



Land at Maes Merddyn, Brynsiencyn

Proposed Erection of 28. No. Dwellings and Associated Development

Planning Statement

Prepared for

Williams Homes (Bala) Ltd

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5072-PS01**



Document Control

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1.0 INTRODUCTION

- 1.1.1 This Planning Statement has been prepared on behalf of Williams Homes (Bala) Limited in support of a full planning application for 28 dwellings and associated development on Land at Maes Merddyn, Brynsiencyn, Anglesey (hereafter referred to as the 'Site').
- 1.1.2 The planning application is submitted to Isle of Anglesey County Council ('IoACC').

1.2 Structure of the Planning Statement

- 1.2.1 This Planning Statement is divided into six sections of which this introduction is **Section 1.0**.
- 1.2.2 **Section 2.0** describes the Site and its context, including any relevant planning history.
- 1.2.3 **Section 3.0** provides a description of the Proposed Development.
- 1.2.4 **Section 4.0** provides an overview of the planning policy context, including the Development Plan, National Planning Policy, and other relevant documents.
- 1.2.5 **Section 5.0** appraises the Proposed Development in relation to planning policy and technical considerations of relevance.
- 1.2.6 **Section 6.0** provides concise conclusions.



2.0 THE SITE AND ITS CONTEXT

2.1 Site Location and Surroundings

- 2.1.1 The site is situated on the north-western edge of the village of Brynsiencyn and adjacent to the A4080, which is the main road for the settlement.
- 2.1.2 The site is presently undeveloped rough ground, though it is largely subject to an implemented and thus extant permission for housing development.
- 2.1.3 The sites frontage/south-western edge is defined by a hedgerow and trees that separate the site from the adjoining footway with the A4080 beyond. The existing estate road 'stub' entrance into the site is set on this boundary. Beyond is an open field, with scattered development set in fields defining the character of the countryside beyond.
- 2.1.4 Similar boundary treatments define the site's south-eastern side, and separate it from the adjoining properties and their amenity areas. Beyond these is further residential development, with the heart of the village a short distance to the south-east.
- 2.1.5 A strip of trees and other vegetation define the north-eastern/read edge of the site and seperate it from the adjoining field, with scattered individual properties set beyond.
- 2.1.6 A wall, trees, and a hedgerow form the north-western edge of the site and separate it from the adjoining land and residential properties. A footpath runs along this boundary and crosses into the northern-most edge of the site.
- 2.1.7 From the above it can clearly be seen that the site is set amongst other development and thus is located within the built form of the village.
- 2.1.8 The Site is located within Flood Zone A on the extant Development Advice Map and Zone 1 on the draft Flood Map for Planning, which means it has a low probability of flooding from rivers and the sea. There is also low risk of flooding from surface waters.
- 2.1.9 The Site is not covered by any international or national land-use designations. However, it is located close to Ynys Môn National Landscape (formerly known as an Area of Outstanding Natural Beauty) which is set to the south/south east, though at



some distance and with intervening development between the designation and the site.

- 2.1.10 There are some Heritage Assets located close to the site, including several Listed Buildings, but these are not adjacent to the Site and their setting would not be harmed by the proposals.
- 2.1.11 Services and facilities in the village include a primary school, a public house, a convenience stores, a post office, a village hall, and other facilities. There are also outdoor sport and other recreation facilities within the settlement.
- 2.1.12 The closest bus stops are directly to the south of the site on the A4080, with bus numbers 42 providing services to Llangefni, Llanfair PG, Newborough, Menai Bridge, Bangor, and other key settlements.
- 2.1.13 A footpath crosses into the north-eastern edge of the site.

2.2 Planning History

- 2.2.1 A review of IoACC's online planning register has revealed several previous applications on the site, with a large part of the site benefitting from an implemented and thus extant planning permission formed by consents 37C26T/VAR and RM/2018/5. That consent allows for the erection of 13 no. dwellings, of which only 4 would be affordable. This clear fallback is material to the application, as is the considerable benefit to the community of securing affordable and smaller lower cost dwellings instead of large open market properties.
- 2.2.2 This proposal follows a recently withdrawn application (FPL/2024/199) for 31 dwellings on the site, and is in an evolution of the scheme put forward in that case.



3.0 THE PROPOSED DEVELOPMENT

3.1.1 The proposal is a full application for the residential development of the Site with 28 no. dwellings together with associated development. The proposal includes the following development:-

- Erection of 28 no. dwellings (comprising 20 no. houses and 8 no. flats, with 19 of the properties to be affordable and 9 open market), together with their associated garden areas;
- Use of an existing vehicular and pedestrian access (from the extant permission on the site) and formation of an internal access road and pedestrian footways to serve the proposal, and formation of off-road parking spaces to serve the proposal;
- Provision of hard and soft landscaping per the proposed plans, inclusive of informal children's play space and 'green infrastructure/biodiversity' measures;
- Formation of foul and surface water drainage systems per the proposed plans;
- Other minor associated development as per the submitted plans & documents.

3.1.2 It is important to note that in this case the proposal is for a hybrid development, in that the majority of the dwellings are being put forward as an exception site (i.e. a site outside of the development boundary and thus being advanced in partnership with Clwyd Alyn on the basis of a clear need for affordable housing) but that 9 of the dwellings on the scheme are proposed as open market dwellings as a large part of the site benefits from an implemented and thus extant planning permission (formed by consents 37C26T/VAR and RM/2018/5) that allows for the erection of 13 no. dwellings, of which 9 would be open market and 4 would be affordable. This clear fallback is material to the application, hence the inclusion of the open market element within the scheme. Also materially relevant is the considerable benefit to the community of securing affordable dwellings to meet local need for the same.

3.1.3 As the proposal constitutes a 'Major Development' it will be subject to a statutory pre-application consultation exercise. Details of the responses received and an explanation of the manner in which these have been addressed will be provided in



the Pre-Application Consultation (PAC) Report submitted as part of the application as per the DMPW (Amendment) Order 2016 (as amended) requirements.

- 3.1.4 The scheme has also been subject of a pre-application enquiry (ref:- PALM/2022/6 – Dated:- 20/01/2023) and subsequent discussions with the LPA, and the advice given has been addressed in the production of the application. Details of that pre-planning enquiry and any subsequent discussions will be examined where relevant in section 5 of this statement. In addition, matters discussed in the preceding application will also be examined where relevant.



4.0 PLANNING POLICY CONTEXT

4.1 Introduction

- 4.1.1 There are a number of policies relevant to this proposal. These are briefly detailed below, with the following section summarising the key material considerations for the proposal and referring to the relevant policy where required:-

4.2 National Planning Policy

Planning Policy Wales (PPW) 12th Ed. (2024)

- 4.2.1 The following chapters and paragraphs are of relevance as they set out policy requirements in respect of key material considerations that impact upon this application:-
- 4.2.2 Chapter 2 of PPW brings into policy the concept of Placemaking which is considered to be fundamental to the goals of the planning system. The key principles underlying placemaking are set out in this section.
- 4.2.3 Chapter 2 also sets out, and in particular Figures 4 and 5 and the accompanying text, the general planning and sustainable place marking principles which are intended to underpin decision making for all development. In particular the principles of:-
- Growing our economy in a sustainable manner
 - Making best use of resources
 - Facilitating accessible and healthy environments
 - Creating and sustaining communities
 - Maximising environmental protection and limiting environmental impact
- 4.2.4 Turning to the National Sustainable Placemaking Outcomes (Figure 5) the following are particularly:-

Creating and Sustaining Communities

- Enabling the Welsh Language to thrive
- Appropriate development densities



- Homes and jobs to meet society's needs
- Community based facilities and services

Making Best Use of Resources

- Makes best use of natural resources
- Prevents waste
- Prioritises the use of previously developed land and existing buildings
- Unlocks potential and regenerates
- High quality and built to last

Maximising Environmental Protection and Limiting Environmental Impact

- Resilient biodiversity and ecosystems
- Distinctive and special landscapes
- Integrated green infrastructure
- Appropriate soundscapes
- Reduces environmental risks
- Manages water resources naturally
- Clean air
- Reduces overall pollution
- Resilient to climate change
- Distinctive and special historic environments

Facilitating Accessible and Healthy Environments

- Accessible and high-quality green space
- Accessible by means of active travel and public transport
- Not car dependent
- Minimises the need to travel
- Provides equality of access
- Feels safe and inclusive
- Supports a diverse population
- Good connections
- Convenient access to goods and services
- Promotes physical and mental health and well-being



- 4.2.5 Key objectives and requirements for good design are set out in para's 3.3-3.16 with key themes being inclusivity & accessibility (3.5-3.6), environmental sustainability (3.7-3.8), character & context (3.9-3.10, 3.14), community safety (3.11), movement (3.12-3.13).
- 4.2.6 Para's 3.15 & 3.16 provide guidance on how to consider issues of design, requiring Authority's to have policies and guidance to promote good design and provide a robust basis for refusal of poor-quality design. This work should also take place for strategic issues including plan allocations. When considering design an Authority is required to seek to improve poor or average designs, and to reject them where they are not successful with clearly articulated grounds required in any refusal. However, it is clearly stated that *"they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions"*.
- 4.2.7 Para's 3.19-3.24, and in particular 3.22, highlight the importance of ensuring that healthy and active lifestyles are provided for a wide range of communities and people, both through improving urban areas, and also making appropriate use of the rural environment.
- 4.2.8 Para's 3.25-3.29 identify the importance of the Welsh Language and requires LPAs to consider the likely effects of development upon the Welsh Language and include policies within the LDP's assessing impacts.
- 4.2.9 Specific guidance is set out on placemaking in rural areas in para's 3.38-3.40 with decision makers required to strike an appropriate balance between preserving the attributes of rural localities with the need to meet the economic, social and recreational needs of local communities and visitors (para. 3.38). It is noted that the general priority is to locate new development in more sustainable locations within or around existing settlements (3.39-3.40, & 3.60), which would be achieved by this scheme.
- 4.2.10 Section 4.1 provides overarching guidance on issues of relevance to transport, with a key priority being to enable more sustainable travel, utilise existing capacity effectively, and managing demand (in particular by reducing reliance upon the use of private cars).



- 4.2.11 Para's 4.1.9-4.1.18 set out details of the preferred approach to reducing car use, though facilitating development in accessible locations, and utilising the transport hierarchy which prioritises walking and cycling and then public transport over ULE and other private vehicles.
- 4.2.12 Para's 4.1.19-4.1.25 provide a considerable amount of guidance on creating active and social streets that are well designed and people orientated as this is seen to be a key driver of sustainability. Streets are required to give a high priority to their role as public spaces and to the needs of pedestrians, cyclists, and public transport. A break from engineering lead design standards is advocated and more green infrastructure integration. Reference is also made to other Welsh Government policy and Manual for Streets 1 and 2. This is also picked up in para's 4.1.44-4.1.45 in terms of traffic management and the role of street design in this.
- 4.2.13 Detail on policy concerning active travel is set out in para's 4.1.26-35, setting out the duty placed on Authority's to identify and plan for this issue through protection and improvement of existing infrastructure and routes, and provision of new infrastructure where required. There is also a priority placed on LPAs to ensure that development accounts for and integrates with active travel principles and networks, and where required contributes to the improvements of existing routes and provides new ones as well as providing supporting infrastructure within the development (e.g. cycle parking and changing areas etc.).
- 4.2.14 There is clear guidance (in para's 4.1.36-4.1.39) on directing development in urban and rural areas to sites that are most accessible by public transport.
- 4.2.15 Para's 4.1.49-4.1.54 set out a general approach to car parking, with an emphasis on reducing parking levels wherever possible to take account of the accessibility of sites by other modes.
- 4.2.16 Section 4.2 sets out overarching policy and strategy on housing and key issues, with the key priorities being to:- deliver an adequate supply of housing land to meet needs of communities across all tenures; providing well-designed, sustainable, and good quality housing in all tenures to meet community's needs; and focusing upon the delivery of an identified housing requirement and the required land supply.



- 4.2.17 Affordable housing is tackled in para's 4.2.25-4.2.33, requiring Authorities to identify a community wide need across different categories of sites and contributions, and to set appropriate thresholds & targets, including requirements for commuted sums if sites fall below set thresholds. It also emphasises the importance of viability, sets out a requirement for viability assessment to take place on an open book basis (as per para. 4.2.21).
- 4.2.18 Para. 4.2.34 requires that Authorities must consider affordable housing exception sites where suitably justified by need, and requires that suitable policies are put in place to handle such cases that clearly identify that such cases are an exception and set out suitable criteria to assess applications. The para. also requires that such sites meet the needs of local people in perpetuity, and that market housing is not allowed on them.
- 4.2.19 Section 4.5 sets out the requirements for Authority's to consider and plan for their communities needs for recreational spaces, both through policies for new spaces (including through delivery as part of development schemes) and by protecting existing spaces. This includes a requirement to consider broader sport, recreational and leisure facilities, as well as formal and informal open spaces.
- 4.2.20 Section 5.8 sets out guidance on requirement to improve energy use and sustainability of new buildings, and to ensure that development takes account of these principles in its design and specification.
- 4.2.21 Section 6.1 sets out broad ranging policy covering all aspects of the historic environment, and the requirement to conserve and enhance it.
- 4.2.22 Section 6.1.7 identifying the importance that the planning system has in protecting, conserving and enhancing the significant of historic assets. This includes consideration of the setting of the historic asset which might extend beyond its curtilage. Any change that impacts on the historic asset or its setting should be managed in a sensitive and sustainable way.
- 4.2.23 Section 6.1.8 sets out that it is the responsibility of all those with an interest in the planning system, including planning authorities, applicants, developers and communities to appropriately care for the historic environment in their area. The



protection, conservation and enhancement of historic assets is most effective when it is considered at the earliest stage of plan preparation or when designing proposals.

- 4.2.24 Guidance on addressing sites with designated remains or sites that are not-designated but have the potential to contain features of value is set out 6.1.23-6.1.27, and except where sites are of national importance there is requirement that Authorities balance the importance of the remains and their setting against the requirement for development. In all cases where remains exist or may exist then a sufficient assessment is required, and where they are present then suitable measures must be proposed and secured to investigate and record them, and to deposit the resulting finds/information in an approved repository.
- 4.2.25 Section 6.2 of PPW addresses the concept of Green Infrastructure (GI) which is the *“network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places”* at various different scales from landscape scale features such as wetlands, waterways, peatlands etc. to individual local features such as parks, fields, ponds, to individual trees and hedgerows etc. These features are of value to protecting, maintaining and enhancing biodiversity and ecosystem resilience by connecting different eco systems and improving their condition and extant. Thus, the protection and improvement of GI is an important way that the LPA’s can deliver their duties under 6 of The Environment Wales Act (2016). GI also is capable of providing multiple benefits to matters such as flood management, air quality, leisure spaces, sense of place etc.
- 4.2.26 Para’s 6.2.6 to 6.2.10 require that LPA’s must produce Green Infrastructure Assessments to detail existing GI and ecological assets and networks, with these required as part of work to underpin development plans. With clear objectives and benefits from these assessments set out in para. 6.2.9. This should include work to identify measures to adapt to climate change and other pressures, and that avoid or reverse habitat fragmentation, improve connectivity, and achieve other benefits such as restoration and improvement of land, landscapes, and ecosystems.
- 4.2.27 Para’s 6.2.11 to 6.2.14 then set out how GI should be addressed in development, with schemes required to account for it in site selection and design, integrate GI into development, and deliver multiple benefits.



- 4.2.28 All applications are required to be accompanied by a Green Infrastructure Statement (GIS) of a scale proportionate to the scale and nature of the development proposed per para. 6.2.12, and for minor development can be a short description and should not be an onerous requirement for the Applicant. This must describe how GI has been incorporated into the proposal, from smaller scale measures such as site landscape, SuDS feature, green roofs etc to larger scale measures such as woodland, habitat linkages, meadows etc. This must be built up from baseline data on the site and scheme such as “*habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links*”. The GIS and development proposal should also be informed by the GIA for the area, and the Building with Nature Standard is also mentioned as being of value.
- 4.2.29 Section 6.3 sets out policy concerning landscapes, noting that all landscapes are valued and that their special characteristics should be protected and enhanced whilst paying “*due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places*”.
- 4.2.30 Section 6.4 sets out the approach to ensuring that the planning system plays its part in reversing the decline in biodiversity and improving ecosystem resilience by protecting against losses and securing enhancements (6.4.1-6.4.41). A key concept within this is the delivery of biodiversity net gain (BnG) and ecosystem resilience, with the required steps meaning that biodiversity and ecosystem reliance must be addressed at the early stages of both development plan and development proposal preparation.
- 4.2.31 Para. 6.4.5 provides greater detail on this point and states that “*a net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site*”. A stepwise approach to achieving this is then set out as figure 1X and its accompanying paragraphs, which provide detailed guidance on how a suitable approach can be achieved. Off-site measures are included in this stepwise approach as a last resort, though this must be of significant magnitude to

- fully compensate for any loss and only after it is evident that other solutions or sites for development are not suitable.
- 4.2.32 Para. 6.4.11-6.4.16 sets out more detail on the approach to maintaining and enhancing biodiversity, with a stepwise approach set out requiring that losses are first avoided where possible, minimized where not, then mitigated, and as a last resort that compensation is provided. Enhancement should be secured primarily on site or immediately adjacent to it, over and above the level required to mitigate or create for negative impacts.
- 4.2.33 Para. 6.4.12 states that evidence of this work must be provided in the GIS. Where evidence of steps to achieve enhancement is not provided then significant weight must be given to its absence, and unless there are significant material considerations otherwise such a proposal should be refused.
- 4.2.34 6.4.16 is a new paragraph that sets out expectations that all applications are accompanied by pre-application surveys, research, and data surveys to establish the baseline state of a site, and its contribution to *“resilient ecological networks through its diversity, extent, connectivity and condition and the provision of ecosystem services”*. Such work is vital to delivering a proportionate response to significance of any impact. It is notable that the para. also states for householder scale schemes that LPA’s are directed to outline their expectations regarding information required as part of householder applications, and that enhancement measures sought must be proportionate to the scale of the development.
- 4.2.35 This para. also states that pre-emptive clearance work must not take place, and where this takes place the biodiversity value of the site should be taken from its state prior to clearance, and in the absence of evidence to the contrary it will be assumed to be good.
- 4.2.36 Finally, the para. confirms that all schemes must deliver net benefit for biodiversity and ecosystem resilience, including where the value of a site is maintained.
- 4.2.37 Para’s 6.4.10-20 set out guidance on the differing levels of nature conservation designation, ranging from international down to local level non-statutory designations. The key principle is that the relative value of the designation must be assessed, and that the impact of a proposal must be fully considered to ensure that



adverse impacts are avoided (unless in certain cases the scheme is of sufficient importance and there is no feasible alternative, with greater weight against development in the highest tiers of designation).

- 4.2.38 The role of non-statutory sites is also recognised in para's 6.4.31-6.4.33 with such sites forming part of habitat networks and delivering key value for biodiversity. GIA will be a key consideration when assessing schemes that may impact upon such sites. Appropriate developments can be advanced on such sites provided that it clear that adverse impacts are avoided, or where such harm is unavoidable it is minimised through mitigation measures and offset delivered to ensure that there is overall no loss in value or area, and that net benefit for biodiversity is delivered.
- 4.2.39 Para's 6.4.34-6.4.36 set out guidance on how matters related to protected species and their habitat must be dealt with.
- 4.2.40 Para. 6.4.37 states that trees, hedgerows, groups of trees and woodlands are of great importance for biodiversity, as well as providing other benefits to landscape, culture, heritage, sense of place, air quality, recreation, and local climate moderation as well as tackling climate change. Promotion by LPA's of new tree (individual, group, and woodland) and hedgerow planting as part of development is encouraged. Welsh native species are noted as being of particular benefit.
- 4.2.41 LPA's are directed (in para. 6.4.39) to protect trees, hedgerows, groups of trees and woodlands where they "have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function".
- 4.2.42 Para. 6.4.40 states that where *"trees, woodland and hedgerows are present, their retention, protection and integration should be identified within planning applications"*, with this being key where they are capable of making a significant contribution to the area. This includes planning of services & utilities to sites. Where trees are lost a set replacement ratio is set out later in PPW.
- 4.2.43 Para. 6.4.41 also notes that rural trees are also of value, with positive mechanisms to allow retention of rural trees expected to be delivered.
- 4.2.44 Para. 6.4.42 states that where removals are required then this must achieve significant and clearly defined public benefits, and that the step wise approach set out in para. 6.42 must be taken first. Where loss is unavoidable compensatory

planting of a proportionate value must be delivered at a suitable ratio, but as a minimum at 3 trees of a similar type and compensatory size for every 1 lost. Where a woodland or shelter belt is to be removed then any replacement must also be suitable, and at a minimum *“of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers”*.

- 4.2.45 Para. 6.4.44 sets the expectation that planting of trees and hedgerows is delivered through suitable locally specific policies and strategies, conditions as part of consents, and/or by making of TPOs. This should also form part of GIA and plans.
- 4.2.46 Following the introduction of national mandatory SuDS standards and the SAB process SuDS requirements are flagged up in para's 6.6.17-6.6.19 as a key issue in any new development, and especially for those exceeding the relevant threshold.
- 4.2.47 Para's 6.6.20-6.6.21 express the requirement to utilise sewers in areas served by them, and where they are not present that suitable detail is provided on alternative systems.

Technical Advice Notes (TANs)

TAN 2 – Planning and Affordable Housing - 2006

- 4.2.48 This guidance document is relevant as it expands upon the approach to affordable housing set out in chapter 9 of PPW and provides greater detail on the approach to securing and providing affordable housing, including assessing the viability of schemes. There is also the aspect of 'need' and whether or not the affordable provision already approved is sufficient.

TAN 5 – Nature Conservation & Planning - 2009

- 4.2.49 Again, this TAN is relevant due to the potential for the site to host protected or priority species and/or habitats.

TAN 12 – Design - 2016

- 4.2.50 TAN12 is relevant as the proposal involves the construction of new buildings on the site and so its guidance on good design applies to the scheme.

TAN 16 – Sport Recreation and Open Space (2009)



- 4.2.51 This TAN is relevant due to the guidance that it sets out on providing open space in new developments.

TAN 18 – Transport - 2007

- 4.2.52 TAN18 is directly relevant to this application as it sets out the direction for transportation strategies that planning authorities should adopt at a policy level. In particular, the sections on maximum parking standards and the need to consider accessibility of sites set out in para's 4.6-4.7 are relevant.

TAN 20 – Planning and the Welsh Language – 2017

- 4.2.53 This TAN sets out greater detail on the approach to assessing and addressing impacts upon the Welsh Language through the LDP process and in development control decisions.

4.3 Local Planning Policy

Joint Anglesey & Gwynedd Local Development Plan (JLDP) – (2017)

- 4.3.1 The **JLDP** provides key policy against which the proposal should be determined, and sets out a variety of policies which are of relevance to the proposal, which include:-
- 4.3.2 **Policy PS1: Welsh Language and Culture** – Sets out thresholds beyond which development will trigger the requirement for a Welsh Language Statement, or in the case of more substantial developments a Welsh Language Impact Assessment.
- 4.3.3 **Policy PS 2 & ISA 1 - Infrastructure and Developer Contributions & Infrastructure Provision** – Set out requirements that developments must provide or be served by sufficient infrastructure, and that where such infrastructure does not exist or has inadequate capacity then this must be provided either as part of the development or through financial contributions towards new infrastructure in the locality.
- 4.3.4 **Policy ISA 5 - Provision of Open Spaces in New Housing Developments** – This policy is of relevance only due to the fact that this scheme exceeds the 10 or more unit threshold where there is a requirement to provide open space, or exceptionally provide off-site space or contribute towards new or improved facilities in the locality.



- 4.3.5 **Policy PS 4: Sustainable Transport, Development and Accessibility** - This policy sets out the high-level principles for matters relating to transport and accessibility within the plan area and summarises key material issues that are of relevance for this broad material consideration.
- 4.3.6 **Policy TRA 1: Transport network developments** - is of some relevance to the scheme as it set out a requirement for schemes over a certain threshold or in sensitive areas that substantially increase journeys to provide a Transport Assessment. This will not be the case in this development proposal.
- 4.3.7 **Policy TRA 2: Parking Standards** – Defines the LPA’s parking standards for all modes of transport (by reference to a relevant SPG).
- 4.3.8 **Policy TRA 4: Managing Transport Impacts** – This policy defines the transport and access hierarchy for proposals to be assessed by, and requires that development accounts for this hierarchy and does not cause unacceptable harm.
- 4.3.9 **Policy PS 5: Sustainable Development** – This policy confirms that development will be supported where it is demonstrated that it is consistent with the principles of sustainable development.
- 4.3.10 **Policy PS 6: Alleviating and Adapting to The Effects of Climate Change** – This policy is the companion to PS 5 and requires that development includes specific aspects which will assist in alleviating the effects of climate change.
- 4.3.11 **Policy PCYFF 1: Development Boundaries** – This policy defines the plans policy in respect of the approach to development within or outside development boundaries, stating that:- for development within them that this will be allowed subject to compliance with specific policy relevant to the nature of development proposed; or, for development outside boundaries that it will only be allowed where it complies with specific policy within the JLDP or national policy, or where a countryside location is proved to be essential.
- 4.3.12 **Policy PCYFF 2: Development Criteria** – This policy sets out the key criteria which apply to development proposals across the plan area, detailing things which development should provide and also areas where if unacceptable impacts are identified a development will be refused.



- 4.3.13 **Policy PCYFF 3: Design and Place Shaping** – This is the overarching design policy for the plan and sets out all the key issues which relate to good quality design and development.
- 4.3.14 **Policy PCYFF 4: Design and Landscaping** - This is the overarching design and landscaping policy for the plan and sets out the key issues relating to landscape which relate to good quality design and development.
- 4.3.15 **Policy PCYFF 5: Carbon Management** – This policy defines efficient energy design, requiring that the schemes demonstrate any contribution from renewable or low carbon energy sources in minimising a proposal's energy requirement and production of waste. It also sets out a requirement for certain scales of development to provide an Energy Assessment.
- 4.3.16 **Policy PCYFF 6: Water Conservation** – This policy defines requirements for efficient usage and best practice of the management of water consumption and drainage of a proposal. Again, it set out a requirement that a Water Conservation Statement be provided for major development schemes.
- 4.3.17 **Policy TAI 8: Appropriate Housing Mix** –This policy requires an appropriate housing mix on new residential development sites. This has been thought through with advice from the appropriate bodies.
- 4.3.18 **Policy TAI 4: Housing in Local, Rural & Coastal Villages** – This policy sets out the housing strategy for the proposed site's location, stating that housing development will be delivered through windfall sites within the development boundary, and setting out an indicative maximum provision of windfall sites within the settlement. It also requires that the size, scale, and type of development corresponds with the settlements character.
- 4.3.19 **TAI 8: Appropriate Housing Mix** – This policy seeks to intervene in the mix of housing units delivered on sites in order to “*improve the balance of housing and meets the identified needs of the whole community*”. This includes both affordable and special needs housing, and also has links to density and housing design policies.
- 4.3.20 **Policy TAI 15: Affordable Housing Threshold & Distribution** - This policy set out thresholds for residential development beyond which affordable housing conditions will be sought at expected percentages of the dwellings on site.

- 4.3.21 **Policy TAI 16: Exception Sites** – The requirements for exception sites are set out in this policy, which are that there is a proven need for affordable housing that cannot be met within the development boundary, that such sites are immediately adjacent to development boundaries and form a reasonable extension, and that the development is of a proportionate and suitable small scale for the settlement (unless set requirements are met where larger schemes will be allowed and with a preference given to previously developed land).
- 4.3.22 **Strategic Policy PS 19: Conserving and where Appropriate Enhancing the Natural Environment** – Sets out high level policy to conserve and where appropriate enhance the natural environment, countryside and coastline of the plan area, and not to allow developments that have significant adverse effects except where the benefits of a development clearly outweigh the harms. The policy also sets out key points which must be given consideration when assessing applications, including impacts upon habitats & species, geology, and landscapes, designated sites, biodiversity, green & blue infrastructure, trees hedgerows & woodlands.
- 4.3.23 **AMG 3: Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character** – Guidance is given in this policy that requires consideration of features and qualities that are distinct to local landscapes, and which requires that where proposals would have a significant adverse impact upon landscape character (as per LCA's) that this has been considered in designing the development and selecting the site.
- 4.3.24 **Policy AMG 5: Local Biodiversity Conversation** – This policy ensures that biodiversity is identified and protected in all proposals, and that mitigation and/or enhancement is provided as part of new development.
- 4.3.25 **Policy PS 20: Preserving and where appropriate enhancing heritage assets** – This policy sets out the strategic framework for development affecting heritage assets and the objective of ensuring that development should preserve and where appropriate enhance such assets.
- 4.3.26 **Policy AT4: Protection of non-designated archaeological sites and their setting** Detail is provided in this policy on the Authority's approach to sites of varying levels of archaeological importance, requiring that suitable assessment of such sites is provided and that regard is paid to the value of such sites, and they are only

developed if the impact is acceptable. Where such sites are permissible for development the policy requires that conditions are imposed requiring a programme of archaeological work to be undertaken prior to commencement of development.

Supplementary Planning Guidance

4.3.27 The LPA has also adopted a number of guidance documents which expand upon policy within the LDP and provide greater detail and guidance on the LPA's approach to the key considerations that they cover. However, presently some of these documents relate to the previous development plan, and as such the weight that can be placed upon them is reduced. The following SPG's are of relevance for this proposal:-

- Affordable Housing (2019);
- Housing Mix (2018);
- Open spaces in Residential Development (2019);
- Planning Obligations (2019);
- Maintaining and Creating Distinctive and Sustainable Communities (2019);
- Parking Standards (2008).

5.0 POLICY AND TECHNICAL ASSESSMENT

5.1 Introduction

5.1.1 Planning application decisions should be determined in accordance with the Development Plan, unless material considerations indicate otherwise, attaching appropriate weight to each in the overall planning balance.

5.1.2 The purpose of the assessment is to demonstrate the overall compliance of the Proposed Development in the context of key planning policy considerations. The assessment also allows for consideration of the benefits against any harm or policy tension and, ultimately, whether the overall planning balance weighs in favour of the Proposed Development.

5.1.3 The following issues are considered in the assessment:

- Principle
- Housing mix, need, & level of development
- Affordable housing
- Design & context
- Residential amenity & privacy
- Ecology
- Trees
- Drainage
- Access & Accessibility
- Sustainability
- Archaeology & heritage
- The Welsh Language
- Open space
- Planning Contributions

5.2 Principle

5.2.1 The proposal would utilise a site that is set adjacent to the development boundary and within the built form of Brynsiencyn (a local village within the JLDP) to accommodate a suitable development for the site and locality (in terms of both the

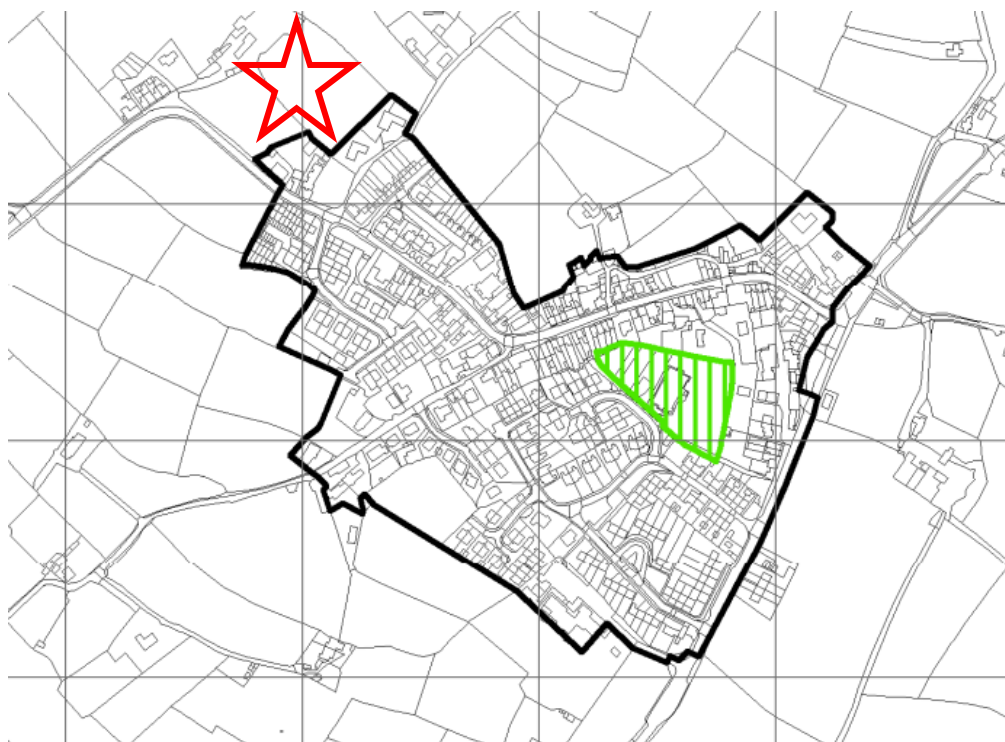


nature and the scale of the development proposed). The site is also accessible via non-car modes of transport and is well placed in terms of ease of access to the local services & facilities within the village and wider area. Finally, it also benefits from an extant planning permission that covers the majority of the site.

5.2.2 However, as the site is outside of the development boundary and proposes more dwellings than are included in the extant consent it is being advanced mainly as an exception site (i.e. an affordable site for which there is a proven need that cannot be met within the development boundary) for all additional dwellings above the open market dwellings allowed by the extant consent (i.e. for 21 affordable dwellings, with the remaining 9 to be open market per the extant consent). There is specific allowance for exception sites within National and Local Planning Policy.

5.2.3 As such, it is clear that this proposal will make a suitable use of this site that would entirely align with the requirements of the JLDP.

Figure 1 – Extract from JLDP Inset Map for Brynsiencyn, Site marked with a red star



5.2.4 Therefore, it is submitted that the scheme complies with the policy set out *in chapters 3 & 4 of PPW, and policies PS/5, PCYFF1, PCYFF2, PCYFF 3, PCYFF 4, & TAI6 of the JLDP* as the proposal is for a suitable type of development that

reflects the settlement strategy and strategic approach to the housing land supply set out within the JLDP.

- 5.2.5 It is noted that the Local Authority were of the same view in their response to Pre-Application Enquiry (PAE) and subsequent discussions **during the consideration of the preceding application.**

5.3 Affordable Housing Exception Site & Need for the development

- 5.3.1 As set out in the preceding section, the proposed approach is for the scheme to deliver entirely affordable housing for all new dwellings on the site as that element of the proposal is for an exception site, for which allowance is made by policy TAI6 of the JLDP, reflecting National Planning policy at para. 4.2.34 of PPW and in TAN2. For the open market element this will be 9 dwellings, which matches the number allowed by the extant planning permission, so there would be no increase in open market housing delivered on the Site.
- 5.3.2 The requirements for exception sites are that the scheme meets a proven need for that cannot be delivered within a reasonable timescale inside the development boundary, that the site is immediately adjacent to the development boundary, and that it is a suitable size for the host community.
- 5.3.3 **Need** – Per the Housing Need Assessment there are 4 households on the Social Housing Register for the local Parish, and 15 households on the Tai Teg Register for Brynsiencyn, giving a total housing need of 19 households. Clearly then there is a clear local need for affordable housing.
- 5.3.4 **Landbank & potential to meet need within settlement boundary** – Based on available detail on the LPA's register the following consents have been granted and are un-built that could assist in meeting registered housing need:-

Table 1 – Consented schemes in 'landbank'

Ref	Date Consented.	Site name	No dwellings	No. affordables	Notes
FPL/2021/218	09/12/2021	Tyn Pwll, Brynsiencyn	1	0	
Total dwellings			1	0	Total affordable dwellings

- 5.3.5 The extant permission on this site is excluded as its contribution is nominal (4 affordable units), and it would be replaced by this scheme if approved so its contribution can be set aside.
- 5.3.6 Clearly the available consented supply of dwellings is insufficient to meet registered need, leaving the needs of 19 households unmet.
- 5.3.7 There are no allocated sites that might otherwise meet that need, and having examined the settlement's development boundary opportunities for windfall sites are very limited comprising a limited number of sites that could accommodate single dwellings, with single dwelling proposals not required to provide affordable dwellings. Thus, there is no potential to meet the need through new scheme coming forward within the boundary.
- 5.3.8 **Houses for sale** – Only a small number of properties are available on the market and these are generally far in excess of an affordable value, with only 5 properties available for £175,000 or less, and with most of these being older properties or lacking in facilities such as off-road parking or garden space. This affordability issue is clearly evidenced by the considerable recorded need.
- 5.3.9 **Immediately adjacent to the boundary** – That is certainly the case as the site abuts the boundary on its south-eastern edge, and other development linked to the village on its north-western side. Thus, it would be clearly perceived as part of the settlement. Its suitability for development is helpfully demonstrated by the extant consent for housing on much of the site.
- 5.3.10 **Scale of the proposal in relation to the size and role of the settlement** – The level of development proposed is in keeping with a settlement of this size as it would not be so large as to substantially exceed the acceptable growth limits of the village. It would also have a good physical relationship with the village. In any case, Policy TAI 16 does allow for larger exception sites where the need has been established, and it is submitted that this is the case here as there is a considerable level of unmet need that cannot be met within a reasonable timeframe within the village.
- 5.3.11 There is also of course a trade-off to be made against the extant consent and the growth allowed by that, which would result in a similar level of development but with a much lower level of affordable housing to meet local need.



- 5.3.12 Overall, it has been shown in the housing mix report that there is a clear need for affordable housing in the settlement, and that the need reflects the number of houses proposed on the site and the level of affordable housing that will be delivered by other allocated or consented sites. As such, there is a clear demand and need for the dwellings proposed, and it is entirely reasonable to assume that they will be taken up by those on the housing need registers for the area, and thus it is appropriate to release this site set adjacent to the built form of the village.
- 5.3.13 Again, it is important to highlight that the Applicant enjoys a fallback afforded by an extant consent for 13 dwellings, of which only 4 must be affordable. This is highly relevant as if this proposal is not approved the Applicant can and would build that scheme, with the 9 dwellings not subject to affordable housing restrictions being predominantly large and thus not meeting local needs for affordable housing. Thus, there is a substantial planning gain for the local community that would be delivered by this proposal if it is approved by providing an additional 17 affordable dwellings over the extant permission, all of which will serve proven local need, and the provision of smaller and lower cost open market dwellings that are better suited to local need and that would be owned and provided by the partner Housing Association to meet local needs.
- 5.3.14 Helpfully, a recent appeal decision for a site in Gwalchmai¹ provides useful guidance on this topic, with para's 8-19 being particularly helpful on the matter of need, delivery via other means, reasonable extension, and local connection. As can be seen, this proposal accords with the approach taken by the Inspector on that case, and so this proposal must be equally acceptable as that case. In addition, that scheme did not benefit from the fallback permission that exists at this site which further adds to the considerations in favour of the proposal.

¹ Site:- Land adjacent to Crown Street, Gwalchmai Uchaf, LL65 4RT – PEDW case ref:- CAS-02892-R3Q9P5 – LPA Case Ref:- FPL/2022/256



5.4 Housing mix, need, & level of development

- 5.4.1 Policy TAI 8 looks at Housing Mix, and in this instance the mix has been prepared in consultation with Clwyd Alyn housing association to determine what the local market and 'need' is in the locality at the present time.
- 5.4.2 In this case, the application is being presented as a tenure neutral scheme, meaning that the Applicant is happy to agree to the required 100% affordable housing provision for relevant part of the site, but that it is proposed that the precise tenure of the dwellings will be left open in order to allow tenures to change over the development's life as needs change over time. That being said, the scheme is being developed and is designed as an entirely affordable housing development to meet identified local need, and the intention of the ultimate owner - Clwyd Alyn - is that the scheme will be provided as entirely affordable housing with the majority being social rented homes, meeting the objectives of the WG set target of delivering 20,000 new low carbon homes for social rent during this five year Senedd term to 2026. There will be the opportunity to review a mix of tenures on the site (e.g. social rent, intermediate affordable rent, shared ownership, & intermediate affordable housing for sale) to meet need as it comes forward. This meets the aims and objectives of Isle of Anglesey County councils housing strategy to *"build homes in communities with our key Housing Partners, this includes working with rural communities to understand the real housing need within the communities. Housing Services and its key Housing Partners will build social rented properties, intermediate rent, self build and assistance to first time buyers as well as introduce a Shared Equity Policy."* This approach allows some flexibility to Clwyd Alyn that the scheme can change to meet differing needs (if consented) once built, rather than being fixed at a particular tenure mix now that may not meet the future needs of the community.
- 5.4.3 The mix of dwelling types proposed would meet a wide range of affordable housing need identified for the settlement, with a mix of property types and sizes provided to accommodate single people all the way up to large families.
- 5.4.4 It should also be noted that as the scheme is largely for an exception site proposal policy requires that the relevant dwellings approved under that policy are subject to Section 106 Planning Obligation that will control their occupancy, tenure, & value in perpetuity such that may only be used as affordable housing, and with controls such



that they meet local need². This would comply with the requirements of relevant policy.

5.4.5 Helpfully, the recent appeal decision for a site in Gwalchmai also provides useful guidance on this topic, with para's 17-19 being particularly helpful on the matter of tenure, local connection, and Planning Obligations. As can be seen, this proposal again accords with the approach taken by the Inspector on that case, and so must be equally acceptable.

5.4.6 In this case the following mix of dwelling sizes and tenures is proposed:-

5.4.7 The following mix is proposed:-

Table 2 – Proposed Mix Detail

Unit type	No.	Type of dwelling	Bedroom no. per unit	Tenure
1-bedroom 2-person apartment	1	Apartment	1	Tenure neutral
1-bedroom 2-person apartment – Open market	7	Apartment	1	Open market
2-bedroom 4-person house	11	Semi-detached two-storey house	2	Tenure neutral
2-bedroom 4-person house – Open market	2	Semi-detached two-storey house	2	Open market
3-bedroom 5-person house	5	Semi-detached two-storey house	3	Tenure neutral
4-bedroom 7-person house	2	Semi-detached two-storey house	4	Tenure neutral
Total no. dwellings	28	Total no. bed spaces	57	

5.4.8 The submitted Housing Mix Assessment provides a detailed assessment of the proposed mix, current supply, likely demand (inclusive of detail of need recorded in relevant data sources), and then assesses the proposed mix against that information and the County level expectations of the Local Housing Market Assessment. It is

² The relevant JLDP policy and accompanying SPG requires that for dwellings on an exception site that occupiers have a 5-year connection with the village. Though TAN 2 requires that all Planning Obligations include a cascading mechanism to ensure that occupants are always found for rural exception sites when a house is vacant. It is intended that this type of cascading approach would be taken here, with the first priority being for 'applicants who have lived or worked in the local ward for a continuous 5-year period at the time of their application', and then the tiers thereafter having differing degrees of connection with the settlements and locality. It is proposed that the cascade would be agreed as part of production of the S106 to accompany any consent.

concluded that the affordable element of the proposal meets local need when assessed against available evidence in the form of the social housing register and Tai Teg Register. Importantly it would not exceed total combined need on the Social Housing and Tai Teg registers. The proposed open market element also accords with strategy seeking provision of dwellings suited to meeting the need for smaller households, which form a growing part of the population, and is also beneficial in providing lower cost homes (especially in comparison to the extant permission).

5.4.9 As such, it is considered that the proposal responds well to the Site and local needs, and indeed has been explicitly designed around them, and would provide a valuable opportunity to deliver a mixed tenure affordable housing led development on a highly accessible site in a key settlement, and so meet the need for affordable dwellings in the area.

5.4.10 The development therefore complies with the approach set out in ***PPW and JLDP policy TA18, as well as the current SPG on housing mix***, as it will clearly meet local needs.

5.4.11 Turning to the question of ***the growth level identified for the settlement***, policy TA12 identifies the following growth for Nefyn:-

Table 3 – Identified allocations and indicative growth level for Brynsiencyn

Allocations	Indicative windfall growth provision	Total
0	29 (inclusive of 10% slippage allowance)	29

5.4.12 Based on consented schemes since the plan adoption date (20 units) the proposal would exceed the indicative growth level of the settlement by 19 dwellings.

5.4.13 However, it is submitted that this exceedance is justified owing to the detail shown in the Housing Need Report, which clearly demonstrates that based on available housing need data that there is a considerable need for affordable properties in the locality that this proposal would meet.

5.4.14 As such, it is submitted that there is a sound and reasoned basis for approving this scheme and exceeding the indicative growth level set in the plan. Indeed, there would appear to be a basis for releasing other land in and around the settlement to



meet this type of need, but this falls outside the scope of this submission and document.

- 5.4.15 Turning to the question of scheme density it is noted that the density of the site falls marginally short of the 26.7dph sought in the JLDP (28 dwellings on a 1.05ha site). This is only very marginally under the density sought by the LDP, and clearly the need to accommodate open space, SuDS features, and other infrastructure such as the access road and turning heads justifies a very slight reduction in density per the proposal. It is also considered that the proposed layout, separation, and design of the dwellings is suited to the site and locality. As such, it is submitted that the proposal complies with **policies PCYFF2 & TAI8 of the JLDP** which allow for some variance from target densities where this is justified.

5.5 Design & context

- 5.5.1 When assessing design, the initial process seeks out the context of the site and surroundings. The site lies in the north-western extent of the village, with development adjoining its north-western and south-eastern sides, and the main road through the village (the A4080) on its south-western edge, with the result that it is clearly set within the built form of the village.
- 5.5.2 Full detail of the design approach adopted for the scheme is provided in the detailed **Design & Access Statement** provided as part of the submission, which includes a context appraisal, design vision, and details of the approach to matters such as accessibility, sustainability, and community safety. Thus, that detail will not be repeated in full here.
- 5.5.3 Briefly though, it is clear from that document & the submitted plans that the scheme represents a considered approach to the site and its context. The proposal adopts a traditional scale, form, and general design, but is of its time in terms of the design approach and materials used in the scheme. The result is a successful design for the proposed properties that will be suited to the site and context and will be of a high quality.
- 5.5.4 This approach also extends to the street design, with a 'standard estate road' providing the core access route within the site, with parking set off this, and areas of landscaping set within the centre of the site and more substantially around its exterior



sides & in particular on its northern boundaries. The public open space is then woven into and through the open space on the northern boundaries, providing a high quality and 'natural' experience for its users. This approach provides a buffer to adjoining properties and also reflects the transition out of the settlement on the north-eastern & north-western boundaries. The parking approach has been designed to avoid dominance of the street scene by parked vehicles (whilst still generally complying with the LA's required parking standards) with parking carefully placed and extensive landscaping used to soften the effect.

- 5.5.5 Finally, a detailed **hard and soft landscaping design** has also been provided as part of this submission, with the proposed scheme designed to ensure that the Site is landscaped to a high standard and thereby integrates successfully into its setting. The scheme also offers ecology benefits, per recommendations in the relevant report, and has been integrated into the surface water drainage design..
- 5.5.6 Overall, what is being proposed is a high-quality scheme of a good standard of design that reflects the pattern of adjoining development and would provide a well-designed space that will be pleasant and enjoyable for its occupiers. As such the proposal complies with the guidance on design set out within **Chapter 3, section 4.2 of PPW, TAN12, and policies and policies PCYFF2, PCYFF3, & PCYFF4, PS19, & AMG3 of the JLDP and SPG – Design in the Urban and Rural Environment.**
- 5.5.7 It is noted that the LPA raised no concerns with the indicative design in their PAE response, and during consideration of the previous application, and as such it is assumed that this will continue to be the case with the final scheme design.

5.6 Residential amenity & privacy

- 5.6.1 The submitted design would respect the amenities enjoyed by the occupiers of neighbouring properties as the proposal is set at a suitable distance from them and would be of an appropriate height and form to ensure that it would not have an overbearing impact upon the neighbouring dwellings.
- 5.6.2 In particular, care has been taken in the design of properties 11 - 18 to ensure that their design respects the privacy and amenity of the occupiers of the adjoining property known as Wenllys, Llefior and Bryn Garth, as they are the closest properties to the site. The degree of separation, intervening boundary treatments and



- landscaping, and careful placement of windows and design approach ensures that the scheme would not intrude upon their privacy or amenity.
- 5.6.3 For Twn Cwrt and Llwyn Ysgaw, there is also a good degree of separation, and that coupled with the intervening boundary treatments and planting would, along with the careful design approach, ensure no harm to privacy or amenity from the proposal.
- 5.6.4 Activity on the site would be fairly limited and low-key due to the nature of the use and would not be harmful to neighbours due to the level of separation involved and the existing developed character of the area. Similarly, movement of vehicles along the site access would have a limited and entirely acceptable impact upon neighbours due to the relatively modest number of movements involved, current levels of vehicle movements in the area, and the acceptable degree of separation between the access and neighbouring properties.
- 5.6.5 Notwithstanding the above, the site also benefits from an extant permission that would have a similar impact upon neighbours and the locality, and as such the difference between the proposal and the fallback is modest and certainly would not be so substantial as to be materially harmful.
- 5.6.6 A suitable level of amenity space will be provided for each of the proposed dwellings, with sufficient space provided around them to meet their occupants' needs. Similarly, a good level of separation would be provided between the proposed dwellings to ensure that their occupiers enjoy a good standard of privacy and amenity, and this again has been designed to comply with the relevant LPA guidance. The scheme also includes carefully designed and integrated open space provision, which has been woven into the landscape design and would provide a significant amenity benefit for both the schemes occupiers and other local residents.
- 5.6.7 As such, the proposal will comply with **sections 3 & 4 of PPW, and policies and policies PCYFF2, PCYFF 3, & PCYFF 4 of the JLDP** as the proposal has been suitably positioned and designed to respect and protect the amenities & privacy of the occupiers of neighbouring properties and to provide a good standard to its own occupiers.
- 5.6.8 Turning to any construction impact from the proposal (in the event that it is proposed) this would be modest and limited in duration, and must also be viewed in the context



of extant consent on the site. In accordance with best practice the Applicant has provided a Construction Management Plan (CMP), which includes detail of measures to ensure that the site is properly managed and that material harm to neighbours' amenity and the locality is avoided. This is entirely suitable for approval as part of this consent, and if so then it could be stipulated that it must be followed under a condition upon any approval. Should the Authority consider that amendments or additions are required to the CMP then the Applicant would be happy to enter into discussions with a view to agreeing on suitable changes. Imposition of **construction operating hours** may also be needed in this case, and if so then it is submitted model condition 65 of the same circular should be used and that 08:00-18:00 Monday to Friday, and 09:00-17:00 on Saturdays would be appropriate hours for this Site.

5.7 Ecology

5.7.1 A Preliminary Ecological Appraisal report and Green Infrastructure Statement has been provided by Enfys Ecology, which includes survey results. The report has been submitted with the application and should be read in full, but in brief it confirms that:-

- i) **Records search** – There are no protected or designated habitats within or significantly close to the site. There are also no records of protected or notable species on the site, but there are some records of a variety of species in close proximity to the site;
- ii) **Protected species** – Importantly the report confirms that no protected species or signs of their presence were found within the site. The following points are noted following on from this;
- iii) **Amphibians & Great Crested Newts** – The site itself provides suitable habitat for amphibians for foraging and commuting, with no ponds on the site itself but some in the area. So, common amphibians may be present on site. For GCN, these are not known to be in local ponds but their presence could not be entirely discounted even though it is unlikely. Therefore, ponds around the site were surveyed and either found to be unsuitable, or where they were possibly suitable then they were tested and found not to contain newts. As there are no records of GCN locally it is therefore clear that they are unlikely to be present. As such, the report simply recommends Reasonable Avoidance Measures (RAMS) and mitigation steps. The recommended measures have where possible been

incorporated onto the plans, with the remainder suitable for imposition through conditions upon any permission;

- iv) **Badgers** – Badgers were not found on the site though it has some potential as suitable foraging habitat. As a result, no mitigation is required, and only RAMS in case a badger enters the site during works (suitable for control via a condition upon any consent);
- v) **Reptiles** – The site has some good quality habitat, but most of the site is not very suitable for reptiles. The grassland and rubble piles are picked out as features of potential value. Accordingly, the site was surveyed to confirm their presence or absence, and no reptiles were found. This is likely due to the fact that the site has only been suitable for them for a short period. The report therefore recommends a set of mitigation measures to avoid construction impacts and compensate for lost habitat. These include recommendations for RAMS, and for site clearance (with sufficient detail provided to allow this matter to be conditioned for later approval), preparation of receptor areas within the site in advance of clearance, and the retention of habitat on site (in the landscaped/ecology mitigation areas integrated into the scheme). Again, it is considered that this will address any potential impact, and it is submitted that it would be appropriate to condition these measures as part of any permission;
- vi) **Bats** – The site provides good quality habitat for foraging and commuting within the small woodland, and with the site having good connectivity. The large trees to the north have potential features of value, but these would not be impacted by the proposal. Selected trees on the north-western edge of the site have foraging potential, and the mature trees on the northern corner have roosting potential. No bats have been recorded on the site, though there are records locally. The trees will be retained as part of the proposal, therefore RAMS are proposed as are mitigation & enhancement measures for inclusion as part of the development, including provision of bat boxes as part of the landscaping scheme, plus recommendations in respect of lighting. Where possible these are incorporated into the submitted plans and documents, with the remainder suitable for imposition through conditions upon any permission;
- vii) **Birds** – The entire site has potential to host nesting birds and provides some foraging habitat, though its value to schedule 1 species is limited. As such, RAMS are proposed, as are mitigation & enhancement measures for inclusion as part of the development - including provision of bird boxes as part of the landscaping scheme.

Where possible these are incorporated onto the plans, with the remainder suitable for imposition through conditions upon any permission. Timing controls for removal of vegetation/trees are also set out;

- viii) **Other protected & non-protected species** – No other protected species were found to be present. The potential for impact upon non-protected species is noted, and general RAMs are set out to avoid such effects, together with steps to retain value in the site for species such as hedgehogs;
- ix) **Habitat** – The site contains a mix of habitats comprising mainly semi-imposed grassland and scrub, with areas of mixed woodland, ruderal vegetation, hardstanding, and other small areas of habitat. The habitat assemblage is not rare or notable, and as such the report concludes that suitable mitigation and enhancement can be provided through a detailed landscaping scheme, with its recommendations carried through into the submitted design. The report also recommends that an on-going management plan is created for the habitat/features within the site, this is capable of control via condition upon any consent;
- x) **Invasive Non-Native Species** – *Cotoneaster Horizontalis* was present in the western part of the site near the boundary hedge. No other INNS were recorded on the site. It is submitted that a condition can be used to tackle the INNS and ensure that they are eradicated from the site, with detail of the approach to the same provided in the Construction Management Plan;
- xi) **Green Infrastructure** – The submitted GIS confirms that the site does provide habitat of value to some species but the habitats on the site are not rare or notable. Whilst there would be some habitat loss this has been minimised and directed to lower value habitats, and avoidance measures specified to reduce these impacts that will occur. For the habitat losses arising from the proposal, mitigation will be provided through the landscaping scheme and replanting proposed as part of the scheme, which will also provide enhancement through the carefully structured planting scheme that is proposed (with the scheme improving diversity and value over the current habitat assemblage on the site, and integrate with the features of higher value that already exist and will be retained as part of the scheme), along with the creation of blue infrastructure as part of the drainage scheme. It is also confirmed that compensation & enhancement will be provided through bat & bird boxes and other similar measures. As such, it is clear that the scheme will deliver biodiversity &

ecosystem resilience and net benefit. The report also notes the benefits of the schemes approach to access and wealth and well-being, which has been carefully integrated into the landscape design, and will be a significant benefit to the area and those living on the site.

5.7.2 Overall, the measures set out in the report would protect the favourable conservation status of the species present on the site, and would address the requirement for ecological enhancement & mitigation. These should be secured through a suitably worded condition/s upon any permission. As such, the proposal complies with the guidance within **section 6.2 and para's 6.4.1-36 of PPW & TAN 5, and with the requirement of policies PCYFF2, PCYFF 3, & AMG 5 of the JLDP.**

5.7.3 The proposal presented here reflects the approach agreed on this topic during the previous application so it is assumed that the approach taken is likely to be satisfactory.

5.8 Trees

5.8.1 In respect of trees, as the site is set within influencing distance of a number of trees a detailed arboricultural survey was commissioned from West Coast Arboriculture & Land Planning Limited, with their advice influencing the scheme design. The resulting reports and plans are included as part of this application. That report should be read in full but in brief it demonstrates that:-

- i) Trees T1, T2, T3, T5, T15 & T16 either require removal regardless of the development or are of low value and thus should not form a barrier to the proposal. Similarly, tree groups G1, G2, G3, G4, G6, G8, G9 & G11 must be removed to allow development but these are of low value and thus should not form a barrier to development. Indeed, the report highlights that the trees of consequence are set around the site periphery and not within the 'core' of the land;
- ii) Trees T4, T6-T14, & T17-T19 and groups G5, G7, G10, G12 will be retained and safeguarded as part of the development;
- iii) The report and accompanying plans set out detailed measures to safeguard the retained trees during and following development. This scheme is detailed and is



suitable for approval as part of this application and then imposition through conditions as part of any consent;

- iv) More than sufficient mitigation in the form of new planting is provided as part of the proposal to compensate for the removal of trees from the site.

5.8.2 As such, the proposal complies with the guidance within **para's 6.4.37-44 of PPW and TAN10, and with the requirement of policies PCYFF4, PS19, & AMG/3 of the JLDP** as account has been taken of the trees within and around the site and suitable steps proposed to ensure that they will be retained and protected where they are of sufficient quality and value. Where removals are required, these are justified and compensatory planting is proposed. Sufficient detail has been provided such that no further approvals are required, and the report and its requirements should be required to be followed under an adapted version of conditions 118 or 119 of WGC 016/2014.

5.8.3 It should also be noted that the extant scheme would have involved similar or greater impacts to many of the trees and does not include as extensive a scheme of mitigation and enhancement as this proposal. This weighs in favour of the proposal.

5.8.4 In addition, no concerns were raised with the approach to trees during consideration of the previous application, so it is assumed that this will continue to be the case for this application.

5.9 Drainage

5.9.1 A Drainage Report inclusive of a preliminary foul & surface water drainage layout has been prepared by Datrys and has been included as part of the submission. The submission sets out the drainage approach for the scheme, and concludes that:-

- i) **Foul Drainage** – The proposal will connect to the main sewer set to the south of the site in the highway site. A Developer Enquiry to DCWW has been made and this confirmed that this arrangement is suitable and that there is sufficient capacity to accommodate the proposal in the drainage network and treatment plant for the area;
- ii) **Surface Water Drainage** – A proposed drainage approach is set out that addresses the potential for disposal of surface water to soakaways or other SUDS compliant solutions on the site. It is concluded that soakaways are feasible

in this case. As such, it is proposed that surface water will be managed within the site through soakaways for the properties which will be complemented by rain gardens and water butts, and raingardens and soakaways (plus the infrastructure and pipework leading into them) to manage highways drainage. Use of permeable pavements is also proposed. The scheme has been designed to account for a 1 in 100 storm and climate change. This approach reflects the SuDS hierarchy and would ensure that this site is suitably drained. It is anticipated that a SAB pre-app advice will be sought concurrently with the planning application, allowing for any required adjustments to be made as part of the application. An application for SAB consent would then follow on from any planning approval.

5.9.2 It is noted that Dŵr Cymru Welsh Water were satisfied with the proposal during consideration of the previous application, thus confirming that there are no issues with foul drainage.

5.9.3 As such, the proposal will comply with **sections 6.6.17-6.6.21 of PPW and policies DP/3, NTE/8 and NTE/9 of the JLDP**. It is submitted that sufficient detail is provided to determine this application, and that model conditions no's 38 & 39 of WGC 016/2014 are suitable for controlling final detail of the foul and surface water drainage schemes, with further regulatory control provided through the SAB consent process and legislation related to foul drainage.

5.10 Access & accessibility

5.10.1 In respect of **vehicular access**, the scheme will be served by an existing access onto the A4080³. The access provides a good standard of visibility for vehicles and cyclists entering and emerging from the site. The proposed entrance will also provide a suitable **pedestrian access** from the site onto the existing footway that adjoins the site, and this together with the pedestrian footpath that runs into the very northernmost part of the site means that the site is well served for access by pedestrians. As such, it will be readily accessible by those on foot.

³ This was built as part of work to implement the previous consent on the site and is of a good standard.



5.10.2 As the proposal is a major development (albeit a fairly small one) a Transport Statement (TS) has been produced for the scheme by SCP which assesses the highways and accessibility aspects of the scheme. Again, input from SCP has influenced the design of the scheme.

5.10.3 Again, it is not considered necessary or desirable to repeat the analysis set out in the Transport Statement here, but in brief it concludes that:-

- i) **Existing conditions (2)** – These are addressed in section 2 of the report and the site is shown to be well served by existing infrastructure, with no evidence of safety problems in the locality and a good standard of visibility onto the A4080;
- ii) **Proposed development (3)** – The report then assesses the scheme itself and demonstrates that the site access would be suitable and safe, that the internal roads are well laid out and can accommodate all traffic (with the accompanying plans demonstrating this through visibility splay detail and swept path drawings);
- iii) Section 3 also examines parking (3.7-3.8) which is shown to generally comply with the Council's maximum standards set out in the SPG Parking Standards (2014), with only a small reduction below the standard for the 3 and 4-bed properties. However, this is entirely suitable bearing in mind the accessibility of the site, national and local policy, general car ownership levels, and the reasonable expectation that car ownership levels will be lower on this affordable led scheme (with this accepted by the Highway Authority in their PAC response);
- iv) **Accessibility (4)** – This section comprehensively assesses the accessibility of the site via non-car modes of transport, with the site shown to have a good level of accessibility for pedestrians, cyclists, and for access by public transport, with all required day to day facilities reachable via non-car modes, and regional and National destinations readily accessible via rail;
- v) **Anticipated transport impact (5)** – This section examines the scheme in light of the extant permission, and demonstrates that expected additional vehicle movements from the development are low (a net increase of 6 two-way movements in the weekday AM and PM peak hours, equating to one additional vehicle trip every 10 minutes) and the report states that *"the proposed development is not anticipated to result in a material intensification of the local highway network and no further detailed assessment is required. The traffic impact of the scheme is therefore acceptable in planning terms"* (5.7) (We would

also submit that from a 'planning perspective' this level of activity is not sufficient to have any material impact, and certainly not a materially harmful impact, upon neighbouring residents or property occupiers. This is especially so bearing in mind the nature of the area and the proposed design & siting of the access arrangements. It is noted that again the Highway Authority were satisfied with the proposal in this respect in their PAC response);

- vi) The report finishes by summing up the case and concludes that *"it is therefore considered that the application proposals are acceptable with regard to transport"*.

- 5.10.4 As such, it is submitted that the Technical Note & accompanying plans clearly demonstrate that the development will have a minimal and entirely acceptable impact upon the operation and safety of the highway, which has sufficient capacity to accommodate the development, and that suitable access arrangements are proposed for vehicles and cyclists. It is also clear that the Site can be provided with a suitable pedestrian access and is highly accessible via non-car modes.
- 5.10.5 Although not highlighted in the Technical Note, the scheme will also protect the line of a footpath where it passes through the site and link this into the development. This will improve accessibility for the scheme residents onto the local PRoW network, and also ensure that the current unmaintained section of the path within the site is actively managed, to the benefit of all users of the path.
- 5.10.6 As such, the proposal will comply with the requirements of **section 4.1 of PPW & TAN18 as well as policies PS4, TRA1, TRA2, TRA4, PS5, & PCYFF4 of the JLDP and together with SPG – Parking Standards**, as suitable access and parking arrangements are proposed, and the local transport network is suitable to serve the proposal in all respects.
- 5.10.7 It is noted that the HA were satisfied with the scheme during consideration of the previous application. As such, it is expected that the scheme will continue to be acceptable to the HA and thus also to the LPA.
- 5.10.8 Any **construction impact upon the highway** from the proposal will be modest and limited in duration, and there is more than sufficient space within the site to ensure that construction activity is fully self-contained. Therefore, no further detail should be required in this respect. However, in accordance with best practice the Applicant has



provided a Construction Management Plan (CMP) which includes detail of traffic management. This is entirely suitable for approval as part of this consent, and if so then it could be stipulated that it must be followed under a condition upon any approval. Should the Authority consider that amendments or additions are required to the CMP then the Applicant would be happy to enter into discussions with a view to agreeing on suitable changes.

- 5.10.9 In respect of access by persons with **disabilities or mobility impairments** the proposed development has been laid out to provide suitable clear access routes within the site to allow for movement within it by all potential users. Turning to the dwellings, the floor plans demonstrate that the buildings will be reasonably accessible subject to minor adaptations to allow use by particular users, such as modifications to the bathrooms, or the installation of a stair lift or full lift either of which would be achievable within the proposed designs. In addition, all properties include principal accommodation, a potentially adaptable WC or full bathroom, and in the case of the larger properties and the ground floor flats a bedroom on the ground floor, and thus would be accessible by design. As such, it is submitted that it is clear that the proposed dwellings will all be reasonably accessible and adaptable as per the approach set out in **para's 3.5-3.6 & 3.7-3.8 of PPW and TAN12, and in JLDP policies TRA4, PS5, PCYFF3, PCYFF4.**

5.11 Sustainability

- 5.11.1 In respect of **access via non-car modes of transport**, the proposal is situated within walking distance of the day-to-day facilities available within the village itself (a primary school, a local shop, a post office, recreation space, a pub, a takeaway) and within cycling distance of the wider range of facilities available in Llanfair PG, Gaerwen, and Newborough. A regular bus service also serves the village and allows access to key destinations such as Llangefni, Bangor, as well as several other villages. There is also a mainline railway station in Llanfair PG (easily reachable by bike or bus) allowing public transport access to the wider region and nation. As such, the proposal is set in an accessible location and therefore has the potential to foster the adoption of non-car modes of transport by its occupiers.



- 5.11.2 The proposal therefore complies with the objectives set out in **para's 3.6, 3.12-3.13, and 4.1.35-4.1.38 of PPW, and in policies PS/4, TRA1, TRA4, PS5, PCYFF3 of the JLDP.**
- 5.11.3 Turning to the question of **energy use and built sustainability**, it is intended that the proposed dwellings would be designed to reduce their energy consumption through high levels of insulation, and the specification of energy efficient technology and fittings, as well as appliances and fittings that would reduce the use of water. In addition, the construction approach in this case is based upon Modern Methods of Construction with a locally built timber frame construction, which itself will lower emissions and impact from the construction stage of the development. As such, environmental impacts of the proposal will be minimised. This will address the requirements of **para's 3.7-3.8 & section 5.8 of PPW, TAN12, and policies PS5, PS6, PCYFF3, & PCYFF5 of the JLDP.**
- 5.11.4 A **Water Conservation Strategy** has been provided as part of the scheme which demonstrates that suitable measures can be incorporated into any future detailed design to reduce water usage. As such, the proposal complies with the requirements of **section 6.6 of PPW and policy PCYFF6 (as well as PS5, & PS6) of the JLDP.**

5.12 The Welsh Language

- 5.12.1 A Community and Linguistic Impact Assessment has been provided to assess the possible impact of the development on the Welsh Language in the community. The assessment should be read separately to allow a full assessment of the proposal but in brief it concludes that the scheme will have a modest impact and is unlikely to result in any harm due to its suitable scale in terms of the resident local population and the clear targeting of the scheme at identified local need for affordable housing.
- 5.12.2 Indeed, it is submitted that the proposal is likely to be beneficial as it would provide dwellings suited for use by a range of local residents, with the proposal clearly targeted at meeting the substantial un-met need in the locality. This will allow local people in housing need to establish long term homes in their community. This will ensure that the development provides a long-term asset for the community in meeting affordable housing need. This would assist in addressing the issue with housing affordability in this community, and thus will be an important component in retaining Welsh users in this community and in particular the young who are of



course vital to the future of the language and the most likely to require assistance in accessing housing.

- 5.12.3 Per the detail earlier in this Statement, any permission would be subject to a S.106 Planning Obligation, which would include measures to ensure that the dwellings are retained as affordable homes in perpetuity, and also to favour those with local connections. Bearing in mind the latter control, it is reasonable to expect that occupiers would reflect the Linguistic profile of the community, and even on the occasions where the occupancy cascade is applied this would extend outward from the site into areas that also have reasonably high proportion of Welsh speakers. Thus, it is reasonable to conclude that the scheme would be beneficial to the Welsh Language as it would provide much needed affordable housing to meet an identified local need for the same, and it would provide a long-term supply of such housing to the locality that would assist in meeting the community's future need for affordable dwellings.
- 5.12.4 Thus, there is a very modest risk of non-Welsh speakers being resident in the scheme, though these people are likely to already be resident in the area bearing in mind the high level of local need.
- 5.12.5 A set of mitigation measures are proposed in that document, and those would provide a proportionate and sufficient response to mitigate the modest risks/impacts identified and ensure that the scheme results only in positive impacts for the Welsh Language and its use in this community.
- 5.12.6 Those measures could be controlled by way of a condition upon any permission requiring that the measures set out in the CLIA are followed. As per the requirements of policy PS1 of the JLDP the Applicant is also happy to agree to a condition requiring the use of bilingual signage and the retention and use of Welsh names within the development.
- 5.12.7 As such, the proposal complies with ***para's 3.25-29 of PPW and TAN20, and the requirements of policy PS1 (& PS5) of the JLDP and SPG – Maintaining and Creating Distinctive and Sustainable Communities*** as it is clear that the potential impacts of the development have been assessed and that the scheme will not result in any material harm to character and linguistic balance of the local community, and

in addition mitigation would assist in addressing the residual impacts and ensuring a positive impact.

- 5.12.8 Again, the recent appeal decision for a site in Gwalchmai provides useful guidance on this topic, with para's 20-30 being particularly helpful on the matter of the Welsh Language, community cohesion, and social fabric. As can be seen, this proposal again accords with the approach taken by the Inspector on that case, and so must be equally acceptable. In addition, that scheme did not benefit from the fallback permission that exists at this site which further adds to the considerations in favour of the proposal.

5.13 Open space

- 5.13.1 As the proposal is for more than 9 dwellings policy ISA 5 seeks provision of open space as part of the development "where existing open space cannot meet the needs of the proposed housing development". This point was raised with the LPA in the PAE with clarification sought as to the current level of supply within the locality (in accordance with the SPG Open Space). It was confirmed in that response that a contribution toward outdoor sport would not be required as the site is not "within a major residential area", and that the current supply of equipped children's play space exceeds requirements for the village's current population and the proposal. As a result, the only requirement would be for children's informal play space.

- 5.13.2 The following tables provide calculations of expected open space on-site as part of this development:-

Table 4 – Required children's informal play space

A. Number of Bedrooms	B. Occupancy Assumption	C. Need per Unit (m2) B X 16	CH. Number of Units	Total Need (m2) (C X CH)
1	1.26	6.93	4	n/a
2	1.74	9.57	7	124.41
3	2.36	12.98	2	64.9
4	2.41	13.255	1	26.51
5 or more	3.04	16.72	0	0
Total			28	215.82
			Less oversupply	0
			Net total	215.82

- 5.13.3 Per the above, policy would seek a total of 215.82m² of children's informal play space on the scheme as existing supply in the area cannot meet the development's needs. Suitable space has been shown on plan with this interwoven into the landscaped areas to provide attractive and stimulating play provision as part of the scheme. As such, the proposal will comply with the requirements of policy ISA 5 of the JLDP & the SPG Open Spaces in New Residential Developments.

5.14 Archaeology

- 5.14.1 Gwynedd Archaeological Planning Services (GAPS) were consulted due to their role as archaeological advisor to the LPA. It was confirmed by GAPS that there is potential for features of archaeological value to be present on the site, and thus trial trenching has been recommended with this to be completed prior to determination.
- 5.14.2 As a result, an Archaeologist has been engaged to address the matter, and the results of the requested investigatory work is presented as part of the submission. The report should be read in full, but the trenching that has taken place has found no features of archaeological value, and the reports concludes that the investigations *"indicate an undisturbed landscape that has been utilised for agricultural purposes, possibly grazing."* It is anticipated that this matter can be resolved during consideration of the application.
- 5.14.3 Therefore, it is clear that the requirements of **para's 6.1.23-6.1.27 of PPW, TAN24, and PS20 & AT4 of the JLDP** have been fully addressed as a suitable approach has been proposed that would ensure that the potential for any features of value that exist in the site are adequately investigated & if required recorded.

5.15 Planning contributions

- 5.15.1 At this stage it would appear that the scheme would not be liable to make any other planning contribution. As such the proposal would comply with **policies PS2 & ISA 1 of the JLDP as well as the SPG on Planning Obligations** as no planning contributions are required.

5.16 Conclusion

- 5.16.1 Overall, the proposal would develop a site that benefits from an extant permission and that is outside the development boundary but within the built form of the village



to accommodate a suitable, attractive, and affordable led housing development that would be suited to its setting and the wider locality in terms of its scale, form, and design. The scheme would provide a mixed housing development that will assist in meeting the clear local need for affordable housing, and thus will make a valuable contribution toward meeting recognised levels of housing need in the locality. As a result, it would be a justified exception site with an element of open market housing retained from the extant scheme on the site. It would also make the best use of the site in terms of its density, balancing the requirement to achieve higher densities in accessible locations against the constraints of the site, open space requirements, and the need to respect the locality. Finally, it would have an acceptable impact upon residential and general amenities, the operation and safety of the highway, biodiversity, and all other acknowledged interests.

- 5.16.2 In light of the above, the planning balance clearly and heavily weighs in favour of approving this application.



6.0 CONCLUSIONS

6.1.1 The following conclusions can be drawn from the sections above:-

- The proposal would utilise a site set within the built form of the village and that is largely subject to an extant residential consent to accommodate a suitable affordable housing let development for the site and locality;
- Whilst the site is outside of the development boundary there is a clear need that cannot be met within the boundary, and this justifies an exception in this case per policy TAI6 of the JLDP. The retained open market element has also been adjusted to better meet local need for smaller and lower cost housing;
- The proposed mix would meet identified local housing needs, and is targeted at the recorded affordable housing need. Similarly, the level of development is appropriate bearing in mind the substantial un-met need for affordable dwellings in the locality and the site's current status;
- The submitted plans show that it would result in an attractive development that would respond well to its context and the character of development in the locality. It would also be landscaped to a high standard;
- The scheme would ensure that the amenity & privacy of neighbouring residents is not materially harmed, and would provide an acceptable standard of both for its own occupiers;
- The Ecological Report & Green Infrastructure Statement submitted with the application demonstrates that the development of the site is acceptable, subject to a suitable set of mitigation & enhancement measures being put in place. Those measures are achievable and could be secured by way of a condition/s upon any permission;
- Account has been taken of the trees within and around the site and suitable steps proposed to ensure that they will be retained and protected where they are of sufficient quality and value, and that suitable replacements are specified where removal is required and justified;
- The site can be satisfactorily drained, with suitable foul and surface water drainage arrangements proposed as part of the scheme;
- A suitable access is in place and the highway serving the site has adequate capacity to cater for the proposal. Pedestrian access has also been addressed with good arrangements proposed. Similarly, suitable off-road turning and

parking space has been proposed, with the level of parking reflecting policy requirements and the accessibility of the site. The site is also accessible via non-car modes of transport and as such is well placed to foster its adoption by its occupiers;

- The proposal is also highly sustainable from a built environment perspective, with a sustainable design & construction approach for the proposed dwellings being at the heart of the design;
- The Community & Impact Assessment submitted with the application demonstrates that the scheme would not result in negative impacts upon the linguistic and social character of the locality, and indeed that it would be likely to be beneficial through the provision of much needed affordable homes. Potential residual impacts can be addressed through the proposed mitigation measures, which are reasonable, proportionate, and deliverable;
- A suitable level of open space has been integrated into the scheme that will meet the needs arising from the development.

6.1.2 To conclude, the proposal would make use of a site that is set within the built form of the village (if not its boundary) for an affordable housing led development, rather than for the open market led development allowed by the extant consent. There is a clear need that justifies developing the site per the exception site policy within the LDP, providing much needed affordable dwellings suited to use by a range of local residents and helping to address the housing crisis in this part of the Island. The open market dwellings retained on the scheme have also been adjusted to better meet local needs for smaller and lower cost housing.

6.1.3 The submitted plans and DAS show that the scheme has been designed to a high standard and that it would form a suitable and attractive addition to the locality that would reflect the general pattern and form of development in the area, and which would sit well amongst the surrounding properties.

6.1.4 The transport report and plans demonstrate that a suitable access is in place and the proposed parking and turning areas would meet the proposal's needs, and that a good standard of pedestrian access would also be provided. The site is also accessible via non-car modes and thus there is good potential to foster its use by residents for day-to-day activities.



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- 6.1.5 Detailed technical documents have also been supplied in respect of drainage, ecology & biodiversity, community & linguistic impacts, and other matters, which should all be read in full, but which demonstrate that the proposal is entirely acceptable in all these regards.
- 6.1.6 As a result, the proposal is fully supported by all relevant national and local policy. Therefore, there should be no barrier to approval of this application, and it is respectfully requested that permission be granted.

