

PLANNING STATEMENT

Land east of Llanrwst Road, Gyffin, Conwy

Prepared on behalf of

**The Applicant – Beech Developments (NW) Ltd on behalf of
Adra (Tai) Cyfyngedig**

January 2026



Address:

5 Portal Business Park, Eaton Lane,
Tarpole, Cheshire, CW6 9DL



Telephone:

07506 279 147



Email:

enquiries@grimsterplanning.co.uk

CONTENTS

Section Number	Section Title	Page Number
1	INTRODUCTION	1
2	SITE CONTEXT	2
3	PLANNING HISTORY	7
4	PROPOSED DEVELOPMENT	8
5	PLANNING POLICY CONTEXT	15
6	TECHNICAL AND POLICY ASSESSMENT	24
7	CASE FOR DEVELOPMENT	49
8	CONCLUSIONS	52

1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Beech Developments (NW) Ltd on behalf of Adra (Tai) Cyfyngedig (hereafter referred to as the "Applicant").
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the "Application"), submitted to Conwy County Borough Council for the proposed development of Land east of Llanrwst Road, Gyffin, Conwy (hereafter referred to as the "Site").
- 1.3. The description of development for which detailed planning permission is sought, as stated on the Application Form, comprises the following:

"Erection of 95 no. dwellings and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new sub-station"

- 1.4. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement.

Pre-Application Consultation (PAC)

- 1.5. To inform this Application, the Applicant has engaged in formal pre-application consultation with Officers at Conwy County Borough Council regarding the Site's development potential. A formal Pre-Application response to the initial scheme proposal was issued on 26th October 2023.
- 1.6. Furthermore, and in accordance with the statutory requirements set out in Welsh Government Guidance, the Applicant has undertaken pre-application consultation with the local community for the proposed 'major' development (by virtue of its scale in excess of ten dwellings).
- 1.7. Full details, including the feedback/comments received and how these are addressed by the Applicant, are documented in the Pre-Application Consultation Report submitted with the Application.

2 SITE CONTEXT

2.1. This Section of the Statement provides details of the Site, namely its location, description, and locational sustainability.

Site Location

2.2. The Site lies within the administrative area of Conwy County Borough Council, within the Ward of Conwy and the community of Gyffin.

2.3. The Site is located at the southern of the town of Conwy (and Gyffin) and would represent a logical and natural extension to it.

2.4. In respect of its surrounding character, the Site is adjoined to the north and west by existing residential development located on Isgoed and Allt Y Coed, and Llanrwst Road, respectively. These typically comprise two-storey, semi-detached residential properties. The presence of these existing dwellings, along with Llanrwst Road, has a direct urbanising influence on the Site.

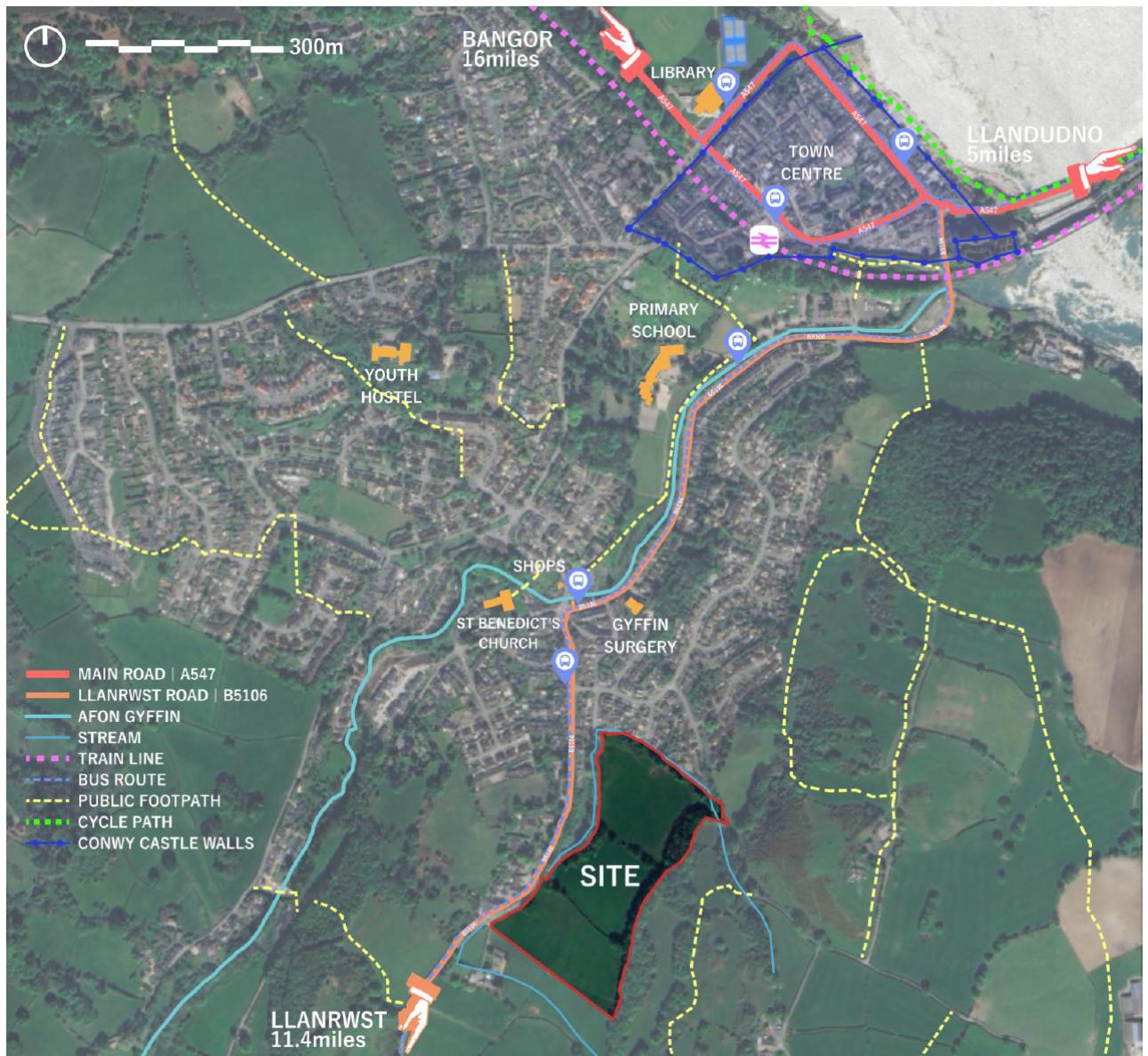
2.5. There is existing, well-established tree and hedgerow coverage along the western edge of the Site, which provides a physical and visual separation from some of the existing dwellings situated to the west.

2.6. The land to the east and south comprises countryside; the land to the east is separated from the Site by existing dense vegetation. To the south-west lies an existing farmhouse and outbuildings

2.7. In view of the topography of the land, the land beyond the Site to the east is physically and visually detached from the Site.

2.8. An aerial image of the Site is provided in *Figure 1* below:

Figure 1: Aerial Image of the Site



Site Description

- 2.9. The gross Site area extends to c. 5.34 hectares inclusive of the proposed access. The net developable area (excluding the public open space and amenity space) extends to c. 2.39 hectares.
- 2.10. The Site currently comprises greenfield, agricultural land. It consists of semi-improved neutral grassland with a moderately diverse species composition within the northernmost fields. The southernmost fields are used as grazing land.
- 2.11. There is an existing watercourse which runs along the western (and part northern) boundary of the Site, near to Llanrwst Road and the link through to Isgoed.
- 2.12. Vehicular access to the Site is currently achieved via the adjoining field to the immediate south of the Site. New access arrangements are proposed as part of the development, as documented in Section 4 of this Statement, from the B5106 Llanrwst Road. The Site currently lies within a 20mph

speed limit area on Llanrwst Road, with a 40mph zone commencing south of the proposed vehicular Site access point.

- 2.13. There are no public rights of way across the Site.
- 2.14. The majority of the Site lies in Flood Zone 1 as shown on the Natural Resources Wales *Flood Maps for Planning* and thus is deemed to be at little or no risk of fluvial or coastal/tidal flooding. There are some small areas of potential surface water flooding along the length of the existing watercourse at the western edge of the Site, as confirmed in the accompanying Flood Consequences Assessment.
- 2.15. The Site is not located within a Conservation Area, and there are no listed buildings on or immediately adjacent to the Site, the setting and significance of which might otherwise be affected by the proposed development. The nearest listed heritage asset to the Site is Brynglorian Farm Outbuildings located to the south-west of the Site, to the west of Llanrwst Road, within c. 50m-100m of the proposed Site access. The Site is physically and visually separated from other listed buildings within the community of Gyffin.
- 2.16. The Site lies c. 200m south of the Essential Setting of the UNESCO World Heritage Site of Conwy Castle. There is some existing intervisibility between the western section of Conwy Town Wall and the Site. Furthermore, the Site lies at the edge of the Creuddyn and Conwy Registered Historic Landscape.
- 2.17. The topography of the land is such that it slopes from south-east to north-west, falling from 82.19 to 22.41 as shown on the submitted Topographical Survey. The levels of the Site have been taken into full account to inform the proposed development.
- 2.18. There are a number of existing trees (and hedgerows) at the boundaries of the Site, as well as some within the Site. There are a number of existing trees which are protected under Tree Preservation Order A15 at the edges of the Site. The presence of these protected trees has been taken into full account to inform the proposed development.
- 2.19. There is an existing Tree Preservation Order on part of the Site, TPO Reference A15 (Land near Gyffin Hill, Conwy). These trees will be retained.
- 2.20. There are no utilities across the Site at present, but good points of connection to serve the proposed development are available.
- 2.21. Further details of the Site context and surroundings are provided in the accompanying Design and Access Statement, which we don't intend to repeat in this Statement.

Locational Sustainability

- 2.22. In order to appraise the locational sustainability of the Site, we have considered the location of the Site relative to the everyday needs of future residents and access to key services. Further details are provided in Section 5 of the accompanying Transport Assessment.

Access to Education

- 2.23. The nearest Primary School to the Site is Ysgol Porth-y-Felin located on Llanrwst Road; this lies c. 950m to the north of the Site, within a short and safe walking distance from the pedestrian link to the Site where it adjoins Isgoed. It lies c. 1.1km from the proposed vehicular Site entrance from Llanrwst Road.

- 2.24. Ysgol Llangelynnin lies further south of the Site, in the settlement of Henryd, within a c. 2.5km distance from the proposed Site access.
- 2.25. The nearest Secondary School to the Site is Ysgol Aberconwy located on Morfa Drive in Conwy. This lies c. 2.1km from the proposed Site entrance off Llanrwst Road.
- 2.26. Overall, the Site benefits from good access to primary and secondary education.

Access to Shops and Services

- 2.27. There is existing retail provision in Gyffin providing residents with access to their everyday needs. This comprises a Premier Store within a 0.3km walking distance of the Site via the proposed pedestrian and cycle link through to Isgoed.
- 2.28. Given the proximity of the Site to Conwy, future residents would also enjoy access to a range of local services including a selection of shops, public houses/restaurants, cafes, take-aways, butchers, bakery, pharmacy, and hair salons within a short distance of the Site. The same applies to a Place of Worship and the Community Centre in Gyffin for the hosting of and attendance at events.
- 2.29. Overall, the Site benefits from very good access to local facilities to serve the everyday needs of future residents. Section 5 of the accompanying Transport Assessment provides further details on the accessibility of local services from the Site.

Access to Footpaths

- 2.30. There is an existing gated access into the Site from Isgoed. It is proposed that this will serve as the publicly accessible pedestrian and cycle route into and out of the Site post-development, connecting to the existing footpath network on Isgoed and Llanrwst Road. This will facilitate and encourage safe pedestrian and cycle connectivity to and from the Site, demonstrating the capability for people to travel by sustainable modes of transport. This includes safely accessing the local bus services that operate on Llanrwst Road, as documented further below.

Access to Public Transport

- 2.31. The nearest unmarked bus stops to the Site are located on Llanrwst Road, to the north-west of the Site, and within a safe and short walking distance of c. 300m-350m via the proposed pedestrian connection to Isgoed. A further unmarked bus stop is provided on Byrn-Seiri Road, within 300m.
- 2.32. Details of the bus services provided via these stops are set out in Section 6 of the accompanying Transport Assessment. These include the No. 19, 19S and 27 services which provide access to destinations including Conwy, Colwyn Bay, Llandudno and Llandudno Junction. Each service also calls at Conwy Railway Station, which in turn provides access to other bus services. Details relating to the frequency of each bus service are provided in paragraph 6.2.2.1 of the accompanying Transport Assessment.
- 2.33. In terms of rail provision, there is an existing railway station in Conwy, within a c. 1.4km walking and cycling distance from the proposed Site access (as well as being accessible via bus services). The North Wales Coast Line services operating through Conwy provide daily access to the likes of Holyhead, Bangor, Llandudno Junction, Colwyn Bay, Flint, Holyhead, Prestatyn, Chester, Wrexham and Crewe.

2.34. Overall, the Site benefits from good accessibility to local bus services and with it access to other towns/settlements across North Wales in adjoining County areas.

Access to Healthcare

2.35. There are existing medical practices and surgeries within Gyffin, within a short and safe distance from the Site. A pharmacy is available in nearby Conwy.

Access to Leisure / Recreation

2.36. The nearest equipped area of play to the Site is located to the north off Mill Hill, within a short walking distance of the Site (c. 300m) via the proposed pedestrian connection to Isgoed.

2.37. This also provides access to outdoor playing pitches adjacent to the east of the play area.

2.38. Gyffin Community Centre lies within a c. 300m walking distance of the Site via Isgoed, located on Henryd Road.

2.39. Accordingly, the Site benefits from access to local facilities for community use which are capable of supporting the health and well-being of future residents, including young children.

Summary

2.40. Overall, the Site is considered to benefit from very good locational accessibility and connectivity to primary and secondary education, public transport (bus services), shops and services, healthcare and leisure/recreation facilities.

3 PLANNING HISTORY

3.1. Details of the Site's planning history, insofar as it is relevant to the proposed development now subject to this Application, is set out in *Table 1* below:

Table 1: Planning History

Application Reference	Description of Development	Decision Date
4/14/676	Residential Development (outline)	Refused 4 th September 1980
4/14/799	3-bedroom dormer bungalows or house with garage (outline)	Approved 15 th July 1982
PIAW 4/14/799	Dwelling for agricultural purposes	Approved 8 th March 1984
0/29607	Affordable Housing (outline)	Refused 11 th April 2005
0/46624	Residential development (7 no. dwellings), access and associated works (outline)	Withdrawn 3 rd October 2019
0/47578	Residential development (7 no. dwellings), access and associated works	Refused 5 th October 2020

3.2. As illustrated in *Table 1* above, the Site has previously been the subject of separate planning applications for residential use by third parties, none of which have been approved.

3.3. The Applicant has had careful and considered regard to the previous refusals on the Site in formulating the proposed development now submitted to the Council as part of this Application.

4 PROPOSED DEVELOPMENT

4.1. This Section of the Statement provides details of the proposed development for which detailed planning permission is now sought.

Use

4.2. This Application seeks detailed planning permission for the following:

“Erection of 95 no. dwellings and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new sub-station”

Amount

4.3. The proposed development will comprise the development of 95 no. dwellings (Use Class C3), all of which will be of an affordable tenure.

Housing Mix and Density

4.4. The proposed development will comprise the following housing mix:

- 30 no. 2-person, 1-bed **apartments** at 51 square metres;
- 12 no. 3-person, 2-bed **apartments** at 65 square metres;
- 2 no. 3-person, 2-bed **bungalows** at 59 square metres;
- 10 no. 4-person, 2-bed **houses** at 83 square metres;
- 12 no. 4-person, 2-bed **houses** at 83 square metres;
- 1 no. 5-person, 3-bed **house** at 93 square metres;
- 2 no. 5-person, 3-bed **houses** at 96 square metres;
- 21 no. 5-person, 3-bed **houses** at 92 square metres;
- 4 no. 6-person, 4-bed **houses** at 114 square metres; and
- 1 no. 8-person, 5-bed **house** at 131 square metres.

4.5. In total, 42 no. apartments are proposed, and 53 no. dwellings (including 2 no. bungalows).

4.6. The proposed net density across the Site will be 39.74 dwellings per hectare (based on a net developable area of 2.39 hectares).

4.7. The affordable homes are anticipated to be a split of Social Rented and Affordable Rented (Intermediate) tenures, to be confirmed in discussions with the Council’s Housing Strategy Team. At present, it is proposed that it will comprise a 70% Social Rent and 30% Affordable Rented tenure split across the Site as documented in the accompanying Affordable Housing Statement and Housing Mix Statement.

Scale and Massing

4.8. The majority of the proposed buildings on the Site will be a maximum of two-storeys in height, with the exceptions being the bungalows comprising a single storey.

4.9. The proposed mix of dwellings (as set out in paragraph 4.4 above) allows for a layout which does not give cause to issues of massing which could otherwise be out-of-keeping with the local surrounding character and context, whilst also responding to local housing needs identified within

the Council's Local Housing Market Assessment and the most recently available housing waiting list/register information set out later in this Statement.

Layout

- 4.10. The Proposed Site Plan is shown on *Figure 2*. This incorporates a mix of mid and end-terraced/mews properties and semi-detached properties, with a single detached property. The layout has sought to positively address the street frontage throughout the Site; at the same time, the properties are set back from the internal road to allow for off-road front and side parking. Furthermore, the size and type of dwellings are pepper-potted through the Site as opposed to being grouped together, providing for a much more balanced layout/development. Full details of the design development, evolution and rationale are provided in the accompanying Design and Access Statement.
- 4.11. The layout has been designed such that it complies with the Council's required separation distances and avoids any issues of overlooking and impact on the residential amenity of surrounding residential properties to the north and west of the Site (the privacy of which will be maintained through the retention of established landscaping around the Site wherever possible, alongside new planting).
- 4.12. Consideration has also been given to the Secured by Design principles to inform the proposed Site layout and boundary treatments. Accordingly, the proposed dwellings have been designed/orientated such that there is the opportunity for natural surveillance from properties. This includes surveillance of the public open space within the Site.
- 4.13. Details of the street lighting to be provided within the Site can be dealt with by way of a pre-occupation condition attached to any grant of planning permission.

Figure 2: Proposed Site Plan



4.14. The layout has sought to retain the existing trees and hedgerows within and around the Site as far as possible. In addition, new tree planting is proposed as illustrated on the submitted Landscape Plan.

Appearance and Materials

4.15. It is proposed that 11 no. house types will be delivered across the Site; further details, including floorplans, are provided on the submitted drawing package.

4.16. The palette of materials proposed by the Applicant provides an opportunity to place-make and create a strong character, identity and legibility through the proposed development. Further details are provided in the accompanying Design and Access Statement.

4.17. Confirmation of the full and final materials palette can be dealt with by way of a pre-commencement planning condition(s) attached to any planning permission.

Landscaping and Public Open Space

4.18. A Landscape Plan has been prepared and is submitted with the Application. This provides details of trees and hedgerows to be retained, new tree and hedgerow planting within and at the perimeter of the Site alongside retained natural features. This will include native tree and shrub planting, as well as ornamental planting, amenity planting, turfed lawned areas, alongside the species rich grassland. Details of hard landscaping area also provided, including permeable paving and tarmac.

4.19. The open space provision across the Site will comprise the following:

- 19,908 square metres of wildflower meadow amenity space;
- 499 square metres of equipped play, comprising 7 no. pieces of play equipment (indicative at this stage); and
- 5,245 square meters of general green amenity space throughout the Site.

4.20. Each of the proposed dwellings will benefit from private outdoor garden space within their curtilage, whilst the apartments will share an outdoor communal space.

4.21. The proposed boundary treatments (at the perimeter of the Site and between residential curtilages) will likely include 1.2m post and wire fencing, 1.5m close boarded timber fencing, and 1.8m close boarded timber fencing. All fences will be required to comprise hedgehog compliant access holes and advisory signage.

Accessibility

4.22. A new vehicular (and pedestrian/cycle) access into the Site is proposed from Llanrwst Road towards the south-western corner of the Site. This is shown on Drawing Ref. 1816/06/A contained within the accompanying Transport Assessment.

4.23. The works proposed as part of this Application will include a new priority-controlled junction designed to typical residential standards and will provide a 5.5m wide carriageway, 10m corner radii, 2m wide continuous footway on the southern side of the road and a 3m active travel route on the north side of the road.

- 4.24. A pedestrian and cycle connection is proposed to link to Isgoed to the north of the Site, facilitating and encouraging sustainable modes of travel, access to the existing footway network, and access to public transport services. The internal footways will provide for the safe movement of pedestrians and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services as documented in Section 2 of this Statement.
- 4.25. Dropped kerb crossings with tactile paving will be provided within the Site. These will assist footpath users and cyclists of all abilities, ensuring that the proposed development is accessible to all.
- 4.26. The visibility splays at the Site access will be 2.4m x 43m looking right, and 2.4m x 42m looking left. These have been informed by a traffic survey.
- 4.27. The internal road arrangements have been designed to ensure the movement of service and refuse vehicles without allowing their requirements to dominate. Swept path analysis has been undertaken to inform the proposed layout, details of which can be found on Drawing Ref.' 1816/SP/01/A and of the accompanying Transport Assessment.
- 4.28. In respect of vehicle parking, the Council's parking standards, applied to the proposed housing mix, would necessitate the delivery of 189 no. car parking spaces for residents and a further 19 no. visitor spaces (a total of 208 no. spaces).
- 4.29. The proposed development comprises 154 no. resident car parking spaces and 14 no. visitor parking spaces (a total of 168 no. spaces). The shortfall against the Council's parking standard requirements (of 189 spaces) is the result of only providing 1 no. parking space per 2-bedroom apartment, and only 2 no. spaces for some of the proposed 3-bedroom houses. However, an over-provision of visitor spaces has been made.
- 4.30. Based on the car ownership data set out in paragraphs 4.6.5 to 4.6.10 of the accompanying Transport Assessment, the total amount of car parking provision is considered to be sufficient and should not result in any parking problems or issues such as overspill onto Llanrwst Road or nearby residential roads.
- 4.31. Details of the external street lighting shall be agreed with the County Highways Authority.
- 4.32. Secure cycle parking will be provided within buildings and/or lockable garden sheds.

Waste and Recycling

- 4.33. Each of the proposed houses will have its own private bin storage area to aid waste collection and recycling within its curtilage. The apartments will benefit from a communal external bin store area.
- 4.34. As outlined above, vehicle tracking has been undertaken as part of the accompanying Transport Statement to ensure that the internal road system can accommodate the safe manoeuvring of refuse vehicles.

Drainage

- 4.35. The proposed development will incorporate the following drainage measures, as documented within the accompanying Flood Consequences Assessment and Drainage Strategy, and shown on Drawing Ref. 5388-CAU-XX-XX-DR-C-1601 Rev. P04:

- **Surface Water** – the proposed surface water drainage strategy incorporates a number of sustainable drainage measures. These comprise rainwater gardens at each property (where possible), swales with perforated pipe beneath, along the eastern boundary, cellular attenuation at each property (and sections of highway), with overflow detention basins (inclusive of a deep geocellular crate) located within the northern part of the Site to accommodate attenuated discharge at greenfield run-off rates. The management of surface water drainage will be in compliance with the Welsh Government SuDS standards, and will be separately submitted to the SAB for approval; and
- **Foul Water** – at present no existing foul water drainage is located within the site boundary. The closest existing public foul water sewer is located 30m outside of the site boundary to the north in Isgoed. A pre-development enquiry is to be applied for with Dyr Cymru Welsh Water to confirm if outfall into this existing public network is achievable. Proposed foul drainage is to be collected from each plot and discharged into the proposed foul water drainage network.

Sustainability Measures

4.36. It is noted that Conwy County Borough Council declared a climate change emergency in May 2019. Accordingly, and in response, it is anticipated that the proposed development will incorporate some of the following sustainability measures:

- **Dwelling Design** – as an overriding principle, the design of the proposed development has sought to implement the energy hierarchy by reducing energy demands and then increasing energy efficiency in the dwellings. This will ensure that the properties are as energy efficient as possible in order not to adversely contribute towards future climate change;
- **Soft Landscaping** – the proposed development will incorporate new soft landscaping alongside retained landscape features as part of a green infrastructure network across the Site. Private gardens will also be provided for the health and well-being of future residents. The proposal has the ability to achieve a net biodiversity benefit;
- **Cycle Storage** – it is proposed that a lockable cycle store will be provided to all plots;
- **Water** – in order for the proposed dwelling to utilise as little water as possible, water efficiency within the properties will be maintained through the installation of dual flush toilets and the use of flow restrictors on taps;
- **Drainage** - a sustainable urban drainage system will be implemented across the Site, as outlined earlier in this Section;
- **Waste Management** – a post-construction domestic waste management and recycling scheme will be implemented. All kitchens will have internal recycling bins to encourage residents to recycle and minimise their own waste;
- **Energy rating** - All dwellings will be developed to achieving EPC A (SAP92 or greater) as a fabric first approach with ASHP with Photovoltaic panels;
- **Overheating analysis** – The Applicant will undertake an assessment of overheating risk based on the CIBSE TM59 methodology for Apartments/Flats and Houses which do not have two or more parallel aspects to facilitate cross-ventilation;

- **Secured by Design** - The Site has been developed to achieve Gold standard; and
- **Modern Methods of Construction / Embodied Carbon** - The scheme has been developed to use the Nudura Insulated Concrete Forms as the Applicant believe this provides improved speed of construction, reduces waste and improves efficiency while also providing high build quality and performance. It's a highly durable construction form that the Applicant has utilised for several years.

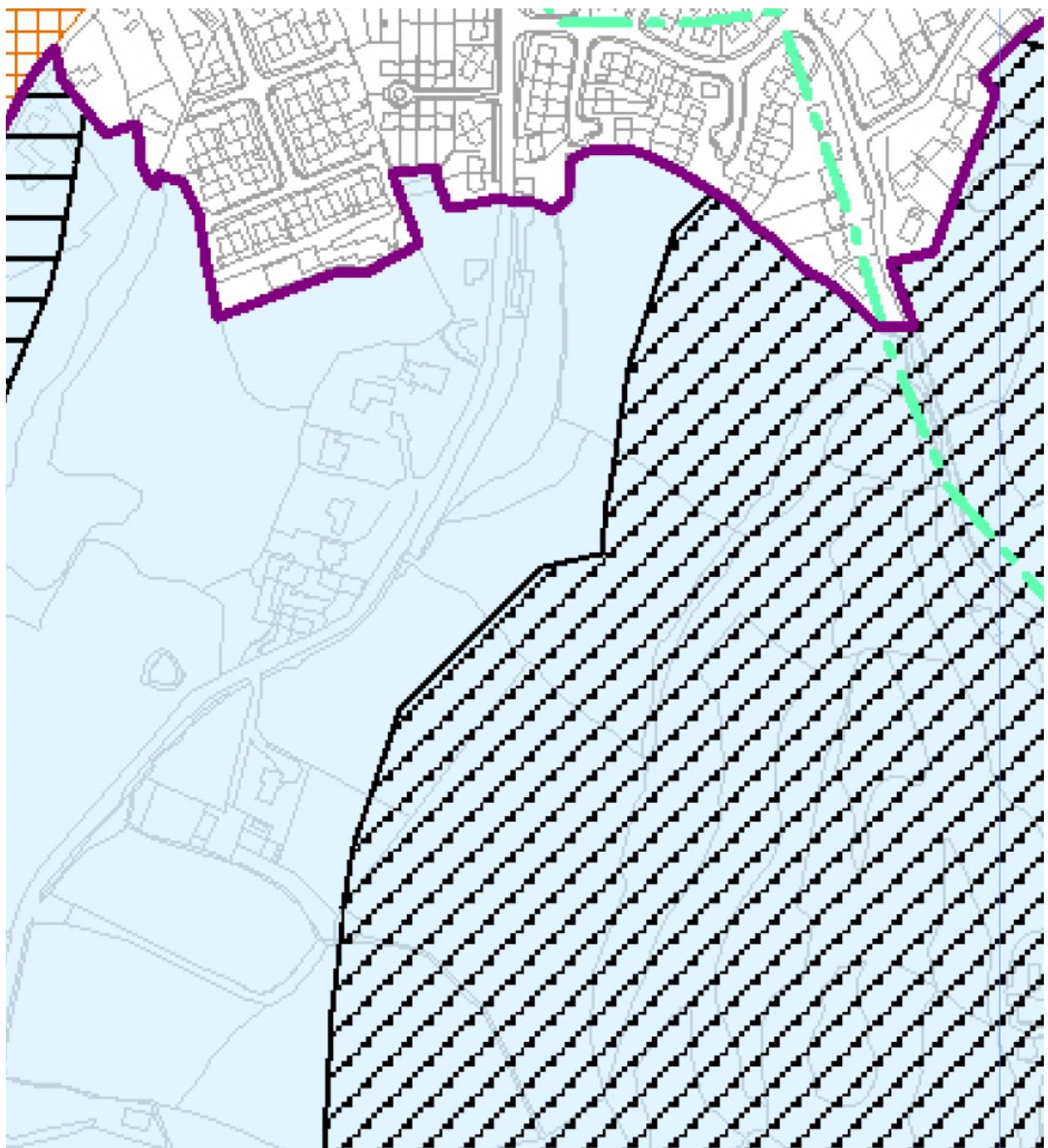
5 PLANNING POLICY CONTEXT

- 5.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 12 ("PPW12") published in February 2024.
- 5.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

Local Development Plan

- 5.4. The development plan for the purposes of this Application comprises the following:
 - **Conwy Local Development Plan adopted in October 2013; and**
 - **Conwy Local Development Plan Policies Map.**
- 5.5. The adopted LDP is now time-expired, covering the period 2007 to 2022, and thus the weight to be afforded to the policies will depend on the degree consistency of the LDP with PPW12.
- 5.6. On the Local Development Plan Proposals Map, the Site lies outside but immediately adjacent to the development boundary/limits of Conwy (northern boundary of the Site). It is located within the open countryside and is not allocated for any specific land-use within the LDP.
- 5.7. The Site is shown as lying within the Conwy Valley *Special Landscape Area*, and partly within an area of *Safeguarded Sandstone*.
- 5.8. Conwy is identified as forming part of the Urban Area with the settlement hierarchy, as part of the *Conwy, Llandudno and Llandudno Junction Urban Development Strategy Area*.

Figure 3: Local Development Plan Proposals Map Extract

*Local Development Plan*

5.9. In addition to those policies cited above, the following Local Development Plan policies are considered to be pertinent in the determination of this Application, and are considered further in Section 6 of this Statement:

Table 2: Relevant Local Development Plan Policies

Policy Reference	Policy Title
DP/1	Sustainable Development Principles
DP/2	Overarching Strategic Approach
DP/3	Promoting Design Quality and Reducing Crime
DP/4	Development Criteria
DP/5	Infrastructure and New Developments
DP/6	National Planning Policy and Guidance
HOU/1	Meeting the Housing Need
HOU/2	Affordable Housing for Local Need
HOU/4	Housing Density
HOU/5	Housing Mix
HOU/6	Exception Sites for Affordable Housing for Local Need
CFS/1	Community Facilities and Services
CFS/11	Development and Open Space
NTE/1	The Natural Environment
NTE/3	Biodiversity
NTE/4	The Landscape and Protecting Special Landscape Area
NTE/8	Sustainable Drainage Systems
NTE/9	Foul Drainage
NTE/10	Water Conservation
CTH/1	Cultural Heritage
CTH/2	Development Affecting Heritage Assets
CTH/5	The Welsh Language
STR/1	Sustainable Transport, Development and Accessibility
STR/2	Parking Standards
STR/3	Mitigating Travel Impact
STR/4	Non-Motorised Travel
MWS/1	Minerals and Waste
MWS/2	Minerals
MWS/3	Safeguarding Hard Rock and Sand and Gravel Resources

5.10. The Local Development Plan identifies a number of key issues impacting on development across the County. This has informed the identification of a number of Priority Issues, and which include the following which are considered pertinent to this Application:

- **Overcoming High Levels of Constrained Land** – there is an acceptance that there is a shortage of previously developed land to meet the needs of the County. Furthermore, large swathes of land are also subject to high levels of flood risk. Accordingly, there is recognition that land needs to be used efficiently by locating development in sustainable locations where practicable;
- **Accommodating Sustained Housing Growth and promoting a more balanced age structure** – there is recognition that more houses are required as a result of changing

household sizes and net in-migration. There is a need to deliver 6,520 new houses over the Plan period up to 2022;

- **Prioritising Affordable Housing Need** – the Local Development Plan recognises that Conwy has an inadequate supply of affordable housing for local needs. There is a requirement to ensure that provision of up to approximately 1,875 new affordable homes are provided to contribute to the levels of demand and to promote a more balanced age structure;
- **Encouraging Sustainable Transport** – there is recognition of the needs for improved sustainable transport use and transport infrastructure in Conwy, facilitating increased cycling and walking to reduce car dependency;
- **Promoting High Quality Design** – high-quality sustainable design is recognised as having an important role to play in sustaining and enhancing the character of Conwy, as well as providing more innovative design to encourage the younger population to remain and return to the area;
- **Protecting Conwy's Cultural Heritage** – new development should take into account the historic built environment and ensure that design and build quality will help to protect, maintain and, where appropriate, improve on this quality in Conwy; and
- **Protecting the Welsh Language and Culture** – there is increasing pressure on the Welsh language, and there is a need for this to be protected.

- 5.11. Guidance from Welsh Government published in a letter dated 24th September 2020 confirms that in the absence of an up-to-date LDP, Plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP.
- 5.12. This is the case in Conwy. Accordingly, the adopted LDP remains the development plan for the purposes of determining this Application. The replacement LDP and its emerging evidence base carries limited weight.
- 5.13. This is accepted by Conwy County Borough Council within its formal Pre-Application response to this proposal dated 26th October 2023.

Emerging Local Development Plan

- 5.14. At the time of writing, Conwy County Borough Council has undertaken the following stages in the preparation of its Replacement LDP:
 - LDP Delivery Agreement Published in May 2018; and
 - Consultation on Preferred Strategy held between 29th July 2019 and 20th September 2019. This set out various growth options; it did not identify any specific site allocations.
- 5.15. Consultation on the Deposit draft of the Replacement LDP will take place between 12th January 2026 and 8th March 2026.
- 5.16. The *Site Deliverability Assessment* published by the Council in December 2025 has assessed the Site as Site Ref. 192, and concluded as follows:

"This site is more sensitive in terms of heritage and landscape impact than some of the other sites proposed for allocation and has been ranked lower due to deliverability concerns. The sustainable location of the site close to local amenities, and the proposed high level of affordable housing weigh in favour of development. It could form a logical extension to existing development, subject to appropriate consideration of heritage and landscape impact. Overall, it is considered a deliverable site, although not required as part of the RLDP housing supply."

5.17. To this end, whilst the Replacement LDP and its emerging evidence base carries limited weight in the determination of this Application at the time of writing, it nevertheless demonstrates that the Site is capable of coming forward for development as an affordable housing exception site such as that now proposed. Previous concerns over deliverability have been resolved, as documented in Section 6 of this Statement.

Planning Policy Wales 12

5.18. PPW12 is a material consideration in planning decisions. PPW12 sets out the Welsh Government's approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental and cultural well-being* of Wales, and proposals should seek to promote sustainable development.

5.19. Paragraph 1.18 re-iterates the presumption in favour of sustainable development.

5.20. Within PPW12, paragraph 1.22 requires development proposals to be determined in accordance with the adopted development plan unless material considerations indicate otherwise.

5.21. Placemaking features strongly within PPW12, identified as a holistic approach to the planning and design of development and spaces. This encourages high-quality development, with major developments creating new places.

5.22. Chapter 3 of PPW12 identifies the need to encourage and support the use of the Welsh language. Development proposals should consider the likely impact on the Welsh language and is a material planning consideration. It also seeks to protect the best and most versatile agricultural land unless there is an overriding need for its development.

5.23. Paragraph 3.60 of PPW12 recognises that "*infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing.*"

5.24. Chapters 3 and 4 of PPW12 look at locational sustainability. New development should be accessible by walking and cycling, and well-served by public transport, as alternatives to the private car. New development should be located such that it minimises the need to travel and reduces dependency on the private car.

5.25. Chapter 4 of PPW12 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council's Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing delivery in each Authority area. Accurate information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review.

Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.

- 5.26. Paragraph 4.2.25 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 5.27. Paragraph 4.2.26 confirms that affordable housing includes social rented housing owned by local authorities and Registered Social Landlords and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents.
- 5.28. Paragraph 4.2.27 sets out the importance for local planning authorities to have an appreciation of the demand for different types of affordable housing in relation to supply.
- 5.29. Paragraph 4.2.29 sets out the requirement for all affordable housing to meet the Welsh Government's development quality standards.
- 5.30. Paragraph 4.2.33 states that planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable.
- 5.31. Paragraph 4.2.34 requires that affordable housing provided on exception sites should meet the needs of local people in perpetuity.
- 5.32. Chapter 6 requires development proposals to take account of the wildlife or landscape value of an area (including safeguarding protected species), and states that it is important to balance conservation objectives with the wider economic needs of local businesses and communities. Landscape value is identified as an intrinsic part of PPW12, and consideration should be given at the outset to any landscape value such that the wellbeing needs can be achieved. The provision of green infrastructure is encouraged, and the quality of the built environment should be enhanced by integrating green infrastructure into new development demonstrated through a Green Infrastructure Statement as required by paragraph 6.2.12. Paragraph 6.2.13 recognises that green infrastructure can have wider cumulative benefits, particularly in relation to biodiversity and the resilience of ecosystems as well as in securing the other desired environmental qualities of places.
- 5.33. Chapter 6 also covers matters relating to flood-risk and drainage. PPW12 is clear that new development should reduce and not increase the risk of flooding; to this end, Local Planning Authorities are encouraged to work closely with Natural Resources Wales, drainage bodies, sewerage undertakers and relevant authorities in the determination of planning applications. This process should ensure that surface water run-off is controlled as near to the source as possible through the use of sustainable urban drainage systems ("SUDS"), ensuring that development does not increase flooding elsewhere by the loss of flood storage/flood flow route, or increase the problem of surface water run-off. Paragraph 6.6.17 requires that development of one or more dwellings also require approval from the SuDS Approval Body ("SAB") before construction can commence. This is designed to ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

Future Wales – The National Plan 2040

- 5.34. The Welsh Government published the National Plan in February 2021. It serves as the national development framework for Wales, a spatial plan setting the direction for development nationally

up to 2040. It provides the basis upon which further guidance, including Planning Policy Wales and Local Development Plans, should be prepared.

- 5.35. In respect of housing delivery, the National Plan requires a mix of housing types and tenures to create social inclusion and to cater for mixed lifestyles and working arrangements.
- 5.36. Policy 7 focuses on the delivery of affordable homes. Providing housing at levels which meets needs is stated to be a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.
- 5.37. In the North, Local Development Plans should seek to support growth and appropriate development in rural towns and villages. This includes market and affordable housing.

Technical Advice Notes (TAN)

- 5.38. Alongside PPW12, a number of Technical Advice Notes ("TAN") have been prepared by the Welsh Government. Those of relevance to the determination of this Application comprise the following:
 - TAN2 – Planning and Affordable Housing
 - TAN5 – Nature Conservation and Planning
 - TAN10 – Tree Preservation Orders
 - TAN11 - Noise
 - TAN12 – Design
 - TAN15 – Development and Flood Risk
 - TAN18 – Transport
 - TAN20 – Planning and the Welsh Language
 - TAN24 – The Historic Environment
- 5.39. In respect of TAN2, this is a material planning consideration that should be read alongside PPW12 as documented above, in the determination of planning applications.
- 5.40. The purpose of TAN2 is to provide advice to local planning authorities on how to determine affordability. This includes the need for a collaborative approach working alongside stakeholders.
- 5.41. Paragraph 3.2 of TAN2 sets out the need for local planning authorities to include an affordable housing target in their development plan which is based on the housing need identified in the local housing market assessment. It should set out how this target will be achieved, and monitor development on an annual basis.
- 5.42. Paragraph 5.1 of TAN2 defines affordable housing as including social rented housing and intermediate housing.
- 5.43. TAN2 recognises that affordability is one of the key factors influencing housing demand and need. Information on affordability will therefore be an important consideration in developing policies to deliver/meet affordable housing needs.

Other Material Planning Considerations / Evidence Base Documents

- 5.44. Conwy County Borough Council has published a number of other material planning considerations and evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

Joint Housing Land Availability Study (“JHLAS”)

- 5.45. The Council’s latest stated housing land supply position is set out in the JHLAS published in October 2019, with the supply position as of 1st April 2019.
- 5.46. The housing supply position in the most recent JHLAS is accepted to be less than five years, standing at just a 2.5-year supply. This is significantly below the minimum 5-year supply previously required by PPW10 and Technical Advice Note 1 (TAN1).
- 5.47. TAN1 has now been revoked by the Welsh Government and with it the requirement for Local Planning Authorities to prepare a Joint Housing Land Availability Study. Nevertheless, the Council’s latest Housing Land Monitoring Statement clearly illustrates the significant housing delivery pressures across the County, and the fact that housing needs, including affordable housing as documented below, are not being met. This needs to be addressed with immediate, positive action.

Housing Monitoring

- 5.48. Under the new housing monitoring process as set out in the Development Plans Manual (DPM), housing delivery is assessed against the housing trajectory contained in an adopted Local Development Plan. Housing completions in Conwy were 134 dwellings (30%) below the LDP annual requirement in 2018-19, and 2,078 (40%) below the cumulative LDP delivery requirement for 2007-2019. This compares to a 2.5 year supply in the latest (2019) JHLAS Report.
- 5.49. Both methods demonstrate a significant shortfall in housing delivery against the Conwy LDP target, therefore some weight will need to be attributed to the housing delivery shortfall in the determination of this Application.

Local Housing Market Assessment (LHMA)

- 5.50. The Council’s most recent LHMA covers the period 2022-2037.
- 5.51. The LHMA sets out a range of additional housing needs estimates within Section 4. We have had regard to the Principle Projection as the mid-range, as opposed to the Lower or Higher Projections.
- 5.52. For the first 5 years of the LHMA, from 2022 to 2027, Table 92 identifies an existing unmet affordable need of 627 dwellings, and a total affordable housing need of 694 dwellings.
- 5.53. The estimated annual additional affordable housing need in the Creuddyn Housing Market Area (by tenure), in which Conwy is located, comprises 140 dwellings for Social Rent based on Table 93, and 224 affordable dwellings in total in the Creuddyn Housing Market Area (HMA).
- 5.54. Table 95 of the LHMA illustrates that the estimated annual additional social rent need for the remaining 10 years of the LHMA period is highest in the Central HMA and the Creuddyn HMA, with the latter at 55 affordable dwellings per year.
- 5.55. Table 96 confirms that across the full 15-year LHMA period, there is a net need for 1,325 affordable dwellings in the Creuddyn HMA, and 3,402 dwellings in total across the County.
- 5.56. Accordingly, there is a significant affordable housing need to be met across Conwy County Borough based on the Principal Projection presented within the LHMA.

Local Planning Guidance Notes

5.57. Conwy County Borough Council has published the following Supplementary Planning Guidance Notes ("SPGN") which are considered relevant in the determination of this Application:

- Supplementary Planning Guidance LDP2 – Parking Standards (February 2014)
- Supplementary Planning Guidance LDP4 – Planning Obligations (July 2014)
- Supplementary Planning Guidance LDP5 – Biodiversity (November 2014)
- Supplementary Planning Guidance LDP6 – Welsh Language (November 2014)
- Supplementary Planning Guidance LDP9 – Design (July 2015)
- Supplementary Planning Guidance LDP13 – Affordable Housing (August 2017)
- Supplementary Planning Guidance LDP34 – Waste Storage and Collection in New Developments (December 2015)
- Supplementary Planning Guidance LDP40 – Trees and Development (February 2017)

5.58. Compliance of the proposed development with these SPGNs is considered in Section 6 of this Statement.

6 TECHNICAL AND POLICY ASSESSMENT

6.1. This Section of the Statement assesses the proposed development against the relevant policies of the development plan, and other material considerations, as documented in Section 5.

Principle of Development

Local Development Plan Status

6.2. As documented in Section 5 of this Statement, the proposed development should be determined against the policies of the development plan unless material considerations indicate otherwise. In the context of this Application, the development plan comprises the Conwy LDP.

6.3. As set out in Section 5 of this Statement, guidance from Welsh Government published in a letter dated 24th September 2020 confirms that in the absence of an up-to-date LDP, Plans adopted prior to 4th January 2016 will remain the LDP for determining planning applications until replaced by a new LDP. This is the case in Conwy.

6.4. Accordingly, the adopted LDP remains the development plan for the purposes of determining this Application despite it being time-expired. However, the weight to be afforded to each policy needs to be considered in respect of its consistency with PPW12.

6.5. The Replacement LDP and its emerging evidence base carries limited weight for the reasons set out in Section 5 of this Statement.

The Role of Conwy / Gyffin

6.6. Conwy is identified as forming part of the Urban Area with the settlement hierarchy, as part of the *Conwy, Llandudno and Llandudno Junction Urban Development Strategy Area*. Gyffin forms part of the Conwy Urban Area, based on the adopted LDP Policies Map.

6.7. In light of the above, Conwy is one of the most sustainable locations to support new housing delivery within the County.

Land-Use Designation

6.8. On the LDP Proposals Map, the Site lies outside but immediately adjacent to the development boundary of Conwy and is not allocated for any specific land-use. It is within the open countryside.

6.9. Policy HOU/6 of the adopted LDP allows for the development of *Exception Sites for Affordable Housing for Local Need*.

6.10. The Policy sets out 7 no. criteria against which proposals for *Exception Sites* will be assessed. These are considered in turn below:

a) The general local need for affordable dwellings must be proven

6.11. As confirmed in Section 5 of this Statement, there has been a significant under-supply in overall housing delivery across Conwy County Borough since 2007, falling considerably below the housing requirement set out in Policy HOU/1 of the adopted LDP (6,520 homes with a contingency of up to 7,170 dwellings).

6.12. The pre-application response received from Conwy County Borough Council dated 26th October 2023 confirmed the following:

“Under the new housing monitoring process as set out in the Development Plans Manual (DPM), housing delivery is assessed against the housing trajectory contained in an adopted Local Development Plan. Housing completions in Conwy were 134 dwellings (30%) below the LDP annual requirement in 2018-19, and 2,078 (40%) below the cumulative LDP delivery requirement for 2007-2019. This compares to a 2.5 year supply in the latest (2019) JHLAS report. Both methods demonstrate a significant shortfall in housing delivery against the Conwy LDP target, therefore some weight will need to be attributed to the housing delivery shortfall.”

6.13. The currently adopted annual housing requirement remains in place until such time that the Replacement LDP has advanced through Examination in Public, which remains some time off as confirmed in Section 5 of this Statement.

6.14. In order to understand the delivery of affordable housing during the LDP Plan period 2007-2022, we have had reference to the *Stats Wales* completions data. This is presented in *Table 3* below:

Table 3: Affordable Housing Completions in Conwy for period 2007/08 to 2021/22

Year	Annual Affordable Housing Completions
2007/08	26
2008/09	49
2009/10	60
2010/11	76
2011/12	32
2012/13	45
2013/14	158
2014/15	78
2015/16	85
2016/17	104
2017/18	71
2018/19	40
2019/20	79
2020/21	107
2021/22	116
Total	1,126
Average per Year	75.0

Source: *Stats Wales Affordable Housing by Location and Year*

6.15. Since the end of the LDP Period in 2022, there were 89 no. affordable completions in 2022-23, and 74 no. affordable completions in 2023-24 (based on data obtained from *Stats Wales Affordable Housing by Location and Year*).

6.16. As evidenced in Table 2 above, there has been a **persistent shortfall** in affordable housing delivery across the County of Conwy, including against the previous LHMA 2017-2022 need of 231 social and intermediate affordable homes *per year*.

6.17. The overall delivery of 1,126 affordable homes during the LDP period also represents a significant **shortfall of 749 dwellings** against the households in need figure of 1,875 identified within the adopted LDP, to be delivered during the Plan period 2007 to 2022.

6.18. This figure also falls below the supply figure of 1,542 affordable homes that were expected to be capable of delivery during the LDP period, as documented in *Table 6: HOU2a* of the LDP.

6.19. The shortfall in affordable housing delivery is a consequence of the overall shortfall in new housing delivery during 2007-2022 (market and affordable) against the LDP requirement, as documented earlier in paragraphs 6.11 and 6.12.

6.20. It is evident that there is a significant need for new market and affordable housing to come forward on sustainable greenfield sites to meet the outstanding housing needs of the County, which has now reached unsustainable and harmful levels.

Affordable Housing Needs

6.21. As per the information contained in Section 5 of this Statement and above, there is evidently a significant housing delivery shortfall across Conwy County Borough which needs to be urgently addressed through positive decision-taking. As a natural extension at the southern edge of Conwy and the Gyffin community area, the proposed development represents a logical development opportunity to realise new affordable housing delivery.

6.22. In order to understand the housing needs in the settlement of Conwy and the Creuddyn Housing Market Area in which it is located, reference has been had to the Council's latest LHMA 2023, as documented in Section 5 of this Statement, and the latest Social Housing (SARTH) and Affordable Housing (Tai Teg) Registers, details of which have been provided by the Council's Housing Strategy Team. These are extracted below for ease of reference:

Table 4: SARTH Housing Register – Applications for Conwy Area as of August 2025

Property Type and Bedroom Numbers	No. of Applicants for Conwy
Bungalow	
2-bedroom	112
Flat	
1-bedroom	264
2-bedroom	110
House	
2-bedroom	107
3-bedroom	76
3-bedroom (adapted)	5
4-bedroom	40

5-bedroom	8
Total	722

Source: Conwy SARTH Housing Register as of August 2025

Table 5: Affordable Housing (Tai Teg) Register – Applications for Gyffin and Conwy Town Area as of August 2025 (Affordable Rent)

Property Type and Bedroom Numbers	No. of Applicants in Conwy Town	No. of Applicants in Gyffin
Flat		
1-bedroom	6	0
2-bedroom	13	1
3-bedroom	1	0
4-bedroom	1	0
House		
1-bedroom	1	1
2-bedroom	65	12
3-bedroom	43	9
Total	130	23

Source: Tai Teg Housing Register as of August 2025 (Affordable Rent)

- 6.23. The SARTH Housing Register for the Conwy Area shows a high need for 1 and 2 bedroom properties in the form of bungalows, flats and houses, with a further need for 3-bedroom houses.
- 6.24. The Tai Teg Housing Register for the Conwy Town and Gyffin areas shows a high need for 2 and 3-bedroom houses, and a smaller demand for 2-bedroom flats.
- 6.25. The estimated annual additional affordable housing need in the Creuddyn Housing Market Area (by tenure), in which Conwy is located, comprises 140 dwellings for Social Rent based on Table 93, and 224 affordable dwellings in total in the Creuddyn Housing Market Area (HMA).
- 6.26. Table 95 of the LHMA illustrates that the estimated annual additional social rent need for the remaining 10 years of the LHMA period is highest in the Central HMA and the Creuddyn HMA, with the latter at 55 affordable dwellings per year.
- 6.27. Taking account of the above, the scale of the proposed development, at 95 no. dwellings, would in no way prejudice the Council's emerging Replacement LDP and its development strategy. It would not be premature. To the contrary, it would deliver a much-needed housing scheme comprising only affordable homes, responding to both a local and wider County-wide affordable housing need, which it is considered should attract significant positive weight in the overall planning balance consistent with the guidance contained in PPW12.

Private Rental Market

6.28. Details of private rents across Conwy have been obtained using the Stats Wales PRS Rents interactive table. These cover the years 2013 and 2019. Accordingly, we have assessed how private rents have changed in Conwy during this period (as the latest available published data).

Table 6: Median Private Rents in Conwy, 2013/14 and 2019/20

Bedroom Numbers	Median Rent in 2013/14	Median Rent in 2019/20	% Change
Conwy			
1-bedroom	£390	£400	+2.5
2-bedroom	£500	£550	+10
3-bedroom	£595	£625	+5.0
4+ bedroom	£750	£800	+6.6
Wales			
1-bedroom	£400	£450	+12.5
2-bedroom	£491.73	£525	+6.7
3-bedroom	£550	£575	+4.5
4+ bedroom	£730	£795	+9

Source: Stats Wales – *Private Sector Rents Interactive Table*

6.29. The data set out in Table 6 above shows that private rents have increased for every property size in Conwy between 2013/14 and 2019/20. Whilst this might not be unexpected, the rate of rental growth for smaller 2-bedroom properties are well in excess of the national average respectively (and 3-bedroom properties to a lesser degree).

6.30. The same data source has also been used to assess the lower quartile rents in Conwy over the same period. These rents are typically for people on lower incomes, including households that may be reliant on housing allowances to help cover some of their accommodation costs.

Table 7: Lower Quartile Private Rents in Conwy, 2013/14 and 2019/20

Bedroom Numbers	Lower Quartile Rent in 2013/14	Lower Quartile Rent in 2019/20	% Change
Conwy			
1-bedroom	£346.67	£347.50	+0.23
2-bedroom	£450	£495	+10
3-bedroom	£525	£575	+9.5
4+ bedroom	£650	£696.25	+7.11
Wales			
1-bedroom	£350	£375	+7
2-bedroom	£425	£450	+5.8
3-bedroom	£475	£495	+4
4+ bedroom	£625	£650	+4

Source: Stats Wales – *Private Sector Rents Interactive Table*

6.31. Table 7 illustrates that there have again been increases across the board for all property sizes when it comes to lower quartile private rents. The growth of lower quartile private rents in Conwy has exceeded the national average for 2, 3 and 4+ bedroom properties, significantly increasing the pressure on the ability for the residents of Conwy to access an affordable home within the County Borough. This is reflected through the number of applicants on the SARTH and Tai Teg Housing Registers seeking a 1, 2 and 3 bedroom property, as well as the overall affordable housing needs identified in the Council's latest LHMA.

House Prices

6.32. Statistical information is available at a more localised level to understand the median house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 2, 9 and 37.

6.33. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000038 'Conwy 012 in which the Site is located, the following median house prices have been identified covering a 10-year period;

- **March 2013** – median house price of £171,000
- **March 2023** – median house price of £261,000

6.34. This shows an increase of £90,000 to the median house price over a 10-year period at a local level, equating to a 52.6% increase.

6.35. At a Ward Level in Conwy (Code Area W05000119), the median house price was £140,000 in March 2013, and £250,000 in March 2023, an increase of 78.5% over a 10-year period.

6.36. In Conwy as a County, the median house price was £108,500 in March 2013, and £140,000 in March 2023, an increase of 29% over a 10-year period.

6.37. Accordingly, the median house price increase in the MSOA has exceeded the County level increase between March 2013 and March 2023, and shares parallels with the median house price growth seen within the Ward of Conwy.

6.38. The LHMA for the period 2022-2027 has identified the median household income in the Creuddyn Housing Market Area to be £33,150 (Table 9 of LHMA). Given that mortgage lenders will typically lend a household three to four times their household income, this would mean a median house price ratio of 7.8 in the MSOA area.

6.39. As with the median house prices, statistical information is available at a more localised level to understand the lower quartile house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 4, 15 and 39.

6.40. Based on the MSOA data for Code Area W02000038 'Conwy 012 in which the Site is located, the following lower quartile house price have been identified over a 9+year period (based on latest available data):

- **March 2013** – lower quartile house price of £122,000
- **December 2022** – lower quartile house price of £215,000

6.41. This shows an increase of £93,000 to the lower quartile house price over a 9+ year period at a local level, equating to a 76.2% increase.

6.42. At a Ward Level in Conwy (Code Area W05000119), the lower quartile house price was £118,000 in March 2013, and £205,000 in December 2022, an increase of 73.7% over a 9+ year period.

6.43. In Conwy as a County, the lower quartile house price was £109,250 in March 2013, and £150,000 in December 2022, an increase of 37.2% over a 9+ year period.

6.44. Accordingly, the lower quartile house price increase in the MSOA area has increased twice as much as the County average, and slightly more than the increase witnessed within the Ward of Conwy.

6.45. As outlined above, the LHMA for the period 2022-2037 has identified the median household income in the Creuddyn Housing Market Area to be £33,150 (no lower quartile household income figures are published). Given that mortgage lenders will typically lend a household three to four times their household income, this would mean a lower quartile house price ratio of 6.4 in the MSOA area. However, the reality is that this will be much higher, as the *lower quartile* household income figures will be less than the *median* household income figure of £33,150.

6.46. Taking account of the above, there are very significant issues of affordability in Conwy at each of the MSOA, Ward and County levels, with house prices significantly exceeding household incomes at both a median and lower quartile level.

6.47. The **urgent need** for new affordable housing in Conwy is well-established for the reasons set out above and is a material consideration to be afforded weight.

b) **There are no allocated sites coming forward within the development boundaries or confinements of the settlement which could meet this need**

6.48. There are no outstanding LDP housing allocations in the defined Conwy urban area capable of meeting the scale of development proposed.

6.49. Details of the LDP housing allocations in the Conwy area are provided below:

Table 8: LDP Housing Allocations in Conwy

Site Reference	Planning Permission Reference a	Status	Total No. of Dwellings	No. of Affordable Homes as Proportion of Total No. of Dwellings
Henryd Road, Gyffin (Contingency Site)	0/45853 and 0/49522	Completed	15	2

6.50. From Table 8 above, it can be seen that the extant contingency housing site in Conwy has delivered 2 no. affordable homes. These alone will not meet the significant affordable housing needs outlined earlier in this Section.

6.51. Based on the evidence of affordable housing need and past delivery rates at a County level (as documented earlier in this Section), there remains a residual housing need in Conwy which will not be met by the extant commitments alone. This is confirmed within the Council's pre-application response of 26th October 2023, which states that the contingency site in Gyffin (as outlined above) "**will not meet the shortfall for this area in full.**" This includes outstanding affordable housing needs.

6.52. Accordingly, additional sources of supply are now required otherwise there will, in effect, remain something of a 'policy vacuum' by which to deliver new housing outside of settlement boundaries until such time that a Replacement LDP is adopted in Conwy.

6.53. There is no other greenfield land outside of the settlement boundary of Conwy which is considered to be sequentially preferable to the Site now subject to this Application. Beyond the policies map designations, other considerations that have to be factored in when assessing alternative parcels of land outside of the settlement boundary include best and most versatile agricultural land, flood-risk, accessibility and sustainability, and topography.

c) **The proposal adjoins and forms a logical extension to the settlement boundary or adjoins the existing settlement**

6.54. The Site adjoins the settlement boundary of Conwy as shown at *Figure 3* of this Statement. It is a logical extension to the existing settlement pattern at its southern edge, and the organic growth of Conwy.

d) **Secure arrangements are provided to restrict the occupation of an affordable house/houses on first occupation and in perpetuity to those who can proven general need for an affordable house**

6.55. This obligation can be agreed with the Council's Housing Strategy Team and form part of a S106 Agreement to ensure that it is implemented and controlled.

e) **The number, size, type and tenure of the dwellings meet the justified local need as set out in the local housing needs survey**

6.56. The proposed development comprises a mix of 1, 2, 3, 4 and 5 bedroom homes, with the former the most predominant mix in response to the evidential housing needs documented in Sections 5 and 6 of this Statement.

f) **The AHLN units are of high quality, built of the Welsh Government's Development Quality Requirements**

6.57. All of the proposed dwellings will be designed to meet the Welsh Government's latest Development Quality Requirements and can be secured by way of planning condition attached to any grant of planning permission.

g) **The development proposal meets the requirements set out in the Development Principles and other related policies of the Plan**

6.58. This is evidenced to be the case, as documented throughout this Statement and the suite of supporting technical reports and plans/drawings.

Summary of the Case for Development

6.59. Policy HOU/6 would appear to have originally been written with the primary intention of delivering new affordable homes adjacent to *villages*, in circumstances where planning permission would not normally be granted and where there is a local and demonstrable need.

6.60. However, and as confirmed by the Council itself within its pre-application response dated 26th October 2023, the restrictions of Policy HOU/6 in not supporting an Exception Site adjacent to the larger urban areas (including Conwy) now appears to be out-of-date when considered in the context of the current housing delivery shortfall across the County of Conwy, the guidance contained in PPW12 (and the weight to be afforded to affordable housing delivery), and the wider support for delivering affordable housing for local needs through the planning system.

6.61. The key headlines to be drawn from the consideration of the proposed development in the context of Policy HOU/6 are as follows:

- There is a high demand and need for affordable housing in the Conwy Town (and Gyffin) Area based on the number of applicants seeking accommodation on the Social Housing and Affordable Housing (Tai Teg) Housing Registers, with a particularly high demand for 2 and 3 bedroom apartments and houses;
- Housing delivery across Conwy County has failed to meet the LDP requirement for the period 2007-2022, which in turn has adversely impacted on the rate of affordable housing delivery;
- Median and lower quartile rents in Conwy County have increased between 2013 and 2019 for smaller 2 and 3 bedroom homes, in excess of the respective national averages; and
- Median house price increases in the MSOA area where the Site is located have exceeded the County average and are consistent with the increases seen within the Ward of Conwy, all of which have increased significantly over the 10-year period from March 2013 to March 2023 creating issues of affordability. The same applies in respect of lower quartile house prices and a lack of affordability. The shortfall in overall housing delivery across Conwy County between 2007 and 2022, including affordable housing, has resulted in demand outstripping supply, in turn leading to higher house prices which are greatly beyond the median and lower quartile household incomes of many.

6.62. In view of the above, it is clear that the need to increase the supply of and access to affordable housing in Conwy is becoming ever more important, and there is a pressing need to address issues of affordability at a local and County level. The findings demonstrate evidence of genuine, proven local need for affordable housing where the Site is located, as well as across the County.

6.63. Given the scale of the evidenced need for affordable housing both in Conwy and at a County-wide level owing to a historic shortfall in housing delivery, the social benefits arising from the proposed development are considered to outweigh any conflict with the now time-expired policies of the Conwy LDP.

6.64. Paragraph 2.25 of PPW12 confirms that a community's need for affordable housing is a *material planning consideration* in the determination of planning applications.

6.65. National policy clearly emphasises the need to increase the supply of affordable housing, as documented in the Ministerial ‘Dear Chief Planning Officer’ letter published on 8th July 2019, Future Wales – *The National Plan 2040*, and PPW12. The unmet need for affordable housing is not being met through the general housing market in Conwy, and that has been the case historically in Conwy since the start of the LDP Plan Period in 2007 as evidenced earlier in this Statement.

6.66. In the continued absence of a forward housing strategy until such time that a Replacement LDP is adopted, the delivery of affordable housing and the weight to be afforded to it in line with PPW12 is considered to carry significant weight in support of the proposed development, subject to demonstrating compliance with wider policy considerations (as per part (g) of Policy HOU/6). This is considered to outweigh any conflict with Policy HOU/6 in respect of the location of Exception Sites.

Deliverability

6.67. The Applicant has agreed a contract with the current landowners to purchase the Site subject to receipt of a satisfactory planning permission. There are no legal matters which would preclude the deliverability of the proposed development (previous matters relating to probate have been resolved in full).

6.68. The Applicant would seek to complete the first property within 9 months of having obtained the legal rights to commence development (i.e following the discharge of any pre-commencement planning conditions and planning obligations). It would then be the intention to develop c. 40 no. dwellings a year, allowing for final completion of the scheme within c. 42 months of commencement.

6.69. Adra (Tai) Cyfyngedig has funding in place to carry out the proposed development and have assurances on the availability of Social Housing Grant Support from Conwy County Borough Council should the proposed development be approved.

Housing Mix

6.70. As set out in Section 4 of this Statement, the proposed development will comprise the following housing mix:

- 30 no. 2-person, 1-bed **apartments** at 51 square metres;
- 12 no. 3-person, 2-bed **apartments** at 65 square metres;
- 2 no. 3-person, 2-bed **bungalows** at 59 square metres;
- 10 no. 4-person, 2-bed **houses** at 83 square metres;
- 12 no. 4-person, 2-bed **houses** at 83 square metres;
- 1 no. 5-person, 3-bed **house** at 93 square metres;
- 2 no. 5-person, 3-bed **houses** at 96 square metres;
- 21 no. 5-person, 3-bed **houses** at 92 square metres;
- 4 no. 6-person, 4-bed **houses** at 114 square metres; and
- 1 no. 8-person, 5-bed **house** at 131 square metres.

6.71. The proposed net density across the Site will be 39.74 dwellings per hectare, having regard to the Site’s location, surroundings and technical constraints/configuration. Policy HOU/4 of the Local Development Plan seeks to achieve densities of 30 dwellings per hectare on allocated sites and large windfall sites; however, it does recognise that in some cases a lower density may be acceptable where natural and/or built environment and infrastructure constraints impact on the site layout. In this instance, the number of dwellings responds to local affordable housing needs having

regard to Policy HOU/6, whilst also seeking to positively address other policy requirements (on-site open space, play area, footways), as well as responding to site-specific constraints which require careful consideration.

- 6.72. The proposed development will comprise solely of 100% affordable housing in the form of social rented and intermediate (affordable rented) tenures. It is proposed that 66 no. properties will be social rent, and 29 no. properties intermediate rent (a split of 70%/30%) based on the submitted Affordable Housing Statement and Housing Mix Statement. The tenure split can be agreed with the Housing Strategy Team at Conwy County Borough Council prior to the determination of the Application.
- 6.73. In total, it is proposed that 95% of the proposed dwellings will comprise 3 or fewer bedrooms. 69% of the proposed dwellings will comprise 2 or fewer bedrooms. The provision of these smaller dwellings is considered to represent a significant benefit of the proposed development.
- 6.74. The proposed housing mix and tenure split has had regard to the needs identified in the Council's LHMA and the latest SARTH and Affordable Housing (Tai Teg) Registers, responding to the needs of both young and older households in the local area. The proposed mixed tenure approach has the ability to create a sustainable community, providing new housing for the older population as part of the development in the form of bungalows.
- 6.75. The size of the proposed dwellings complies with the Welsh Development Quality Requirements and the Lifetime Homes requirements.
- 6.76. As outlined earlier in this Section, the provision of affordable housing is a material planning consideration to be taken into account in the determination of this Application consistent with paragraph 4.2.25 of PPW12. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policies HOU1, HOU2, LDP13, TAN2, and PPW12.

Locational Sustainability

- 6.77. As demonstrated within Section 2 of this Statement, the Site evidently occupies a sustainable location. It benefits from good access to local services and amenities, and local bus services. It is well-connected via the existing footpath network within the settlement. As such, the proposal is capable of aligning with LDP Policy STR/3. The wider economic, social, environmental and cultural well-being benefits of the proposed development are considered in Section 7 of this Statement.

Historic Environment

- 6.78. As outlined in Section 2 of this Statement, the Site is not located within a Conservation Area, and there are no listed buildings on or immediately adjacent to the Site, the setting and significance of which might otherwise be affected by the proposed development. The nearest listed heritage asset to the Site is Brynglorian Farm Outbuildings located to the south-west of the Site, to the west of Llanrwst Road, within c. 50m-100m of the proposed Site access. The Site is physically and visually separated from other listed buildings within the community of Gyffin.
- 6.79. The Site also lies c. 200m south of the Essential Setting of the UNESCO World Heritage Site of Conwy Castle. There is some existing intervisibility between the western section of Conwy Town Wall and the Site.

6.80. To this end, a Landscape and Visual Appraisal has been prepared and is submitted as part of this Application. It is not the intention to repeat the full findings of this Appraisal in the Planning Statement. Notwithstanding this, the Appraisal has concluded as follows:

- The limited number of locations in land where the World Heritage Site can be experienced, along with its altered setting, does not detract from the significance of the World Heritage Site. However, it does mean that the proposed development, although partially visible from the western section of the town walls, will only have a minor impact on the setting of the World Heritage Site;
- The visual effects of the proposed development on the Conwy Town Walls will be moderate adverse as a result of a minor, detrimental magnitude of change. Whilst parts of the proposed development would be visible, views would be largely interrupted by existing structures and trees; and
- Suitable mitigation is capable of being provided, including the planting of suitable tree stock and screening vegetation along the northern boundary of the Site and the sympathetic finishing of the dwellings, this impact could be lowered to negligible.

6.81. Alongside the above, the following have been prepared and submitted as part of the Application in order to establish the potential archaeological value of the Site:

- Written Scheme of Investigation for a Desk-Based Assessment, dated June 2025;
- Written Scheme of Investigation for a Geophysical Survey, dated July 2025;
- Geophysical Survey, dated July 2025;
- Settings Assessment, dated July 2025; and
- Field Evaluation, dated August 2025;

6.82. It is not the intention to document the full findings of each of the aforementioned technical reports within this Statement.

6.83. Notwithstanding this, in conclusion the Field Evaluation of August 2025 has established the following:

- A shallow feature in Trench 1 and single postholes in Trenches 4 and 13. No function or date could be ascribed to the features within Trenches 4 and 13, although pottery from a bulk sample taken from the basal fill of the feature within Trench 1 contained a small quantity of fragmented middle Neolithic Impressed Ware pottery, alongside a dump of fuel waste charcoal, the range of species within which also reflected a prehistoric date;
- No archaeological remains were recorded in the other trenches; and
- None of the identified features corresponded to anomalies from the Terradat (2025) survey, nor did they align with field boundaries depicted on historic maps.

6.84. In view of the above, there are no identified archaeological constraints to the proposed development of the Site.

6.85. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policies CTH/1 and CTH/2, TAN24 and PPW12.

Special Landscape Area

6.86. As outlined in Section 4 of this Statement, the Site lies at the edge of the Creuddyn and Conwy Registered Historic Landscape and forms part of the Conwy Valley Special Landscape Area. It lies within LANDMAP Area CNWVS067, where the proposed development will need to satisfactorily integrate into the landscape.

6.87. To this end, a Landscape and Visual Appraisal has been prepared and is submitted as part of this Application. It is not the intention to repeat the full findings of this Appraisal in the Planning Statement. Notwithstanding this, the Appraisal has identified the following key landscape elements and visual considerations:

- Existing mature woodland on rising land along the eastern boundary of the Site is an extremely important landscape and visual element that should be protected;
- Linear block of woodland along the western boundary of the Site is also an important landscape feature that provides a visual screen from Llanrwst Road and likely to be of high ecological value. The woodland needs to be protected and not to be encroached on. Landscape buffer required for its protection and enhancement and future management /maintenance. This area may also be of archaeological interest as it may be part of a former quarry;
- Existing trees along the northern boundary of the Site need protection as they are an important visual barrier to the adjacent residential area. Preservation and additional landscape buffer to ensure longevity and opportunities for growth/replacement planting and maintenance;
- Upper reaches of the fields visible from Conwy Castle Walls and any changes to the topography of this section of the Site need to be resisted, the topography is a key landscape element of the Site;
- East-west hedgerows/linear belts of trees important visual elements that restrict views of the Site from northern vantage points;
- Access opportunities off Llanrwst Road are limited due to topography and existing oak trees;
- Glimpsed views of the Site from Llanrwst Road near property of Pen-y-Bryn to the south;
- Views of the Site from adjacent residential areas along west of Llanrwst Road and southern parts of Gyffin that overlook the Site; and
- No public rights of way cross the Site.

6.88. The proposed development has responded to the Site's location within the Special Landscape Area by way of the following:

- Retention and protection of existing woodland along the western boundary of the Site;
- Integrated blue and green infrastructure along the western perimeter of the Site providing SUDS, biodiversity, with informal public realm, paths and cycle route;
- Creation of east/west bands of green/blue infrastructure for surface water drainage, woodland strips for biodiversity enhancement, visual screening and shelter from north/south valley winds;
- Woodland belt along the northern boundary of the Site to enhance existing woodland and visual screening from adjacent properties with opportunities for provision of additional public rights of way to connect to the wider footpath network;
- North – south hedgerow planting along upper slopes for interconnecting habitat;
- Wildflower meadows on upper slopes to preserve existing views from north and the Conwy Castle Walls and to provide biodiversity enhancement;
- Three distinct areas or development zones ranging from high, medium, low density as an interpretation of dispersal and progression up the Conwy Valley;

- Site access to have appearance as rural lane, consider discrete car parking solutions with hedgerows/walls along front curtilage of properties;
- Site access to span east-west green blue infrastructure on open span bridges to ensure connectivity and free flowing surface water; and
- Turning facility for public transport at or close to entrance of Site.

6.89. In respect of the landscape and visual effects of the proposed development:

- There will be a *moderate adverse* landscape effect on the Conwy Valley Sides and Hills (Bryn-seiri);
- There will be no change to the Conwy Valley Sides and Hills (Bryn-mawr);
- No direct landscape impact is expected on Conwy Town, but there will be visual influences noted from residential areas and Conwy Town Walls. The magnitude is classified as Minor detriment due to the change from pastoral farmland to residential setting;
- The visual effects from the 14 no. viewpoints that have been assessed will range from Neutral to Slight Adverse to Moderate Adverse. No major adverse visual effects are identified.

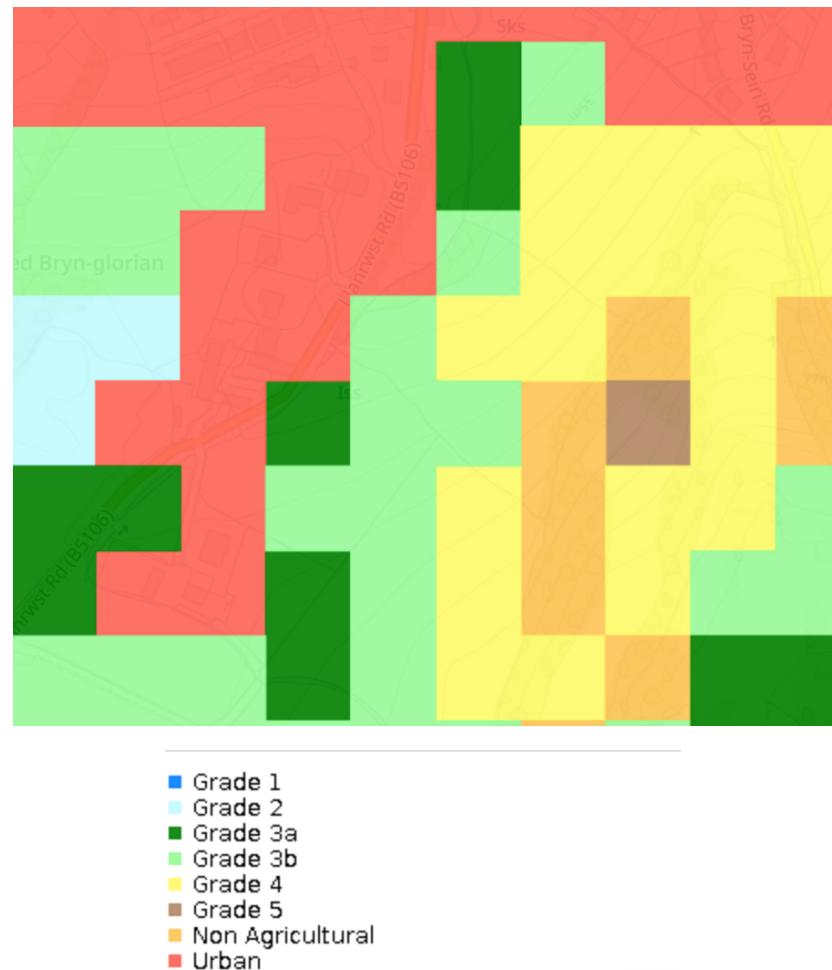
6.90. The proposed development has been designed to balance the amount of groundworks in the form of cut and fill. This is illustrated on the submitted Site Section drawings. The use of tiered gardens and retaining structures will also assist with the change in levels, alongside soft landscaping.

6.91. Accordingly, and having regard to the design response outline above, the proposed development is considered to respond positively to and is consistent with LDP Policy NTE/4, and PPW12.

Best and Most Versatile Agricultural Land

6.92. The Site is identified on the Welsh Government Predictive Agricultural Land Classification Mapping as predominantly comprising Grade 3b, Grade 4 and Urban land, with small pockets of Grade 3a land at the periphery. This is shown on *Figure 4* below:

Figure 4: Predictive Agricultural Land Classification of Site



Source: *DataMap Wales*

6.93. In light of the above, the Applicant has engaged with the Welsh Government Agricultural Directorate prior to the submission of this Application, who advised via e-mail on 10th December 2025 as follows:

“Agricultural Land Classification – Information

I can confirm we do not hold any information on detailed ALC field surveys for the site in question. According to the Predictive ALC Map the site mostly Subgrade 3b and Grade 4, with small, dispersed areas of Subgrade 3a noted (see below map). The main agricultural limitation on site is Gradient (+7 degrees).

Agricultural Land Classification – Advice

Due to the fragmented, small and irregular nature of the Subgrade 3a/BMV units within lower grade land, the Department advises that these areas could not be utilised to their full BMV capability – the site practically can be considered as Subgrade 3b at best. Therefore, exceptionally in this case, the Department does not recommend a detailed ALC field survey is undertaken, nor the application of BMV policy (PPW 3.58 and 3.59)

– however, it will be for the determining authority to take a view on this. This response relates to technical information only, not the merits or otherwise of any proposal, on which it is for the determining authority to take a view (TAN6; Annex B6)."

6.94. Turning to paragraph 3.59 of PPW12, this states:

"When considering the search sequence and in development plan policies and development management decisions, considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."

6.95. Based on the above, it is clear that PPW12 does not strictly preclude the development of best and most versatile agricultural land. Instead, it is necessary to satisfy the tests set out within paragraph 3.59; we undertake this exercise below:

a) There is an overriding need for the development;

6.96. It has been demonstrated within this Statement that there is a significant affordable housing need both in Conwy County and locally that simply will not be met without the release of greenfield land.

6.97. The Site, as land in the open countryside adjacent to the settlement boundary of Conwy, carries less protection value than other greenfield land around the County some of which is designated as Green Barrier. It is however recognised to form part of a much wider Special Landscape Area, albeit not one which is a site-specific designation.

6.98. Given the identified affordable housing needs set out within this Statement, it is considered that the delivery of affordable housing should be viewed as a significant priority for the Council. The loss of a very small parcel of Subgrade 3a best and most versatile agricultural land (which is fragmented, small and of an irregular nature) would not have a significant impact on the quantum of such land availability in Conwy nor around Conwy County based on the Welsh Government's ALC Mapping (and the amount of Grade 1, Grade 2 and Grade 3a land which is identified).

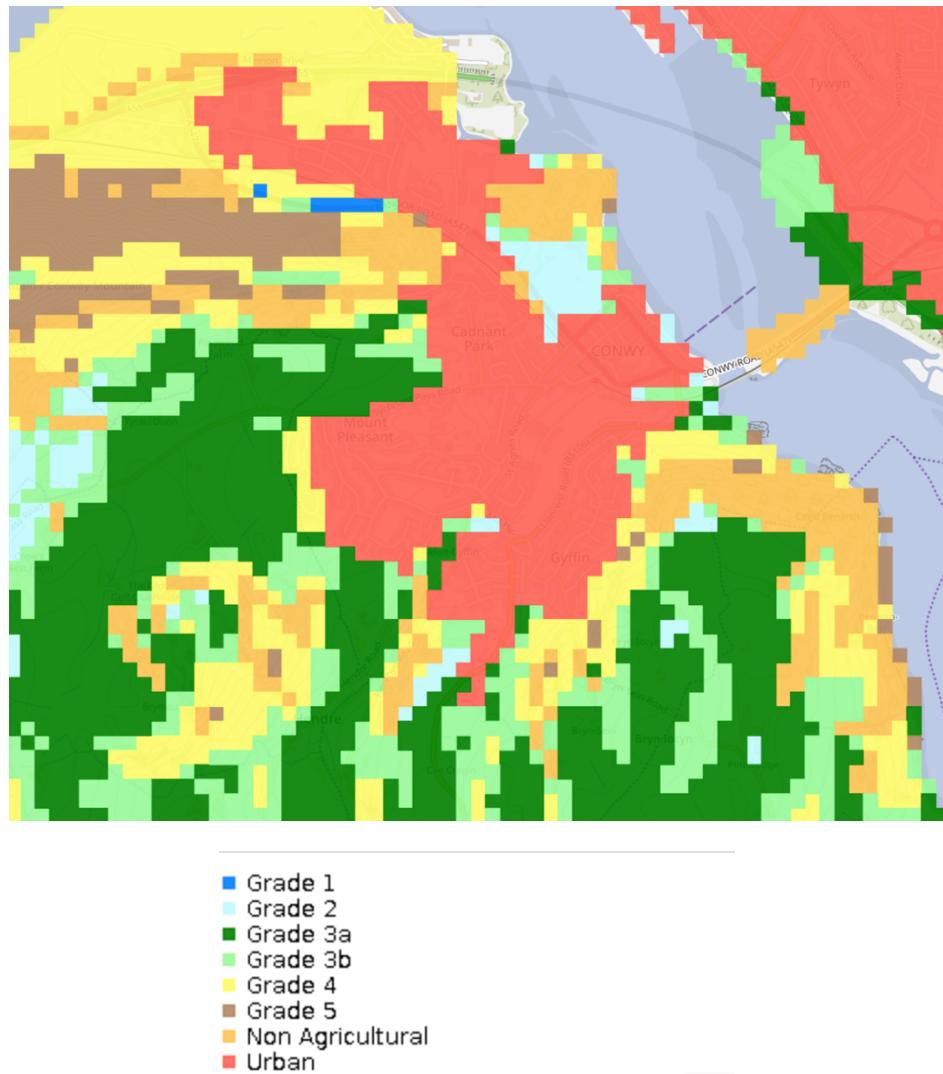
6.99. Whilst the loss of best and most versatile land is a material planning consideration, so too is a community's need for affordable housing consistent with paragraph 4.2.25 of PPW12; in the case of this Application, the delivery of 95 no. affordable homes to meet an identified need and housing shortfall is considered to significantly outweigh any harm arising from the loss of a single, contained parcel of agricultural land.

b) And, either previously developed land or land in lower agricultural grades is unavailable or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.

6.100. There is no previously developed land available in Conwy capable and available of contributing towards the outstanding affordable housing needs.

6.101. Furthermore, the ALC Mapping published by Welsh Government clearly demonstrates that there is no land of a lower agricultural grade available at the edge of the settlement boundary of Conwy, which is capable of being developed, to meet this need. This is shown on the extract below at *Figure 5*:

Figure 5: Predictive Agricultural Land Classification of Conwy



Source: DataMap Wales

6.102. Whilst it is acknowledged that PPW12 is a material planning consideration when it comes to the loss of best and most versatile agricultural land, the same applies in respect of meeting a community's affordable housing needs as per paragraph 4.2.25 of PPW12. For the purposes of this Application, the policy exceptions set out in paragraph 3.59 of PPW12 are considered to be fully satisfied to justify the proposed development of the Site in question.

6.103. The Council clearly needs to balance the importance of meeting affordable housing needs and the historic shortfall in housing delivery against the minor loss of Subgrade 3a best and most versatile agricultural land; however, given the lack of any sequentially preferable sites, it is unclear how the outstanding County-wide and local affordable housing needs will otherwise be met, particularly given the ongoing absence of a new LDP.

6.104. It is the Applicant's position that the proposed development satisfies the requirement of paragraph 3.59 of PPW12.

Layout and Design

6.105. As documented in Section 4 of this Statement, careful consideration has been afforded to the proposed layout taking account of the Site's surroundings (including neighbouring residential properties and the preservation of their amenity), policy requirements (i.e. road widths, visibility splays, pedestrian footways, drainage and surface water flood-risk) and technical considerations (topography, location within the Special Landscape Area, impact on heritage assets, impact on trees, and ecological features of value).

6.106. This has informed the preparation of a carefully designed layout to ensure a limited impact on existing trees within the Site as far as is physically possible, as well as the residential amenity of neighbouring residents to the north, west and south of the Site. The layout and siting of the proposed dwellings is in accordance with the Council's spacing standards.

6.107. The house types, plot sizes and proposed palette of materials are considered to be appropriate and proportionate to the Site and its location/surroundings. The layout will also allow for natural surveillance within the Site from properties with a view to designing out crime.

6.108. Each property is designed to allow for access by people of all abilities. This will ensure barrier free environments.

6.109. The proposed dwellings will be built to Development Quality Requirements, offering flexibility for the lifetime of the buildings. A series of sustainability measures are also proposed, as documented in Section 4 of this Statement.

6.110. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policies DP1, DP3, DP4, CFS/11, STR1, HOU4 and NTE/10, LDP9, TAN12, and PPW12.

Trees and Hedgerows

6.111. An Arboricultural Impact Assessment and Arboricultural Method Statement has been prepared and is submitted with the Application. This has assessed a total of 86 no. individual tree specimens (referenced as T1 to T86).

6.112. The Survey has established that the following will need to be removed to accommodate the proposed development (i.e. access roads, proposed re-grading works and SuDS), together with details of their assessed quality/category:

- **T6 – Category B1**
- **T7 – Category B1**
- **T8 – Category B1**
- **T9 – Category B1**
- **T37 – Category B1**
- **T38 – Category C1**
- **T39 – Category B1**
- **T40 – Category B1**
- **T41 – Category B1**

- **T42 – Category B1**
- **T43 – Category C1**
- **T44 – Category C1**
- **T45 – Category B1**
- **T46 – Category C1**
- **T47 – Category C1**
- **T48 – Category C1**
- **T49 – Category C1**
- **T67 – Category U**
- **T68 – Category C1**
- **T69 – Category U**

6.113. Trees T67 and T69 are recommended for removal due to their poor condition (Category U).

6.114. None of the specimens to be removed are identified as Category A trees worthy of retention.

6.115. The loss of these trees will be compensated for through new and replacement planting as shown on the submitted Landscape Plan and documented within the Outline Landscape Strategy.

6.116. A series of tree protection measures can be implemented to minimise/mitigate the impact of the proposed development on these species, including tree pruning, protective fencing and exclusion zones, and the accompanying Arboricultural Method Statement demonstrates that the proposed development can be undertaken with minimal adverse risk on those trees to be retained. All measures could be secured by way of planning condition.

6.117. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policy NTE/1, LDP40, TAN5, and PPW12.

Nature Conservation

6.118. An Ecological Impact Assessment has been undertaken across the Site. The conclusions are set out in Table 13 of the Assessment, and surmised below:

- The proposed development will have a **neutral/negligible** residual effect on the Aber Afon Conwy non-statutory designated site as a result of run-off from the Site during construction, and potential pollution incidences during and post construction;
- The proposed development will have a **minor/moderate** residual effect on Priority Habitats as a result of the proposed removal of Hedgerow HR3 and HR5, which currently serve as wildlife corridors;
- The proposed development will have a **minor/moderate** residual effect on hedgerows as a result of the proposed loss of hedgerows, resulting in a loss of connectivity of the landscape to wildlife;
- The proposed development will have a **minor/moderate** residual effect on badger species as a result of disturbance during construction and from increased human presence, and the removal of a badger sett;
- The proposed development will have a **moderate** residual effect on bat populations as a result of disturbance arising from the loss of suitably roosting, foraging and commuting habitat, disturbance to bat roost and fragmentation of bat flight lines;

- The proposed development will have a **minor** residual effect on bird populations as a result of disturbance to and loss of nesting and foraging habitat;
- The proposed development will have a **negligible** residual effect on hedgehogs as a result of disturbance during site clearance and potential obstruction to movement across habitats; and
- The proposed development will have a **neutral/negligible** residual effect on reptiles and amphibians as a result of disturbance during site clearance.

6.119. Following the recommendations of the Ecological Impact Assessment, the following additional surveys have been commissioned:

- Bat Survey; and
- Breeding Bird Survey.

6.120. The Bat Survey has established that the Site is used for foraging and commuting by bats. There is the potential for the loss or degradation of commuting and foraging habitats, leading to habitat fragmentation. It is not anticipated that there will be any loss of trees with the potential to support bat species but there may be the removal of section of hedgerows. Any removal will require a pre-assessment to survey for bat potential. A series of recommendations are set out within the accompanying Bat Survey Report, including the provision of bat boxes on trees and buildings.

6.121. The Breeding Bird Survey has established that the avian species assemblage returned by the desk study represented species typical of a very wide range of habitats, reflecting the variety present in the wider area surrounding the Site and its proximity to the coast. Notable records from the immediate vicinity of the Site included two records each of Chough and Barn Owl, and a single record of Red Kite. All are Schedule 1 breeding species for which there is suitable foraging habitat on the Site, with potential nesting habitat present in the wider area. The walkover surveys identified a breeding bird assemblage typical of the habitats present on the Site and in the surrounding area, and predominantly comprised species which are common and widespread. The great majority of records and identified Target Species territories were around the periphery of the Site and/or within the 50m buffer zone, due to the distribution of suitable habitat.

6.122. Section 8 of the Ecological Impact Assessment contains a number of mitigation and enhancement measures that can be adopted by receptor as part of the proposed development. The enhancement measures are designed to ensure that a net gain for local biodiversity is capable of being achieved. These include:

- 1.99 hectares (out of the 5.34 hectare gross total) of the Site will be retained as a wildlife meadow area. The upper slopes will be retained and managed as wildflower meadows;
- New native hedgerow planting to compensate for the loss of hedgerows HR3 and HR5;
- The use of swales and surface water attenuation basins;
- Further measures, such as the use of low-level lighting and the provision of bat and nesting bird boxes, will be considered during detailed design stages to address species specific impacts identified in separate surveys; and
- A Construction Environmental Management Plan (CEMP) is proposed to set out suitable mitigation measures to control emissions and waste during the build phase.

6.123. Some of these measures can be secured by way of a suitably worded condition(s).

6.124. Subject to following the guidance contained in the Assessment and subsequent surveys, the proposed development is considered to be consistent with LDP Policy NTE/1, NTE/3, LDP5, TAN5, and PPW12. It will not have a negative impact on protected species.

Hard and Soft Landscaping, and Open Assessment

6.125. As documented in Section 4 of this Statement, a Landscape Plan and Outline Landscape Strategy have been prepared and area submitted with the Application; these provides details of the Applicant's intentions to provide new tree and hedgerow planting across the Site.

6.126. Details of the proposed publicly accessible open space and green amenity space across the Site are provided in Section 4 of this Statement. An equipped area of play is also proposed within the Site. The quantum of open space that is proposed to be provided exceeds the Council's policy requirements.

6.127. Each of the proposed dwellings will benefit from its own outdoor garden space, both private and communal.

6.128. As outlined in Section 2 of this Statement, the nearest equipped area of play to the Site is currently located to the north off Mill Hill, within a short walking distance of the Site (c. 300m) via the proposed pedestrian connection to Isgoed. This also provides access to outdoor playing pitches adjacent to the east of the play area. To this end, the open space provision that is proposed as part of the proposed development is considered to be more than sufficient for the scale of the development and the housing mix (and the total number of occupants) that is proposed, given the availability of other open space provision within the locality and which is safely accessible from the Site.

6.129. In addition to the Landscape Plan, a Green Infrastructure Statement has been prepared and is submitted as part of the Application. This has demonstrated at Table 5.1 how the design development process has taken a step-wise approach to the provision of new green infrastructure as part of the proposed development and documents the habitats to be provided. This includes details of the number of planted trees, shrub planting, hedgerows, grassland and bird and bat boxes amongst others.

6.130. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policy CFS11, TAN16, and PPW12.

Highways, Road Safety and Car Parking

6.131. The only vehicular access into the Site will be secured through the creation of a new priority-junction access from Llanrwst Road at the south-western corner of the Site.

6.132. The Site access and internal road widths are compliant with the Council's design standards as documented in Section 4 of this Statement. The internal road layout has been designed to ensure the safe manoeuvring of a refuse vehicle, together with swept path analysis contained in the accompanying Transport Assessment.

6.133. In view of the Site's locational sustainability, the Applicant has been keen to provide for the safe movement of pedestrians within the Site and to provide connections to the surrounding pedestrian network and public transport services. This is reflected in the Proposed Site Plan, with a connection through to Isgoed to the north of the Site. The Applicant is also willing to update the existing unmarked bus stops on both of Llanrwst Road to the north of the Site; this could include the introduction of bus stop poles, shelters and hardstanding in these locations.

6.134. In respect of car parking provision within the Site (for both residents and visitors), details are provided in Section 4 of this Statement together with a justification for the car parking proposed in the accompanying Transport Assessment. The proposed development seeks to both facilitate and encourage sustainable modes of travel, reducing reliance on the private car.

6.135. The accompanying Transport Assessment submitted with the Application has assessed the potential impacts of the proposed development on the highway network and road safety. This has established that the proposed development is estimated to generate a total of 52 two-way vehicle movements in the AM peak hour and 52 two-way vehicle movements in the PM peak hour. The Transport Assessment has concluded that this increase in traffic will not have a material detrimental impact on the operation of the local highway network. This includes the junction on the local highway network that have been assessed as part of the Transport Assessment.

6.136. The latest available Crashmap data shows that there have been no recorded collisions on Llanrwst Road in the vicinity of the proposed development in the period 2019 to 2023. There is no identifiable collision problem on Llanrwst Road in the vicinity of the Site.

6.137. A Travel Plan has been prepared and submitted as part of the Application with a view to encouraging from the outset a positive sustainable transport awareness and culture for the proposed development. The measures set out in the Travel Plan will be reviewed and amended as appropriate, in consultation with and requiring the agreement of the Local Authority.

6.138. Having regard to the above, the proposed development is considered to respond positively to and is consistent with LDP Policies STR/1, STR/2, STR/3 and STR/4, LDP2, TAN18, and PPW12.

Welsh Language

6.139. A Community and Linguistic Impact Assessment has been prepared and is submitted with this Application. Whilst it is not the intention to repeat the full content of the Assessment here, in summary the Assessment has established that:

- The proposed development, given its scale and proposed tenures aimed to provide local people with access to an affordable home, has an opportunity to have a neutral to minor positive impact on the community characteristics of existing Welsh speakers;
- The proposed development will deliver a range and choice of housing to meet a diversity of local needs and achieve age structure balance and affordable housing; and
- A number of enhancement and mitigation measures could be provided as part of the proposed development, including a Welsh street name and bi-lingual signage, and the local advertisement of the proposed dwellings in Welsh and English which, together with the proposed delivery of affordable housing, could encourage local people to remain living within the area.

6.140. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policy CTH/5, LDP6, TAN20 and PPW12. The proposed development would not cause significant harm to the character and language balance of the community of the Ward of Conwy.

Flood-Risk and Drainage

6.141. As documented in Section 2 of this Statement, the majority of the Site lies in Flood Zone 1. Overall, the majority of the Site is deemed by Natural Resources Wales to be at a low risk of flooding. The overall risk to the proposed development is therefore low.

6.142. There is an existing watercourse along the western and part northern edges of the Site which will be retained and a suitable stand-off distance maintained.

6.143. In accordance with TAN15 and the latest national standards on Sustainable Urban Drainage Systems documented in the Flood and Water Management Act 2010, a drainage strategy has been prepared and is submitted with the Application. Details are set out in Section 4 of this Statement. This will ensure that the proposed development will not exceed the greenfield run-off rate and use SuDS to ensure that flood-risk is not increased on, adjacent or downstream of the Site.

6.144. Reference should be had to the accompanying Flood Consequences Assessment and Drainage Statement for full details, which includes a detailed consideration of the risk to life, disruption to people living and working in the area, impact on flood risk generally, and disruption to the sustainable management of resources.

6.145. Water conservation measures will be incorporated into the proposed development through the use of efficiency measures and the use of sustainable urban drainage systems. This is surmised in the accompanying Water Conservation Strategy.

6.146. Accordingly, and subject to the recommendations set out in the Strategy, the proposed development is considered to respond positively to and is consistent with LDP Policies NTE/8, NTE/9, NTE/10 and PPW12.

Ground Conditions

6.147. Given the nature of the proposed land-use, and the existing greenfield nature of the Site, a Phase 1 Ground Investigation has been prepared and is submitted within the Application. This has assessed the potential for existing/future sources of ground contamination on the Site, including desktop and intrusive investigations. In summary, it has established the following:

- The Site is not within a Coal Mining Reporting Area and the risk from historical coal mining activities are negligible. No other non-ferrous or ferrous metal mining has been identified in the vicinity of the Site;
- Some parts of this 1km grid square are in bands of elevated radon potential. The maximum radon potential is 5-10 % of dwellings above the action level. Basic Radon Protection measures are likely to be required. However, this should be confirmed through a site-specific radon report;
- Contamination is unlikely given the majority of the Site has been undeveloped from the earliest records and appears to have been in use as agricultural land up to present day. No contaminating industries have been identified near to the Site. The risk from contamination is therefore assessed to be negligible; and
- In respect of intrusive investigations, a total of 13 machine excavated trial pits were performed on the 12th of August 2025. No evidence of soil contamination was observed during the fieldwork.

6.148. Overall, it has been concluded that the Site is suitable for the proposed land-use, and no potential sources of contaminants of concern have been found.

6.149. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policy DP4, and PPW12.

Minerals Safeguarding

6.150. As documented in Section 5 of this Statement, the Site is identified as lying within a Sandstone Safeguarding Area under Policy MWS/3. This designation covers vast areas of land across the County. The loss of 2.39 hectares of net developable land adjacent to the settlement boundary of Conwy in response to identified affordable housing needs, is not considered such that it would be harmful to the availability of land for Sandstone Safeguarding and minerals availability across the County. The significant sustainability benefits associated with the proposed development, as documented in Section 7 of this Statement, are considered to outweigh that loss.

6.151. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policies MWS/1, MWS/2 and MWS/3, and PPW12.

Utilities

6.152. A Level 1 Utility Study has been prepared and is submitted as part of this Application.

6.153. This has established that based on the information currently available for review, the existing utility infrastructure within the vicinity of the Site appears to be capable of supporting the additional demand required to provide connections for the proposed development of 95 no. residential dwellings. As documented within the Study, there are existing electricity, clean water, and telecoms services in the vicinity of the Site, which may have sufficient capacity to serve the proposed development.

6.154. A new substation is proposed as part of the development, as referenced within the description of development.

6.155. Accordingly, the proposed development is considered to respond positively to and is consistent with LDP Policies DP/4 and DP/5.

Planning Conditions

6.156. As outlined within this Statement, the Applicant is willing to accept a number of planning conditions related to the proposed development where these satisfy the six tests set out in the Welsh Government Circular published in October 2014 and WGC 016/2014. These include, amongst others:

- Drainage (surface water and foul water);
- Materials;
- Affordable Housing;
- Construction and Environmental Management Plan, including details of construction hours and dust management;
- Landscaping (hard and soft), including tree planting;
- Finished floor levels;
- Tree protection measures during construction per the Arboricultural Method Statement;
- Reasonable avoidance measures (as per the recommendations of the Ecological Impact Assessment);
- Ecological mitigation and enhancement measures, as per the recommendations of the Ecological Impact Assessment;
- Travel Plan; and

- Street lighting.

Planning Obligations

6.157. The Applicant is committed to engaging in discussions with Officers at Conwy County Borough Council in relation to securing planning obligations where these satisfy the requirements of SPGN LDP4– *Planning Obligations* and Regulation 122 of the Community Infrastructure Levy Regulations which require that:

- The obligations must be necessary to make the proposed development acceptable in planning terms;
- The obligation must be directly related to the proposed development; and
- The obligations must be fairly and reasonably related in scale and kind to the proposed development.

6.158. Any requests for financial contributions, including education, which are consistent with the aforementioned policy tests must be justified by up-to-date evidence. This would align with Policy CFS/1 of the LDP.

7 CASE FOR DEVELOPMENT

7.1. Having regard to the Technical Assessment in Section 6 of this Statement, this Section goes on to consider the proposed development in the context of the overarching objectives of sustainable development as documented in paragraph 2.28 of PPW12.

Social Benefits

7.2. The proposed development will deliver the following **Social** benefits:

- The delivery of 95 no. new affordable homes, 100% of the proposed development consistent with LDP Policy HOU/6. These will comprise a mix of 1, 2, 3, 4 and 5 bedroom homes responding to the findings of the LHMA 2022-2027, Affordable Housing Prospectus, and the latest SARTH and Affordable Housing (Tai Teg) Housing Registers, and which will be accessible by local people. The dwellings will be split 70%/30% between social rented and intermediate rented tenures, with 95% of the proposed dwellings comprising 3 or fewer bedrooms. The delivery of these affordable homes which should be afforded significant weight in favour of the proposed development and which is a material planning consideration;
- The proposed development will not give cause to any harm to the role and function of the Conwy and the community area of Gyffin as a sustainable location for growth, reflective of its standing in the LDP settlement hierarchy;
- The creation of a high-quality living environment which is a) proportionate to the size of the settlement based on an acceptable density per hectare, b) positively contributes to the character and appearance of the Site and its context by raising the quality of design in the area, and c) is consistent with the Council's LDP, SPGNSs, Technical Advice Notes, and the placemaking aspirations set out in PPW12;
- The scale and nature of the proposed development will not pre-determine or prejudice the emerging Replacement LDP which remains some time from adoption, and there is no strategy in place at this time to address the ongoing shortfall in view of the time-expired nature of the adopted LDP. The proposed development would not be premature; and
- A scheme which is capable of being delivered within c. 42 no. months from commencement of development, making an immediate contribution towards identified affordable housing needs.

Economic Benefits

7.3. The proposed development will deliver the following **Economic** benefits:

- The creation of direct construction jobs (on and off-site) over the lifetime of the build programme, and indirect jobs through the local supply chain via the purchase of goods and services;
- Increased local expenditure (convenience, comparison, leisure, services) to help support and sustain the local community and businesses;

- Annual Council Tax contributions to Conwy County Borough Council from the 95 no. proposed new dwellings;
- Gross Value Added to the local economy generated by future residents of the proposed development; and
- Contribution to local education and off-site open space provision where this is justified by up-to-date evidence.

Environmental Benefits

7.4. The proposed development will deliver the following **Environmental** benefits:

- Existing trees and hedgerows within and at the perimeter of the Site will be retained as far as possible, alongside new tree planting which could provide the opportunity to achieve secure net gains in biodiversity. These are committed to by the Applicant in the accompanying Landscape Plan, Outline Landscape Strategy and Green Infrastructure Statement;
- The proposed development will not give cause to the loss of any features of significant ecological value, nor cause harm to any protected species, and the proposed layout has been designed to retain and protect the Site's areas of ecological value. The accompanying Green Infrastructure Statement documents how the proposed development is capable of achieving a net gain in biodiversity;
- The use of Sustainable Urban Drainage Systems to manage surface water which will not increase or exacerbate flood-risk elsewhere;
- Development on a sustainable site which provides the opportunity for future residents to travel by foot and public transport to access shops, education, jobs and services, reducing the reliance on private car travel and with it providing for a reduction in carbon emissions. The Site's location means that future residents will enjoy very good access to education, shops and services by walking and cycling consistent with the guidance criteria set out in the accompanying Transport Assessment. Where the use of the private car is required, the proposed development will not have a material detrimental impact on the operation of the local highway network. Furthermore, a Travel Plan is proposed to encourage the use of sustainable transport modes by future occupants of the proposed development from the very outset;
- The proposed development will not have a major adverse effect either visually or on the local landscape, nor on viewpoints assessed from 14 no. locations including the Conwy Town Walls;
- The proposed development will not have an adverse impact on the historic environment, nor create any adverse impacts in relation to noise, contamination, human health, and air quality/odour;
- The minor loss of Subgrade 3a best and most versatile agricultural land which is fragmented, small and irregular in nature will not result in a shortage of best and most versatile agricultural land around Conwy nor across the wider County; and

- The proposed development will provide for the construction of energy efficient homes as part of its sustainability credentials.

Cultural Well-Being

7.5. The proposed development will deliver the following **Cultural** benefits:

- The Applicant recognises the need to safeguard the Welsh language to encourage and provide for its use, consistent with Local Development Plan Policy RD5, SPGN – *Planning and the Welsh Language*, TAN 20 and PPW12. The Applicant recognises that the proposed development presents the opportunity for a neutral to minor positive community and linguistic impact. The Applicant is agreeable to the provision of bilingual signage within the proposed development amongst other measures such that the proposed development can support and sustain the Welsh language within the local community;
- The proposed development will not cause any major adverse harm to any existing heritage assets nor assets of cultural significance, including the UNESCO Conwy Castle World Heritage Site and any identified archaeological features; and
- There is no evidence to suggest or support any view that the proposed development cannot be integrated within the settlement, and nor that it would impact on the safety and cohesion of the community.

8 CONCLUSIONS

8.1. This Statement is submitted in support of a detailed Application for the proposed development of Land east of Llanrwst Road, Gyffin, Conwy.

8.2. The description of development for which detailed planning permission is sought is:

“Erection of 95 no. dwellings and associated infrastructure works including roads and footpaths, public open space, landscaping and drainage including a new sub-station”

8.3. This Statement has demonstrated that the proposed development is consistent with relevant policies contained within the LDP insofar as they remain consistent with national planning policy set out in PPW12, as well as other material considerations.

8.4. Whilst it is noted that residential development on the Site is a departure from the open countryside designation of the Site, there are considered to be a number of material planning considerations which collectively weigh in favour of the proposed development as documented in Section 6 of this Statement.

8.5. Given the time-expired nature of the LDP, and the continued absence of a Replacement LDP, there is a need to ensure that new housing continues to come forward in the most sustainable areas of the County to meet the ongoing housing needs; in particular, affordable housing given the affordability issues documented earlier in this Statement. This is all the more important in view of the historic shortfall in housing delivery across the County during the now time-expired LDP plan period 2007 and 2022.

8.6. The proposed development will deliver a well-balanced mix of much-needed new affordable housing provision, with 95% of the proposed dwellings comprising 3 or fewer bedrooms. Accordingly, the proposed housing mix responds to genuine evidence of affordable housing needs and is immediately deliverable by Adra (Tai) Cyfyngedig with access to grant funding.

8.7. The proposed development will represent a logical extension to the settlement pattern at its southern edge delivering a balanced mix of much-needed, high-quality affordable homes which provides for the efficient and sustainable use of the land.

8.8. In respect of the technical considerations assessed in Section 6 of this Statement, the proposed development will not give cause to any significantly harmful adverse technical and environmental impacts.

8.9. As set out in Section 7 of this Statement, the proposed development will generate a number of economic, social, environmental and cultural well-being benefits consistent with the overarching objectives set out in PPW12.

8.10. In determining this Application and assessing the compliance of the proposed development with the development plan, it is considered that the following weighting should be applied:

- In respect of the weighting to be applied in the determination of this Application, it is considered that the proposed development should attract **very significant weight** for the delivery of a balanced mix of 95 no. new affordable homes responding to the significant affordable housing need at a local and County-wide level, consistent with Policy HOU/6 of the development plan and paragraph 4.2.25 of PPW12;

- **Positive weight** should be afforded to the efficient use of a greenfield parcel of land at the edge of the defined settlement boundary of Conwy, in a sustainable location, to deliver much-needed new affordable homes;
- **Positive weight** should be attached to the ability to deliver 95 no. high-quality dwellings and a sustainable living environment consistent with development plan Policy DP1, ensuring that the scale, design and siting of the proposed dwellings will conserve the settlement's character and setting, and that the proposed dwellings are of an appropriate and sensitive scale and design so not to unduly harm the character and appearance of the Conwy Valley Special Landscape Area nor the UNESCO World Heritage Site of Conwy Castle. The proposed development is capable of assimilating comfortably with the surrounding context and local landscape;
- **Moderate weight** should be attached to the associated economic benefits of the proposed development;
- **Moderate weight** to the biodiversity net gain and hedgerow gain that is capable of being achieved on the Site, in line with the development plan and national planning policy/legislative requirements;
- **Moderate weight** to the provision of green infrastructure, ecological enhancement and public open space that is capable of being provided within the Site, integrated as part of the proposed development, full details of which can be secured by way of planning condition;
- **Moderate weight** should be attached to the potential neutral to minor positive impact on the Welsh Language;
- **Limited weight** should be afforded to the spatial and visual change arising from the proposed development, owing to the proposed extent of the identified developable area (informed by the Site levels and landscape and visual impact considerations), and the location of the Site adjacent to existing and permanent built form and road infrastructure which serve as significant urban influences and a backdrop to the Site. The proposed development will not result in any major adverse effects visually or on the landscape. The ability to address the significant affordable housing shortfall in Conwy County will inevitably require the release of greenfield land, and there is no land within the settlement boundary of Conwy (and Gyffin) to make any significant and worthwhile contribution towards this shortfall; and
- **Limited weight** to the minor loss of Subgrade 3 best and most versatile agricultural land given its fragmented, small and irregular nature, when balanced against the wider social, economic and environmental benefits set out in Section 7 of this Statement.

8.11. In the overall planning balance, the proposed sustainable development is considered to be acceptable; the Applicant therefore kindly requests that detailed planning permission be granted in accordance with Local Development Plan Policy DP1 and paragraph 1.18 of PPW12.

