) Planning Policy that the site had been removed from the open space assessment after falling into redundancy many years ago. As the site is not included within the LPA's open space assessment, it is not considered to be safeguarded as existing open space under Policy CFS/12.
- 5.3 With the above in mind, the site is therefore considered to be a vacant brownfield site containing no safeguarded open space, therefore the loss of the existing open space is justified and acceptable.

Housing development

- 5.4 The site is located within the 'Urban Area' settlement boundary of Llandudno under Policy DP/2. This policy asserts that most new development will take place within or on the fringe of these urban areas, with a target of 85% of housing developments to take place in this settlement tier, through the completion of windfall sites and new allocations. Urban areas are highlighted as a key area for the combination of both open market and Affordable Housing for Local Need (AHLN).
- 5.5 Strategic Policy HOU/1 of the LDP outlines the target for residential development delivery over the plan period, anticipating 426 dwellings being brought forward as windfall developments within Conwy, Llandudno Junction and Llandudno.
- 5.6 The application represent a windfall development providing 100% affordable housing on a site located within the settlement boundary of an 'Urban Area', where residential development is primarily aimed to be located, on previously developed (brownfield) land, therefore, the principle of development is considered to be acceptable, subject to details regarding the proposed housing mix and affordable housing need.

Housing mix and affordable housing

- 5.7 The Local Planning Authority’s guidance regarding affordable housing is set out in Policy HOU/2, requiring affordable housing for local need (AHLN) within all residential developments and setting the threshold for the proportion of housing which must be provided as affordable housing.
- 5.8 Llandudno is within the highest tier for affordable housing where residential developments of two or more dwellings are required to contain 35% affordable housing. As the proposed development includes a 100% provision for affordable housing, it is considered to be acceptable in line with HOU/2.
- 5.9 Policy HOU/5 of the LDP states that development proposals should reflect the requirements in terms of tenure, house types and sizes, as outlined within the Local Housing Market Assessment (LHMA) and the Conwy Affordable Housing and First Steps Registers. Applications should only deviate from this where it can be demonstrated that the local circumstances suggest a different housing mix would better suit local needs.
- 5.10 The proposed development comprises of 100% affordable housing to be provided as social rented housing.
- 5.11 The proposed development comprises of the following housing mix:

Table 5.1 Proposed housing mix

House size	Type	Number of units
5P3B	Semi-detached	2
4P2B	Semi-detached	2
4P2B	Terraced	3
3P2B	Apartment	3
2P1B	Accessible apartments	3
2P1B	Assisted living apartments	6
2P1B	Apartment	10

- 5.12 The development aims to provide smaller units, comprising predominantly of one- and two-bed dwellings, as well as integrating accessible and assisting living accommodation within the scheme.

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5.13 The Conwy LHMA (2022) found there to be a significant shortfall in terms of social housing supply with Conwy's social rental sector contributing 11.6% of tenure types compared to 16.4% across Wales as a whole, representing the second lowest in the country. This has resulted in households who were eligible for social housing being unable to access it due to a limited supply in the area, forcing them into the private rent sector where costs are much higher.

5.14 Table 22 of the LHMA shows that over 50% of the social housing stock within the Conwy region is made up of three-bedroom properties, compared to just 16.3% of one-beds and 29.9% for two-beds. This significantly exceeds the proportion of three-bedroom properties across Wales at 44.2%.

Table 22 Social housing stock by number of bedrooms, March 2016 Source: social landlord stock and rents data, Welsh Government	Conwy County Borough		Wales
	Number	%	%
All general needs dwellings	4,370		
One bedroom	712	16.3%	17.6%
Two bedrooms	1,308	29.9%	35.7%
Three bedrooms	2,200	50.3%	44.2%
Four bedrooms	134	3.1%	2.3%
Five bedrooms or more	16	0.4%	0.2%

5.15 The proposed development would therefore provide much-needed social housing stock of one- and two-bedroom units where the proportion of housing stock within Conwy is lower than can be seen across Wales as a whole.

5.16 The social housing stock within the Conwy region is also dominated by general needs dwellings at 63.8%. The LHMA states that almost a third of non-general needs social housing is designated as either sheltered or extra care housing reserved for over 55s only, therefore further limiting the availability of social housing for families and households who are not eligible for older person's accommodation. The proposed development includes 6 x assisted living apartments and 3 x accessible apartments, all forming one-bedroom units.

5.17 The need for affordable housing in Llandudno was provided by CCBC Housing Strategy within the pre-application stage, outlined in Table 5.2 below.

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Table 5.2 Affordable housing need in Llandudno

	1 bed	2 bed	3 bed	4+ bed
Social rent	504	237	134	81
LCHO	6	75	34	6
Intermediate Rent	110	107	40	11
LCHO or Intermediate Rent	10	28	29	3

- 5.18 Evidently, the need for affordable housing in Llandudno is highest within the social rent sector, particularly for one-bed accommodation, followed by two-beds and three-beds.
- 5.19 The proposed housing mix, comprising of one-bedroom, two-bedroom and three-bedroom units will meet the identified need of Llandudno as a settlement, as well as the wider needs of the Conwy region as it will provide much-needed affordable housing stock, particularly of one- and two-bedroom property sizes where Conwy has a significantly lower proportion than Wales as a whole. The inclusion of accessible and assisted living apartments is also considered to be a welcome one to provide non-general needs accommodation which is not restricted to those over 55.
- 5.20 Pre-application enquiry discussions with the LPA confirmed that the CCBC Housing Strategy were supportive of the proposal and confirmed that the proposed mix would meet an identified need and notes that they would seek for all units to be social rented properties. All properties are proposed as social rental units.
- 5.21 The development is considered to provide an appropriate housing mix based on the Conwy LHMA and the affordable housing register for Llandudno, complying with Policy HOU/5.

Density

- 5.22 Guidance regarding housing density is outlined within Policy HOU/4 as the LPA will seek to achieve a density of 30 dwellings per hectare on large windfall sites of 10 dwellings and above. Higher densities will be sought where it represents a sustainable use of land and does not result in an unacceptable impact, in these cases a density of up to 50 dwellings per hectare can be sought.
- 5.23 The application site comprises of approximately 0.49 hectares, therefore the proposal has a development density of around 58 dwellings per hectare (DPH). This density is significantly higher than the 30 DPH generally sought under point 1 of Policy HOU/4. However, as point 2 of the policy notes, higher densities may be acceptable where it

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represents a sustainable use of land and does not result in an unacceptable impact. It also states that higher density schemes with lower affordable housing provision and negative residual impact will be discouraged.

- 5.24 The proposed development adopts a higher housing density for multiple reasons, as it seeks to make the best use of a brownfield site which is restricted in terms of size by existing properties to the north and east, as well as highways to the south and west. The housing density also appears higher as the proposal is comprised primarily of apartments, comprising 22 out of the total 29 dwellings proposed, which generally have a much smaller footprint per unit than a dwellinghouse.
- 5.25 The proposed housing density is considered to represent a sustainable use of land, adopting a higher housing density to allow for a higher number of smaller residential units, comprising primarily of one- and two-bedroom apartments. Additionally, the scheme features 100% provision for affordable housing and is not considered to result in a negative residual impact on aspects such as residential amenity, which will be explained under a subsequent heading, therefore the higher density is considered to be justified.

Design and appearance

- 5.26 Policy DP/3 aims to ensure that all new development will be of high quality in terms of design, adopting a sustainable approach that provides suitable developments which are appropriate in terms of the local character of the plan area.
- 5.27 As part of criterion a) of Policy DP/3, developments must be appropriate to and enhance their locality in terms of their form, scale, massing and materials. The area surrounding the development site comprises of predominantly two-storey housing with the exceptions of the Ty Hapus Community Centre and Asda supermarket to the east. The neighbouring residential properties within the vicinity of the site comprise of semi-detached and terraced houses, predominantly finished in red-brick, render or pebble-dashing with pitched tile roofs.
- 5.28 The proposed development will front directly onto both Cwm Road and Ffordd Penrhyn and the majority of the dwellings will be visible from the adjacent highways, particularly the apartment block located to the south of the site along Ffordd Penrhyn, the apartments to the west of the site along Cwm Road and the semi-detached dwelling located adjacent to Cwm Road in the north-western area of the site.

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5.29 The proposed development comprises of two-storey properties including a row of terraced dwellinghouses and two semi-detached dwellings fronting the proposed access road from Cwm Road, along with three apartment blocks. All of the proposed buildings adopt a similar design approach forming a coherent and well-designed scheme, comprising of the following materials:

- **Roof** – Slate/concrete tiles;
- **Walls** – Off-white render, grey engineering brick and timber cladding;
- **Windows and doors** – Graphite uPVC and grey artstone surround/cills; and
- **Facia's soffits and rainwater goods** – uPVC.

5.30 The development is considered to appropriately reflect the character of the surrounding area in terms of form and scale and would not be out of place in the local street scene. The proposal adopts a subtle design which will integrate well into the surrounding area with proposed materials which would be not be out of character for the area. Figure 5.1 provides an expected aerial view of the development highlighting its design within the context of the surrounding area.

Figure 5.1 Aerial view of the proposed development



5.31 During the pre-application enquiry stage, Planning Officer's raised initial concerns regarding the site design in relation to the two-storey infill T-shaped building block in the north-eastern site corner, comprising units 24-29. The initial site layout saw the

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northern elevation of this apartment block located approximately 3m from the site boundary and the neighbouring garden beyond. The distance from the side elevation to the adjacent properties to the north also measures at approximately 12.5m.

- 5.32 Amendments have been made to the site layout following the pre-application feedback increasing the separation distance between the apartment block and the site border to around 5m, along with the distance to the neighbouring property to 14.5m. This apartment block also saw a redesign in terms of the footprint and overall layout to address concerns regarding this area of the site appearing 'cramped' and potential adverse impacts in residential amenity such as overlooking, overshadowing and overbearing impacts. The changes made to the layout of the block are considered to address these concerns, with potential impact on residential amenity explored further in the sub-section below.
- 5.33 The scheme includes soft landscaping proposals to enhance the overall appearance of the site through the provision of hedgerows, low shrubs and tree planting throughout. Details of which can be found within a subsequent heading of this section of the Planning Statement.
- 5.34 A Design and Access Statement has been produced in support of the proposed development, detailing the design process and rationale in greater detail.

Residential Amenity

- 5.35 In terms of residential amenity, Policy DP/3 also states that new developments should have regard to the potential impact on adjacent properties. Policy DP/4 adds to this by outlining that planning permission will not be granted in cases where development would result in an unacceptable adverse impact on residential amenity.
- 5.36 The proposed development is located within a largely residential area within Llandudno and directly borders the rear gardens of existing dwellings located along Howard Place along the site's northern boundary. Existing dwellings are also located in the vicinity of the site across Cwm Road and Ffordd Penrhyn.
- 5.37 With the separation distances provided by the adjacent highways and footpaths, the existing properties located between 47 to 45 Ffordd Penrhyn and 1 to 4, 4a and 4b Cwm Road are expected to have sufficient distances between them and the proposed dwellings to negate any potential overlooking or overbearing impact, and no issues are expected in relation to these properties.

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- 5.38 The properties to the north-west of the site along its northern boundary are considered to be the areas which will primarily be assessed for potential impact upon residential amenity. The potential impact upon these properties will be assessed in turn below.
- 5.39 The Rockery, located on Cwm Road, sits adjacent to the proposed site access road in the north-western site corner, with its south-eastern side elevation facing the access road and the front elevations of the proposed terraced housing beyond. As shown on the proposed site plan, The Rockery is expected to be over 20m from the proposed dwellings along the access road and therefore no potential overlooking or detrimental impact is considered to be generated between the dwellings. Similarly, numbers 13 and 12 Howard Place are also located to the north-west of the site and feature an approximate separation distance between their rear elevations and the front elevations of plots 22/23 of 26.8m. Again, there is considered to be little to no potential for issues to arise regarding overlooking or an overbearing element. There are also two trees proposed to be planted which would sit directly between these properties and restrict future views.
- 5.40 It is noted that The Rockery would be located approximately 7m from the internal access road and no. 13 and no. 12 Howard Place 12m. These properties may be subject to a potential increase in terms of noise pollution arising from the internal access road. To address this, appropriate measures have been adopted to mitigate potential noise pollution from the internal access road by planting native hedgerows along the northern site border. This would be expected to reduce the noise levels available from the neighbouring properties to the north-west to an appropriate level.
- 5.41 Number 11, Howard Place, is located just north-west of the proposed apartment block containing units 24-29. The previous site layout, submitted during the pre-application enquiry, raised concerns regarding potential overlooking opportunities between the first-floor lounge of the proposed apartment block and the rear garden of 11 Howard Place. The amended site layout has seen the footprint of the apartment building move as to provide additional separation distance between itself and the northern site boundary, thus providing an acceptable level of distance between the first floor lounge window and the rear garden of 11 Howard Place. Similarly to the points raised previously, the rear garden would border the parking court to serve the apartment block, raising potential for noise pollution which would again be mitigated by the continuation of a native hedgerow along the site border.

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- 5.42 During pre-application discussions, the main concerns regarding potential impact on residential amenity were raised in relation to no.10 and no.9 of Howard Place. Concerns were primarily in relation to the scale and layout of the apartment block allowing for overlooking, overshadowing and providing an overbearing impact on the rear gardens of both properties. In response to this feedback, the apartment block was redesigned with a new layout representing a much less imposing development, with a separation distance between the flats in the north-eastern site corner and the dwellings of 9 and 10 Howard place of 18m. There would also be an approximate distance of 8m between the side elevation of the apartment block and the site boundary. The increase in separation distance and reduction in scale of the apartment block is considered to sufficiently address the concerns raised and lead to the development having an acceptable impact on these properties. The location of the bin store has also been altered to reduce any potential negative amenity impacts, relocating it away from any neighbouring dwellings.
- 5.43 The relocation of the bin store, along with soft landscaping proposals in the north-eastern site corner with trees and hedgerow planting, would be considered to appropriately address any concerns of impacts on no. 8 Howard Place. Any dwellings beyond are considered to not border the site and have sufficient separation distance from the site, and therefore no additional concerns in regards to residential amenity are expected to be generated.
- 5.44 In relation to the potential impact on residential amenity resulting from the development internally, amendments have been made following the pre-application stage to ensure that no proposed dwellings would suffer from an unacceptable level of overlooking or overshadowing.
- 5.45 The footpath between the rear garden of plots 16 to 17 and the side elevation of the apartment block containing plots 11-16 has been widened to 1.5m to ensure that the rear garden of plot 17 is not compromised in terms of overlooking or overshadowing. This amendment would also provide additional separation distance between the rear garden of plot 18, as to reduce the views available from the first floor windows of plots 15, 16 and 17.
- 5.46 The amended site layout is considered to adequately address concerns raised during the pre-application enquiry stage regarding residential amenity, as explored above, and is now considered to be acceptable on these grounds.

Landscaping

- 5.47 In relation to landscaping measures, Strategic Policy NTE/1 and Policy NTE/3 provide guidance regarding how biodiversity should be conserved and enhanced through development proposals, including through the integrating of biodiversity measures into the built environment.
- 5.48 The proposed development intends to enhance biodiversity and green infrastructure by incorporating appropriate soft landscaping measures within the scheme, aimed at creating a visually appealing site which also benefits the natural environment. The proposed landscaping measures are displayed in the proposed landscaping plan submitted in support of this application, an extract of which is included in Figure 5.2.
- 5.49 As detailed within the Green Infrastructure Statement (GIS) produced in support of this proposal, the landscaping scheme has been designed to provide a net benefit in terms of biodiversity with the following aims:
- Native tree planting;
 - Creation of species rich seeded areas;
 - Habitat provision and linkage to adjacent areas; and
 - Provision of habitat and wildlife enhancements with bird and bat boxes and hedgehog highways.
- 5.50 A summary of the habitat extents and planting materials are noted within the GIS. In terms of landscaping measures alone, the development proposes the planting of 21 no. new specimen trees, the creation of 464sqm of grassland areas, 199sqm of low shrub planting and 34sqm of native tree and shrub planting.

Figure 5.2 Extract of proposed site landscaping plan



- 5.51 The planting proposals are located primarily around the site border as well as interjecting between the proposed buildings, aimed at softening the views of the site from the adjacent highways and to link nature with the built environment.
- 5.52 The landscaping measures have taken inspiration from feedback provided by CCBC Ecologist during the pre-application phase, in terms of the native species and ideal areas for landscaping, leading to the creation of an appropriate landscaping plan which is considered to be acceptable and proportionate to the scale of the proposed development.

Ecology

- 5.53 As previously established, the existing site is vacant, brownfield land comprising of the former MUGA with hard surfacing and some minor surrounding areas of ruderal grassland. The baseline ecological condition of the site is subsequently considered to be of low value. CCBC Ecologist confirmed within the pre-application enquiry stage that, due to the existing site condition, a preliminary ecological assessment of the site would not be necessary.
- 5.54 Notwithstanding the existing site condition, nature conservation remains a material consideration, as strategic Policy NTE/1 states that development will be regulated as

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to conserve and, where possible, enhance the natural environment. It outlines the LPA's aim to safeguard biodiversity, habitats and landscapes through protecting sites of importance.

- 5.55 Policy NTE/3 provides additional means through which development should aim to conserve and enhance biodiversity, such as sensitive siting, sensitive layout and design, creation and enhancement of habitats and integrating biodiversity into the built environment.
- 5.56 As detailed in the 'Landscaping' heading, points 1.c) and 1.d) of Policy NTE/3 are considered to have been adopted by incorporating a sensible and effective soft landscaping scheme through which wildlife habitats would be able to be enhanced and biodiversity measures would be integrated into the surrounding built environment.
- 5.57 The site is considered to be of low existing ecological value, comprising of hardstanding and grassed areas of negligible value with low potential for high-quality green infrastructure or habitats. The proposal incorporates a diverse landscaping scheme, comprising of native vegetation species, habitat creation and wildlife enhancement measures. Due to the low existing ecological condition of the site, the proposal is considered to provide a significant improvement to the site in terms of biodiversity and connectivity to the natural environment. It is therefore considered to be appropriate in regards to Policies NTE/1 and NTE/3.
- 5.58 According to Chapter 6 of Planning Policy Wales (PPW), all planning applications must be accompanied by a Green Infrastructure Statement (GIS) identifying how biodiversity and ecological considerations have been incorporated within a proposed development to provide a net benefit in terms of biodiversity which is proportionate to the proposal.
- 5.59 A GIS is submitted in support of this application, produced by Tirlunbarr Associates, detailing the biodiversity considerations relating to the site and the appropriate measures adopted to provide a net benefit to biodiversity.

Lighting

- 5.60 The development would include lighting within the proposals for additional street lighting and associated lighting for the buildings, walkways and amenity areas such as the bin stores. The site is located within a residential area where properties would be expected to generate additional lighting as well as the existing street lights located along both Cwm Road and Ffordd Penrhyn.

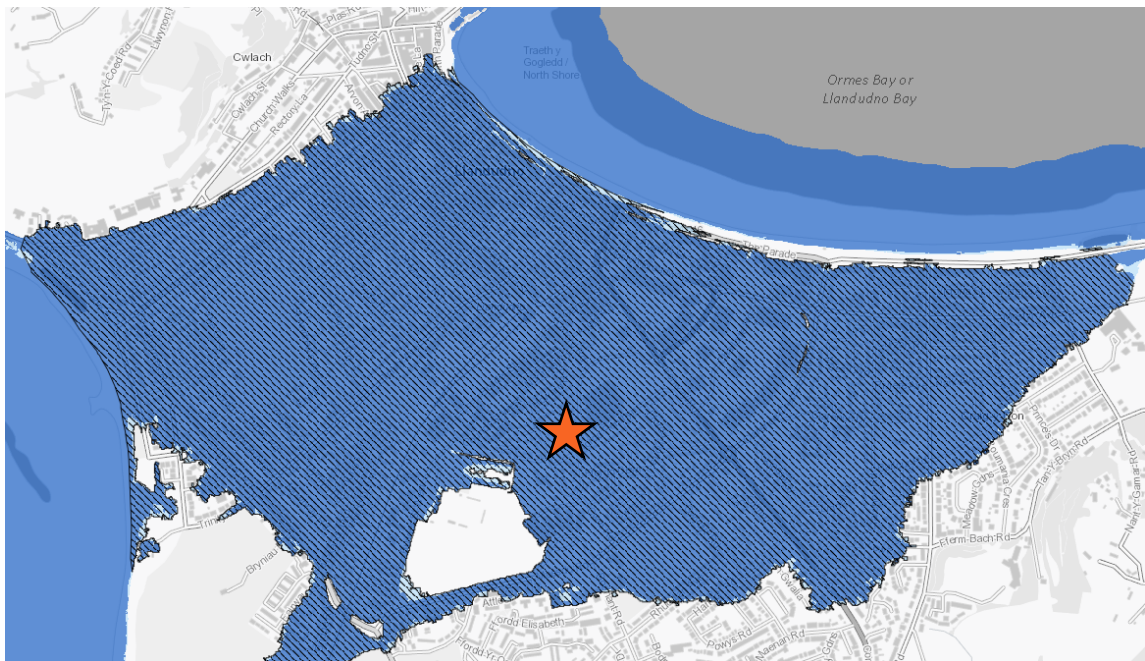
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- 5.61 The proposed site access road would be intended for adoption, therefore details regarding the lighting scheme along this part of the site would subject to details submitted for an agreement with the Local Highway's Authority.
- 5.62 The private access to both proposed parking courts, along with the dwellings themselves, would be subject to separate lighting details and a lighting scheme, to be submitted at a later date and agreed upon with the Local Planning Authority.

Flood risk

- 5.63 The application site forms part of the TAN15 Defended Flood Zone and is within a Flood Zone 3 area within NRW's 'Flood Map for Planning' (FMfP) as shown within Figure 5.3. According to the FMfP, Flood Zone 3 areas, which the site lies within, have a combined 1% risk of flooding from rivers and sea, including climate change. However, it is accepted in this case that Llandudno is recognised as being within a defended flood zone which benefits from significant sea defence infrastructure.

Figure 5.3 Site location within the Flood Map for Planning (NRW)



- 5.64 Policy DP/4 of the LDP states as part of the development criteria that planning permission will not be granted in cases where development would result in an unacceptable adverse impact on flooding and flood risk.

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- 5.65 TAN 15 also provides technical guidance regarding development and flood risk, advising on development and providing a framework for flood risk to be assessed. The TAN uses the Development Advice Maps (DAM) to base its assessment on flood risk. Based on the DAM, which is more outdated in comparison to the FMfP, the application site is located within a C1 flood risk area, an extract highlighting the site location on the DAM is included in Figure 5.4.
- 5.66 It is noted that at the time of writing an updated TAN 15 is expected to be published in the near future, therefore by the time this proposal reaches full planning stage it is likely to be subject to scrutiny against the new TAN 15. Nonetheless, the existing TAN 15 (2004) currently provides the relevant technical guidance, and therefore for the purposes of this Planning Statement, the proposed development will be assessed against it in its current form.

Figure 5.4 Site location within the Development Advice Map (NRW)



- 5.67 TAN 15 sets out the various zones adopted on the DAM, with C1 areas described as developed areas served by significant infrastructure, including flood defences. Within these areas development is permitted to take place subject to application of a justification test, including acceptability of consequences.
- 5.68 Within the TAN, different tiers of development are set out based on potential flooding vulnerability between emergency services, highly vulnerable development and less

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vulnerable development. Residential development is categorised as ‘Highly vulnerable development’ for the purposes of TAN 15.

- 5.69 Section 6 of TAN 15 outlines the justification for the location of development. It states that new development should be directed away from zone C areas and all new development within zones C1 and C2 will only be permitted if determined by the planning authority to be justified in that location. Development will only be justified if it can be demonstrated to meet the following criteria:

i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or

ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region;

and,

iii. It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig 2.1); and,

iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable.’

- 5.70 In regards to the criteria above, these have been assessed against the proposed development within page 12 of the Flood Consequences Assessment (FCA) submitted as part of this PAC.

- 5.71 The intention is not to repeat the contents of the FCA, however in regards to the relevant criteria above:

Point i. The proposal would represent the redevelopment of brownfield land, having lost its status as protected open space after falling into disuse and disrepair, to provide new 100% affordable housing which would contribute to the LPA’s regeneration initiatives to meet the need for social housing.

Point iii. The site features a derelict MUGA comprising primarily of hardstanding surfacing, therefore it meets the definition of previously developed land.

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Point iv. TAN 15 requires demonstration that the site will remain flood free for the lifetime of the development for the 0.5% AEP plus climate change event including a defence breach. Flood depths of up to 1.47m are estimated in the 0.5% AEP plus climate change west shore breach event and these levels are not considered to be feasible.

- 5.72 It is worth noting that a recent proposal for 77 no. affordable dwellings off Builder Street, Llandudno, was given planning consent by CCBC, planning permission reference 0/48144. In this case, the same assessment was made from the FCA and relevant guidance of TAN 15 that the site would be required to be raised by approximately 1.5m to remain flood free, with it being acknowledged by the applicant that this level of ground raising would not be feasible. This led to opposition from NRW in their consultation of the application on flood risk grounds based on TAN 15. This application subsequently gained planning approval based on the need for affordable dwellings within Llandudno overriding the issues raised on flood risk grounds. This is considered relevant to the proposed application as the scheme for Tŷ Hapus features a higher ground level compared to the consented scheme mentioned above, therefore a lower degree of flood risk would be expected than that previously consented.
- 5.73 In regards to potential flood risk, please refer to the submitted FCA and Hydraulic Modelling Report for a detailed assessment. As an overview, the site is recognised as within a flood risk area subject to flood resilience infrastructure and flood defence measures, based on both the FMfP and DAM. The FCA found that the site is at risk of tidal flooding and flood depths of up to 1.47m or 2.01m are estimated to be reached in the case of a breach event. To comply with TAN 15, particularly part A1.14, site levels would need to rise by 1.56m. This is not considered to be a feasible or realistic option.
- 5.74 To reduce the potential flood risk of the site, site levels will be raised to a point as high as feasibly possible. The site would also incorporate flood resilience measures in the case that any flood event is experienced, in order to ensure that the site would be prepared as best as possible to mitigate the impact of any future event.
- 5.75 Based on the assessment of the site in regards to flood risk, the level to which the site would need to be raised to conform with TAN 15 is not considered to be an adoptable approach from a viability perspective. Therefore, a flood resilience approach has been adopted to deal with potential flood risk. The principle of developing highly vulnerable development within Llandudno has been established by the approved site at land at

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Builder Street, under planning permission reference 0/48144. In terms of flood risk, the proposed development is therefore considered to be acceptable.

Open Space Assessment

- 5.76 According to Policy CFS/11 of the Conwy LDP, an Open Space Assessment is required for major residential developments in order to dictate the required level of open space provision, either to be provided on-site, off-site or through a financial contribution of a commuted sum.
- 5.77 Point 1 of Policy CFS/11 outlines the Council's standards for open space of 3 hectares per 1000 people comprising of:
- 1.2 hectares for playing pitches;
 - 0.4 hectares for outdoor sport;
 - 0.8 hectares for children's playing space; and
 - 0.6 hectares for amenity open space.
- 5.78 Point 1 also states that on-site provision for open space must be made in accordance with the standards set out above, applicable to new housing development of 30 or more dwellings. As the proposed development comprises of 29 dwellings, provision of on-site open space is not considered to be necessary.
- 5.79 Point 3 of CFS/11 states that:
- 'New housing development of less than 30 dwellings shall make provision of a commuted sum as an alternative to on-site provision, in line with the Council's standard for open space of 3 hectares per 1,000 population.'*
- 5.80 As the proposed development is below the 30 dwelling threshold, the contribution of a commuted sum towards open space is considered to be sufficient. Details of the commuted sum are assessed under the 'Planning Obligations' heading below.

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- 5.81 Policy DP/5 of the adopted Conwy LDP requires, where appropriate, developers to provide adequate contributions to meet the need of infrastructure requirements arising from a proposed development, in terms of social, economic, physical and environmental aspects. Contributions will be sought in line with the priority mechanisms, as set out in the Council's 'Planning Obligations' SPG.

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5.82 The pre-application response for the proposed development, reference DC/ENQ/33290, provided details of the planning obligations required for the proposed development covering affordable housing, waste, open space and libraries. The obligations as outlined from the LPA are included within Figure 5.5.

Figure 5.5 Planning obligations required as per PPE reference DC/ENQ/33290

Details of Planning Obligations Required:

Affordable Housing					
On-Site Affordable Housing Provision					29
Waste					
Sum required for Waste provision					£2,349.00
Open Space	Amount generated (sqm)	Amount provided on-site (sqm)	Maintained by developer in perpetuity	Cost of provision	Cost of maintenance
Playing Pitches	516	0	Yes	£6,032.04	£0.00
Outdoor Sports	172	0	Yes	£2,010.68	£0.00
Major Amenity	129	0	Yes	£1,508.01	£0.00
Children's play space (equipped)	57.5	0	Yes	£2,184.43	£0.00
Children's play space (informal)	126.5	0	Yes	£1,442.10	£0.00
Neighbourhood amenity	129	0	Yes	£1,508.01	£0.00
Totals	1130	0		£14,685.27	£0.00
Sum required for Open Space provision					£14,685.27
Libraries					
Sum required for Library provision					£4,063.50
Total Planning Obligations					£21,097.77

5.83 The total financial contribution expected to be required in relation to planning obligations would be £21,097.77. The planning obligations imposed would be secured by a Section 106 legal agreement between the applicants and CCBC.

5.84 It is considered that the obligations listed within Figure 5.5 are the main areas required in relation to the proposed development, however it is noted that the pre-application response does not cover considerations of education capacity and the possibility of a financial contributions towards nearby schools. As such, this is detailed below.

Education capacity

5.85 Section 10 of the SPG relates to educational facilities where contributions may be sought towards additional educational facilities or upgrading, extending or remodelling of existing facilities if the implementation of development would result in the generation of additional pupils in excess of the capacity of local schools.

5.86 Contributions will be sought from proposed developments of 10 or more dwellings which have the potential to result in an increase in the demand on local schools.

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5.87 The SPG adopts a calculation for the number of dependant children expected to be created from a development within Appendix 4. The rationale for the number of dependent children for each age group, assessed against the proposed development is shown below in Table 5.3.

Table 5.3 Expected number of dependent children created from proposed development

Number of bedrooms	Expected occupancy rate of dependent children (aged 3-18)	Number of dependent children
1	0.03	0.57
2	0.15	1.2
3	0.46	0.92
4	0.66	0
5+	0.77	0
Total		2.69

5.88 As displayed within Table 5.3, the proposed development would be expected to result in the addition of 2.69 dependent children requiring enrolment within nearby education facilities. The capacity of nearby schools will therefore be assessed, focusing on primary and secondary schools as this is where the highest proportion of children would be expected to need to be enrolled within.

5.89 The development site is located within close proximity to various existing educational facilities, with those within 1km listed below along with their capacity figures as of September 2024.

Table 5.4 School capacity figures for nearby education facilities, September 2024

School	School type	Total capacity	Student enrolled	Capacity for additional students
Ysgol Morfa Rhianedd	Primary school	170	134	36
Ysgol Tudno	Primary school	226	161	65
Ysgol Bendigaid William Davies	Primary school	179	116	63
Ysgol John Bright	Secondary school	1,469	1,118	351

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5.90 Evidently, there is significant capacity within the existing education system within Llandudno in the schools nearby to the application site, particularly Ysgol Morfa Rhianedd primary and Ysgol John Bright secondary, both of which are located just south of the site along Cwm Road. It is therefore considered that sufficient capacity exists within the existing nearby schools to accommodate the proposed development, meaning that a contribution towards education infrastructure will not be necessary.

Welsh language and culture

5.91 The Welsh language plays a vital role in the social, cultural and economic life of the residents and visitors of the Conwy County area. In order to conserve and enhance the long-term viability and well-being of the language, the LPA will resist development which would significantly harm the character and linguistic balance of a community in line with Policy CTH/5 of the LDP.

5.92 Criteria 2.d) of Policy CTH/5 requires a detailed assessment of the potential impact of a proposed development upon the Welsh language for windfall housing developments of 20 units or above in the 'Urban Development Strategy Area', this is to be provided through a 'Community and Linguistic Impact Assessment'. As the proposed development meets this criteria, a Community and Linguistic Impact Assessment (CLIA) has been prepared and submitted as part of this PAC.

5.93 The proposed dwellings would meet an identified need for social rented housing units in Llandudno to meet the needs of local people. The proposed housing mix is supported by the Housing Strategy section of Conwy County Borough Council.

5.94 By virtue of the nature of the proposed development, it is not anticipated that the proposal would result in change to the local population in a way which could negatively effect upon the Welsh language characteristics of the area of Llandudno as the dwellings would meet the needs of local people who are already living in the community.

5.95 When considering the overall effect of the proposed development on the Welsh language in Llandudno, an important consideration, is the effect on the proportion of Welsh speakers.

5.96 The site lies within the development boundary of Llandudno in a residential area close to a wide range of local services and facilities where 17.3% of the population spoke Welsh in 2021. As future residents are expected to be already living in the local community, no change in the proportion of Welsh speakers in Llandudno is expected.

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5.97 On balance, the development is not expected to have a detrimental effect on the proportion of Welsh speakers in the community of Llandudno but would provide a beneficial effect in terms of enabling local people to meet their housing need and remain living in their local communities.

Cultural heritage

5.98 The application site falls within the designated Creuddyn and Conwy Historic Landscape, an area which is safeguarded under Policies CTH/1 and CTH/2 of the LDP, and is also located approximately 300m south of the Llandudno Town and Seafront Conservation Area.

5.99 Policy CTH/1 ensures that the Council protects and enhances its cultural and heritage assets, including conservation areas and historic landscapes. Policy CTH/2 states that development which would affect an historic landscape or conservation area must preserve or enhance that asset appropriately.

5.100 The site is located within an urban, residential setting, within a street scene dominated by contemporary properties of a mid-to-late 20th century style. The immediate area surrounding the site is therefore not considered to be of particular value to the historic landscape or neighbouring conservation area. The proposed development would be expected to have minimal impact upon the overall value of the historic landscape and its primary areas of interest or the Llandudno Conservation Area.

Drainage

5.101 Policy NTE/9 states that foul drainage should be discharged via an adopted sewer wherever possible. The proposed development intends on connecting to the local mains sewer to foul waste disposal, with an initial enquiry to DCWW raised no concerns regarding the capacity of the sewerage network of wastewater treatment works to accommodate flows from the site and suggested a preferred connection point.

5.102 As of 7th January 2019, all new developments of more than 1 dwellinghouse requires sustainable drainage systems (SuDS) as means of dealing with surface water. The SuDS must be designed to Statutory SuDS Standards and approved by the local authority acting as SuDS Approval Body (SAB).

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- 5.103 During porosity testing of the application site, it was found that the ground was unsuitable for infiltration. Subsequently, an alternative method was pursued and DCWW confirmed sufficient capacity was available within the existing surface water network to deal with surface water, which would then be discharged to the sea 1.5km from the site. In addition to this, the proposal incorporates various SuDS features, such as rain garden planters along the access road, waterbutts and permeable paving for parking bays where possible.
- 5.104 Please see the Drainage Strategy and Drainage Scheme for more details.

Land contamination

- 5.105 The application site was first identified as having potential for land contamination from a Phase 1 desk study report undertaken and submitted as part of the pre-application enquiry to the LPA. Within this report, the site was identified as having risk of land contamination due to its proximity to an identified nearby landfill, a former gas works and associated railway line. This report found there to be a low to moderate risk of land contamination of the proposed development site.
- 5.106 To follow-up from the Phase 1 report, a Phase 2 Geotechnical report has been produced with the purpose of providing an assessment of site conditions in relation to its potential for proposed residential use in relation to potential contamination of the site.
- 5.107 The application site was confirmed to have low levels of gas flow during the ground gas assessment, with the site being located within an area with low radon risk. It also concluded that the site has a thin layer of Made Ground which is not considered a ground gas risk and the site did not appear to pose a risk to Controlled Water.
- 5.108 For further details see the Phase 2 Geotechnical Survey Report.

Highways and transport

- 5.109 Vehicular and pedestrian access to the site will be provided by a new access road which will extend from Cwm Road into the application site in the north-western corner of the site, connecting to an internal access road. The site access point and internal road will be constructed to CCBC Highways standards with the intention of being adopted.

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5.110 The internal access road would then deviate to the north-east and south-east connecting to two separate parking courts. Figure 5.6, below, shows the internal access road, including the Section 38 adoption extents in pink. It also shows the visibility splay for the site access. For the detailed version, see 'SK38P1 Section 38 Scheme Layout'.

Figure 5.6 Proposed site access visibility splay & internal access road



5.111 Relevant guidance regarding highways and transport considerations are provided by PPW and TAN 18. In terms of local policies, Policy DP/4 of the LDP requires proposals to provide 'Safe access from the highway network', along with enhancements to infrastructure for cycling, walking and public transport, where possible. Policy DP/4 also refuses developments which would result in an unacceptable adverse impact in terms of traffic generation.

5.112 The application site is located within a residential area where roadside parking, particularly along Cwm Road, is common. Subsequently, the speeds at which drivers would be expected to be travelling at would be expected to rarely reach 30mph and be more likely to be between 15-20mph. Cwm Road, which the proposed site access would be extending from, is an adopted highway which travels in a straight direction towards the north and south. A desktop assessment of the area would suggest that

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there would be minimal obstructions in terms of visibility from the proposed access and a connection to the road at this point would be expected to be suitable.

- 5.113 The proposal relates to the erection of 29 dwellings, including 19 one-bedroom dwellings, 8 two-bedroom dwellings and 2 three-bedroom dwellings. With this in mind, the development would be expected to result in a material increase in vehicular movements along Cwm Road and Ffordd Penrhyn. It is noted that due to the inclusion of assisted living apartments and accessible apartments, it would be reasonable to expect the number of occupants who would drive/rely on private transport to be reduced.
- 5.114 The site is also located within a highly sustainable location, with strong public transport links and infrastructure to support travelling by cycling and walking, which would reduce reliance on private travel by car. This will be explored in greater detail in the following sub-section.
- 5.115 The application site is also located within walking or cycling distance to key amenities and services such as schools, supermarkets and train station, further reducing the need for reliance on private transport.
- 5.116 Overall, the development would not be expected to result in an unacceptable increase in vehicular movements along the adjacent highways as long as adequate site access was provided, ensuring that highways safety is retained.
- 5.117 The proposal includes provisions to enhance infrastructure within and surrounding the site for pedestrians, such as providing a new footpath along the northern side of Ffordd Penrhyn. This would allow for safer travel by foot around the application site towards the Asda Superstore to the east. The site would provide pedestrian access at the access road, as well as at separate access points along both Cwm Road and Ffordd Penrhyn providing access to the apartment blocks and to the internal parking court. The development would also be expected to include tactile pedestrian crossing points along and adjacent to the application site to improve pedestrian connections in accordance with the Active Travel (Wales) Act 2013.

Sustainability

- 5.118 PPW supports and advocated for the transport hierarchy, which prioritises sustainable transport methods over private transport, including walking, cycling, and public transport. TAN 18 encourages developments to be located in areas where sustainable

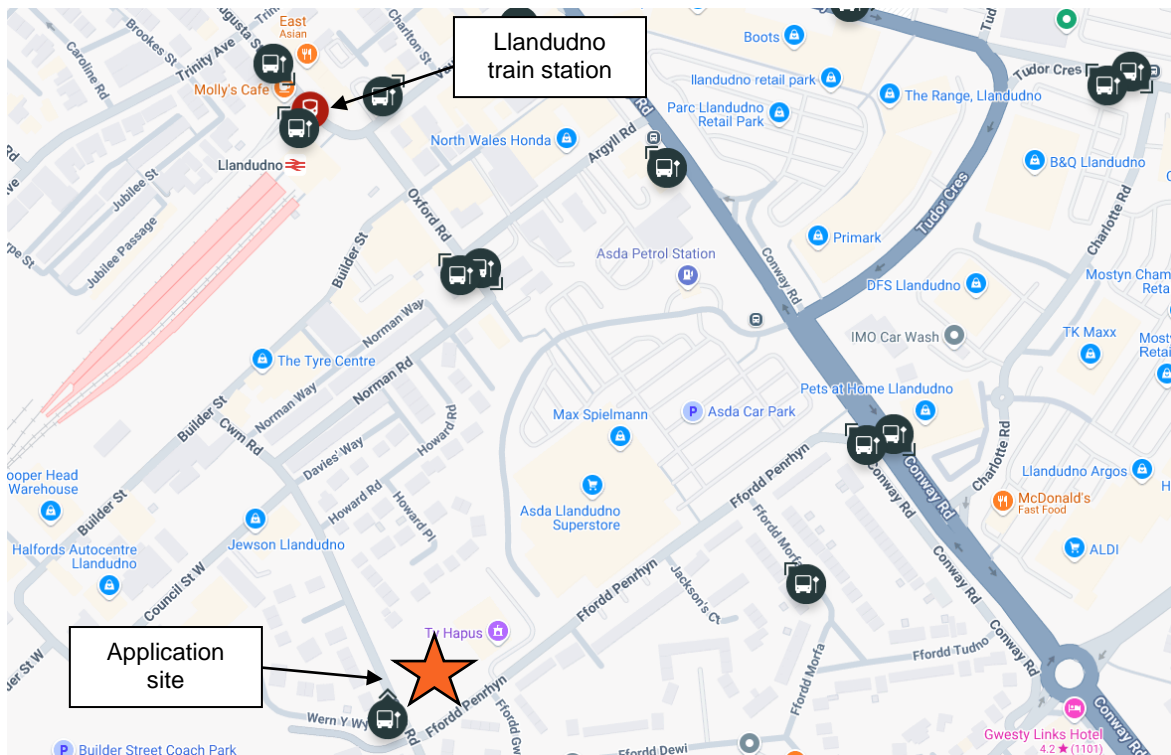
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transport methods would be more easily adopted, aimed at reducing car dependency and increasing social inclusion.

- 5.119 The Active Travel (Wales) Act 2013 focuses on walking and cycling as a mode of transport and highlights the importance of planning and building walking and cycling infrastructure, as well as encouraging behaviour change in Wales.
- 5.120 At the local level, Strategic Policy STR/1 outlines the Council's plans for development to be located as to minimise the need to travel, encouraging convenient access to be provided via footways, cycle infrastructure and public transport as means of encouraging these methods of transport for short journeys. Point a) of this Policy encourages future development to be located in highly accessible locations, either along the A55 expressway, near existing railway lines and within or on the edge of the 'Urban Development Strategy Area'.
- 5.121 Llandudno is identified as an 'Urban Area' within the LDP and is therefore considered to be a highly accessible and sustainable settlement. Llandudno benefits from significant public transport infrastructure, with bus stops and a railway station, as well as a number of active travel routes to encourage walking and cycling. The settlement features numerous schools, post offices and banks, along with the Mostyn Champneys retail park, promenade and high-street which provide vast retail and employment opportunities.
- 5.122 The application site sits around 300m to the west of Conway Road, which serves as the primary highway providing direct access between Llandudno and the A55 North Wals Expressway. The site is also located within close proximity to a number of bus stops, which run services throughout Llandudno and to surrounding settlements, as well as to Llandudno railway station just 500m to the north.

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Figure 5.7 Extract of Traveline Cymru Travel Map showing public transport



- 5.123 Based on the significant infrastructure for public transport, as shown within Figure 5.7, the site is considered to be within a highly sustainable location in relation to public transport access.
- 5.124 Due to its urban location and proximity to key areas within Llandudno, such as the retail park, promenade and high street, the application site is considered to be highly accessible by foot and cycling. Policy STR/4 of the LDP encourages development to support increased levels of non-motorised travel including cycling and walking, particularly by locating development in areas that can provide opportunities to walk or cycle to areas of employment, retail and schools. The application site would meet all of these criteria.
- 5.125 The site is located directly adjacent to Ysgol Morfa Rhianedd primary school and just 400m walk from Ysgol John Bright secondary school, therefore most occupants of the development would be expected to walk or cycle to school. The site is also just 200m west of the Asda supermarket and only 500m walk from the Mostyn Champneys Retail Park. The site is within a walkable distance of most key amenities and reliance on private cars would be expected to be low as a result.

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retail areas which would encourage travel by cycling and by foot. Therefore the site is considered to be acceptable under Policies STR/1 and STR/4.

Parking

- 5.130 The development includes provision for 36 parking spaces for the dwellings and 3 visitor parking spaces and has attempted to make effective use of available space, without providing an excessive number of parking spaces and infringing on areas designated for landscaping and green infrastructure, finding an appropriate balance.
- 5.131 Policy STR/2 outlines the Council's view on parking provisions which should be set out in accordance with the maximum standards, aimed at reducing dependency on cars and promoting more sustainable forms of transport. The Policy also allows for lower provisions of parking spaces for sites with good accessibility to facilities and services which are served by high quality public transport. In terms of the minimum and maximum parking standards, these are set out within the 'Parking Standards' SPG.
- 5.132 Based on the minimum parking standards rationale, according to the SPG, the proposed development would require 41 on-site parking spaces to match the 41 bedrooms along with 6 on-site parking spaces for visitors. The proposal therefore has a shortfall of 5 resident spaces and 3 visitor spaces compared to the Council's parking standards. In cases where the proposed parking provision is below the Council's minimum standards, justification must be provided regarding the site's sustainability in accordance with the site's sustainability score, the rationale for which is outlined within Appendix 6 of the SPG.
- 5.133 The sustainability score for the application site has been calculated in accordance with the SPG's rationale and included within the table below.

Table 5.5 Sustainability score for application site based on 'Parking Standards' SPG

Sustainability criteria	Maximum walking distance	Local services	Sustainability score
Local facilities	200m	Ysgol Morfa Rhianedd Ysgol John Bright Asda Superstore	6
	400m	Ysgol Tudno	2
	800m	Llandudno General Hospital Aldi supermarket	2

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		Llandudno Smiles dental clinic	
Public transport	200m	Bus stop at Ysgol Morfa Rhianedd	3
	400m	Bus stops at Llandudno Fire Station & Llandudno Police Station	2
	800m	Llandudno railway station	1
Cycle route	200m		0
	Frequency		
Frequency of public transport within 800m (operating consistently between 7am-7pm. Deduct one point for service not extending to these times)	5 minutes		0
	20 minutes	Buses from the stop opposite the Fire Station on Conway Road run on average one every 20 minutes providing various services	2
	30 minutes		0
Total			18

5.134 Based on the sustainability assessment outlined within Appendix 6 of the SPG, the application site is considered to score a total of 18 sustainability points.

5.135 Paragraph 10.6.2 of the SPG applies the sustainability score to reductions in parking requirements and, in the case of residential development, a score of 10 points or above allows for a reduction of 2 parking spaces per dwelling. However, outside of Zone 1 City Centre locations the reduction of parking requirements for residential units is not permitted to fall below one space per dwelling.

5.136 Applying the parking reductions permitted by the sustainability score of the site, the proposal would be required to provide 29 off-site parking spaces in total with a minimum of one per dwelling. The provision of 36 designated parking spaces and 3 visitor spaces therefore exceed the minimum requirements of the Council's parking standards due to its highly sustainable location, and is considered to be acceptable.

Waste collection

5.137 Waste bins will be stored within communal waste areas for each apartment block and within the rear garden for each dwellinghouses, with convenient access provided to kerbside collection points, as outlined on the proposed site layout plan. These will provide the necessary storage for each type of waste as per CCBC requirements in terms of general and food waste along with separate compartments/bins for recyclable materials.

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5.138 It is understood that the Council's collection policy are that all waste collections are made at the point where the property meets the public road and therefore necessary arrangements would be made for bins to be brought to the relevant kerbside collection points for collection.

Utilities and services

5.139 As part of the undertaking of PAC, the local utility providers will be contacted to provide comments on the proposed development. These will include Dŵr Cymru Welsh Water (DCWW) as a statutory consultee, as well as Wales & West Utilises who were identified as the local utilities provider within the Council's pre-application response. Comments would be expected to be provided on potential connection points, capacity within the existing infrastructure along with any other feedback felt necessary.

5.140 A desktop search of the area's postcode confirmed that full fibre broadband connection is available within the vicinity of the site and would reasonably be expected to be available to the proposed dwellings, with a gigabit connection point to be confirmed.

6. Conclusion

- 6.1 The proposal relates to a residential development for the erection of 29 affordable dwellings along with the formation of new vehicular access from Cwm Road, creation of new internal access road and parking area, together with associated works for landscaping and drainage infrastructure. The application would be subject to submission of a full planning application.
- 6.2 The proposed development exceeds the 10 dwelling threshold of the Planning (Wales) Act 2015 (the Act), therefore the undertaking of a pre-application consultation (PAC) period is required.
- 6.3 The proposed development has been subject to a pre-application enquiry submitted to the Local Planning Authority in January 2025, reference number DC/ENQ/33290.
- 6.4 The site lies within the settlement boundary of the Urban Area of Llandudno and would represent the redevelopment of a former multi-use games area (MUGA) on land to the west of the Tŷ Hapus Community Centre, Ffordd Penrhyn, Llandudno.
- 6.5 The application site is considered to be brownfield land as the former MUGA has fallen out of the Council's designated open space due to disuse in previous years. Therefore, development of the site to provide 100% affordable housing on previously developed land within the development boundary is considered to be acceptable in principle.
- 6.6 The scheme adopts a housing mix which aims to meet the needs of Llandudno as well as the wider Conwy area contributing towards the much-needed supply of social housing. The evidence provided from the LHMA and social housing registers are considered to justify the housing mix and it is considered to be acceptable on this basis.
- 6.7 The proposal is considered to be of high quality design in terms of layout, scale and proposed materials. The development is expected to integrate well into the local street scene with neutral colours and materials to be used and appropriate massing and size in relation to the surrounding area, which comprises primarily of two-storey properties.
- 6.8 The site lies within a C1 flood zone and within TAN 15 residential development is considered to be highly vulnerable development which should be located away from flood zone C areas unless justification can be provided. An FCA has been produced to assess the potential flood risk of the application site which concluded that the site would need to be raised by approximately 1.5m to remain flood free in accordance with TAN

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15. This level of ground raising is not considered to be feasible, therefore the ground level has been raised to a level which is considered to balance practicality and flood resilience. The proposed development adopts a flood resilience approach with flood resilience measures included within the design of the site. Other schemes within the C1 flood zone have been previously approved without conforming with TAN 15, such as the Builder's Street development, application reference 0/48144, due to the need for affordable housing taking precedent over perceived flood risk. The proposed development is therefore considered acceptable in terms of flood risk.

- 6.9 Amendments were made to the site layout following the Local Authority's pre-application feedback to address concerns regarding the potential negative impacts on residential amenity, particularly regarding the T-shaped apartment block and the north-eastern corner of the site. These alterations to the site layout are considered to reduce potential for overlooking and overshadowing between the proposed development and the neighbouring properties. Overall, the proposal is considered to be acceptable in terms of potential impact on residential amenity in its current layout.
- 6.10 As demonstrated throughout this report, the proposal has been subject to various other material considerations and assessed in accordance with relevant adopted policies within the LDP, as well as overarching principles of PPW, Building Better Places and various national planning frameworks. After the detailed analysis provided, the proposed development is considered to be acceptable and should therefore be supported.

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