



Land at Incline Fields, Bangor, Gwynedd

Proposed Erection of up to 48 No. Dwellings and Associated Development

Planning Statement

Prepared for

Williams Homes (Bala) Ltd

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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 the erection of up to 48 dwellings and associated development on Land at Incline Fields (Cae Incline), Bangor, Gwynedd (hereafter referred to as the 'Site').
- 1.1.2 The planning application is submitted to Gwynedd Council ('GC').

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 located within, and on the eastern edge of, the existing built form of the city of Bangor, and is set adjacent to the A5 on its western side.
- 2.1.2 The Site measures c. 2.5ha, and is currently an open sloping field. It is allocated within the Anglesey and Gwynedd Joint Local Development Plan for housing (as allocation reference T4).
- 2.1.3 The Site is defined on its frontage/western side by a hedgerow, which separates the Site from the A5 which adjoins this boundary. The access into the Site and to the properties to the east is also located on this boundary. Opposite is Mynwent Newydd Cemetery and Bangor Crematorium, with the Maesgeirchen Estate beyond.
- 2.1.4 The eastern edge of the site is defined by a wall, vegetation, boundary treatments, and others features that separate the site from Incline Cottage, the Penrhyn Castle parkland. A section of the Penrhyn Slate Quarry Railroad Scheduled Monument runs along this boundary and falls partially within the Site. Nursery Cottage is also set a short distance beyond, with the majority of the land to the east defined by the parkland for Penrhyn Castle.
- 2.1.5 A wooded area defines the northern edge of the site, with the Afon Cegin River valley set below along with a former railway. The Glantreaeth housing estate is set a short distance to the north, though it is screened from the Site by the woodland between.
- 2.1.6 The Site is located within Zone 1 on the 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 water.
- 2.1.7 The Site is not covered by any international or national land-use designations. However, it is located just over 0.5km from the Menai Strait and Conwy Bay Special Area of Conservation, Traeth Lafan Site of Special Scientific Interest, Lafan Sands Special Protection Area, and Traeth Lafan Local Nature Reserve. It is also set near to a candidate and existing wildlife site, and a restored ancient woodland.



- 2.1.8 The Site also includes or adjoins the North West Wales Slate Landscapes UNESCO World Heritage Site and Penrhyn Slate Quarry Railroad Scheduled Monument (Marchioglan Incline Plane/Tramway), and abuts the Incline Cottage Grade II Listed Building (LB) and Penrhyn Castle Grade II* Listed Registered Historic Park & Garden (RHP&G). It is also set within the Dyffryn Ogwen Landscape of Outstanding Historic Interest (RHL).
- 2.1.9 Bangor provides a wide range of shops, services, and facilities as befits its role as a city and a sub-regional centre within the Local Development Plan area.
- 2.1.10 The closest bus stops directly adjoins the Site and provide numerous and regular services into Bangor's city centre and to other key settlements. Bangor also has a mainline railway station, allowing easy access to the wider region and Nation.
- 2.1.11 No public rights of way run through the Site. Lôn Las Ogwen is set directly to the north of the Site with this also forming part of the National Cycle Network.

2.2 Planning History

- 2.2.1 A review of GC's online planning register has revealed only one application on the Site, which was made under reference C20/1030/11/LL in 2020, and sought consent for 66 houses (13 of which would be affordable) and associated works. The application was withdrawn on the 13/03/2023.



3.0 THE PROPOSED DEVELOPMENT

3.1.1 The proposal is a full application for the residential development of the T4 allocated housing site with 48 no. dwellings together with associated development. The proposal includes the following development:-

- Erection of 48 no. dwellings (comprising 34 no. houses and 14 no. apartments), together with their associated garden areas.
- Formation of an improved pedestrian and vehicular access onto the A5, and of new internal access roads and associated parking areas, and of a pedestrian footway linkage to the bus stop set on the Site's western boundary;
- Provision of off-site improvements to the highway in the form of localised widening of footways on the A5 and improvements to the bus stop set adjacent to the Site.
- Creation of pedestrian access routes and linear informal open play space associated with the above.
- Soft & hard landscaping associated with the above.
- Installation of a foul and surface water drainage system to serve the development, inclusive of a pumping station.
- Other minor associated development as per the submitted plans & documents.

3.1.2 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 Town and Country Planning (Development Management Procedure) (Wales) Order 2012 [DMPWO] (as amended) requirements.

3.1.3 The scheme has also been subject of a pre-application enquiry (ref:- Y24/0770 – Dated:- 06/11/2024) and subsequent discussions with the LPA, and the advice given has been addressed in the production of the application. Details of that pre-application enquiry and any subsequent discussions will be examined where relevant in section 5 of this statement.



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. Section 70(2) of the Town and Country Planning Act 1990 requires that, in dealing with an application for planning permission, the local planning authority shall have regard to:

- (a) the provisions of the development plan, so far as material to the application;
- (b) any local finance considerations, so far as material to the application; and
- (c) any other material considerations.

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 national policies that are material considerations in the determination of this application (i.e. 70(2)(c) above):-

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 Para's 3.41-3.52 guide authorities to produce spatial strategies that support objectives of minimising travel and improving access by non-car modes of transport. In particular a balance is sought on locating various types of development in urban



and rural areas with an emphasis on placing major generators of travel demand within urban areas where they are accessible by non-car modes of transport.

- 4.2.10 The priority in favour of protecting the best and most versatile agricultural land (grade 1-3A) is set out in para's 3.58-3.59, with such land only to be developed where there is an overriding need for its use and previously developed or lower grade land is unviable, or has an environmental value & designation that outweighs the agricultural consideration. It also directs that where such land must be developed the lower grades of land must be used in preference to higher value areas.
- 4.2.11 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).
- 4.2.12 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.
- 4.2.13 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.
- 4.2.14 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.).



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- 4.2.15 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.
- 4.2.16 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.
- 4.2.17 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.
- 4.2.18 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).
- 4.2.19 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 Para. 6.1.7 identifies the importance that the planning system has in protecting, conserving and enhancing the significance 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.
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- 4.2.23 Para. 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 This priority is then reiterated in para. 6.1.9 which requires that *“any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place.”*
- 4.2.25 Para’s 6.1.10-13 set out the statutory requirement to preserve Listed Buildings and their curtilages, and where relevant their settings, and any features of special architectural or historic interest that they possess, with the aim of enhancing them where possible. Advice is given on how to achieve this, either by retaining or reinstating original uses where possible, and also being flexible with new uses that secure a buildings future. The requirement to justify proposals is set out, together with the need for a (proportionate) Heritage Impact Statement.
- 4.2.26 As per para’s 6.1.14-6.1.17 account must be taken of the general presumption that the character and appearance of the Conservation Area within which a site is set is preserved or enhanced in accordance with local and national planning policy.
- 4.2.27 The guidance in respect of historic parks and gardens at para. 6.1.18-19 is noted, with LPA’s required to take account of the value of such sites when developments have the potential to impact upon them or their settings, with suitable assessments required where appropriate.
- 4.2.28 The guidance in respect of historic landscapes at para. 6.1.20-21 is noted, with LPA’s required to take account of the value of such sites where developments have a more than local impact and/or are EIA, with suitable assessments required where appropriate.
- 4.2.29 Para. 6.1.22 highlights the value of World Heritage Sites and the importance of assessing the impacts of developments that directly affect WHS, or their setting/buffer zones.



- 4.2.30 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.
- 4.2.31 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.
- 4.2.32 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.
- 4.2.33 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.
- 4.2.34 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.

- 4.2.35 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*”.
- 4.2.36 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.
- 4.2.37 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.



- 4.2.38 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.
- 4.2.39 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.
- 4.2.40 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.
- 4.2.41 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.
- 4.2.42 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.
- 4.2.43 Para’s 6.4.18-34 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).



- 4.2.44 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 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.
- 4.2.45 Para's 6.4.35-6.4.36 set out guidance on how matters related to protected species and their habitat must be dealt with.
- 4.2.46 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.
- 4.2.47 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".
- 4.2.48 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.
- 4.2.49 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.
- 4.2.50 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”*.

- 4.2.51 Para. 6.4.43 addresses ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows, and confirms that they are an irreplaceable natural resource and that they must be afforded protection from development that would result in their loss or deterioration unless *“very exceptionally there are significant and clearly defined public benefits”* from a proposal.
- 4.2.52 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.
- 4.2.53 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.
- 4.2.54 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.
- 4.2.55 Section 6.7 of PPW sets out detailed guidance on matters related to air quality and soundscape including how to assess such issues, how to locate potentially polluting development, considering sensitive development, soundscape and compatible uses, and managing potential impacts through Construction Phases.

Technical Advice Notes (TANs)

TAN 2 – Planning and Affordable Housing - 2006

- 4.2.56 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



- 4.2.57 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

- 4.2.58 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 15 - Development, Flooding and Coastal Erosion - 2025

- 4.2.59 Section 7 of this TAN applies here as this sets out guidance on sustainable drainage and highlights the requirement for SAB consent for many developments. It also states that where planning applications are made independently of an application for SAB consent that a drainage statement will be expected as part of the application.

TAN 16 – Sport Recreation and Open Space (2009)

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

TAN 18 – Transport - 2007

- 4.2.61 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

- 4.2.62 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.

TAN 24 – The Historic Environment - 2017

- 4.2.63 TAN24 is directly relevant to this application as it sets out guidance on the following points:-

- 4.2.64 Para's 1.23-1.29 of sets out detail guidance on how to address proposals that may impact upon the setting of a historic asset, including what may constitute a setting,



and that where relevant that a HIS may be required by the LPA to provide a structured assessment of how a proposal impacts upon a setting of an asset. The aim of the process is to assess whether a proposal results in an enhancement, neutral, or damaging impact upon the setting.

- 4.2.65 Chapter 3 of the TAN sets out guidance on World Heritage Sites, highlighting their importance (as a key material consideration), the role of their settings and buffer zones (where these exist).
- 4.2.66 For sites that have the potential to contain Archaeological remains a detailed set of requirements are set out in Chapter 4 of the TAN.
- 4.2.67 Unsurprisingly the TAN includes a good deal of guidance on development concerning Listed Buildings. In this case there would be no direct impacts but there is a Listed Building nearby so its setting must be considered, with guidance in section 5 of the TAN.
- 4.2.68 Para's 7.6-7.7 expand upon the guidance in PPW on sites in registered historic landscapes, and within or adjacent to registered parks and gardens, and again emphasises that the information in the registers must be taken into account where developments are of a type to require an EIA and/or where they are sufficient scale to have a more than local impact.

4.3 Local Planning Policy

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

- 4.3.1 Section 70(2)(a) of the Town and Country Planning Act 1990 requires that, in determining applications for planning permission, the local planning authority shall have regard to the provision of the development plan, so far as material to the application. The JLDP is the adopted development plan for the area covering the application, and consequently the relevant policies of it have been identified below, and the Proposed Development is then assessed against them in the following section in order to determine whether the proposal accords with the provisions of it and therefore should be granted favourably.



- 4.3.2 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:-
- 4.3.3 **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.
- 4.3.4 **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.
- 4.3.5 **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.
- 4.3.6 **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.
- 4.3.7 **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.
- 4.3.8 **Policy TRA 2: Parking Standards** – Defines the LPA's parking standards for all modes of transport (by reference to a relevant SPG).
- 4.3.9 **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.



- 4.3.10 **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.
- 4.3.11 **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.
- 4.3.12 **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.
- 4.3.13 **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.
- 4.3.14 **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.
- 4.3.15 **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.
- 4.3.16 **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 1: Housing in Sub-Regional Centre & Urban Service Centres** – This policy sets out the housing strategy for the proposed site’s location, stating that housing development will be delivered through a mix of allocated and windfall sites, and setting out an indicative maximum provision of windfall sites within the settlement.
- 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 **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.
- 4.3.22 **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.
- 4.3.23 **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.
- 4.3.24 **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.

4.3.25 ***Policy AT 1: Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens*** – This policy states that development affecting the setting and/or significant views into or out of the areas listed must account for relevant appraisal/assessment documents for the designations, and be accompanied by a HIA where appropriate.

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 limited. 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);
- Planning for sustainable development (Gwynedd only);
- Housing development and educational provision (Gwynedd only);
- The Slate Landscape of Northwest Wales World Heritage Site (2021).



5.0 POLICY AND TECHNICAL ASSESSMENT

5.1 Introduction

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

5.1.2 The principle relevant to the determining whether a proposal is in accordance with the development plan has been established across many planning cases, most notably R v Rochdale Metropolitan Borough Council, ex parte Milne [2000] EWHC 650; and City of Edinburgh Council v Secretary of State for Scotland [1997] 1 W.L.R. 1447. The fact is that development plan policies can pull in different directions i.e. some policies may support a proposal, whilst others weigh against it. A decision maker is therefore required to assess a proposal against potentially competing policies and then decide whether in light of the whole plan the proposal does or does not accord with it. This is not a mathematical or mechanical exercise how many policies the development complies with and how many it is in conflict with, in order to determine whether an application accords with it. Rather it is a case of a decision maker coming to a view as to the policies that are most important to the determination and then forming a professional judgement as to whether the development is in accordance with the overall objectives of the plan. This exercise calls for a series of judgements to be made, which may include determining the relative importance of the policy, the extent of any breach and how firmly the policy favours or set its face against such a proposal.

5.1.3 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.

5.1.4 The following issues are considered in the assessment:

- Principle
- Housing mix, need, & level of development

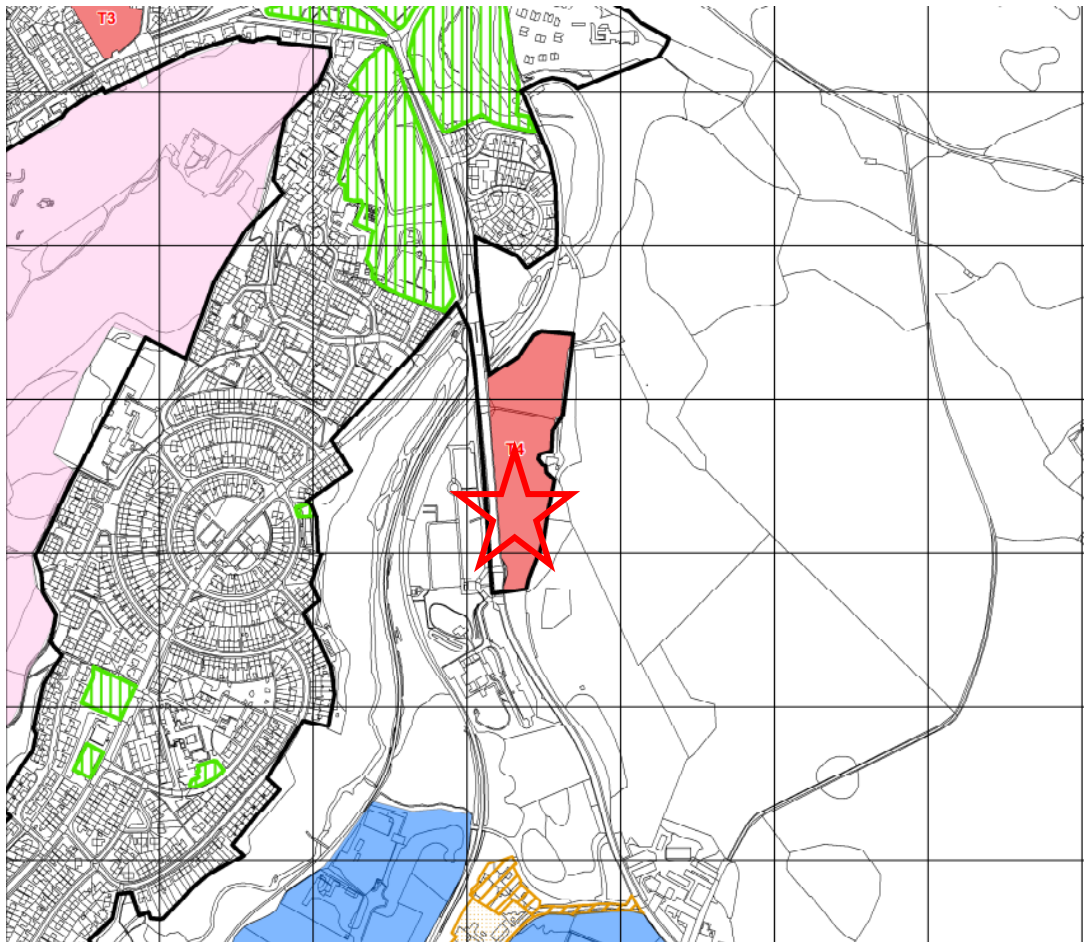
- Affordable housing
- Agricultural land
- Design & context
- Heritage Assets & Archaeology
- Residential amenity & privacy
- Ecology
- Trees
- Drainage
- Access & Accessibility
- Sustainability
- The Welsh Language
- Open space
- Planning Contributions
- Air Quality

5.2 Principle

- 5.2.1 The proposal would utilise a Site that is set entirely within the development boundary of the Sub-Regional centre of Bangor 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 wide range of services, facilities, and employers within the town and the wider region. Finally, it is also allocated for housing within the JLDP (as site reference T4). As such, it is clear that this proposal will make a suitable use of this site that would entirely align with the JLDP allocation.



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



- 5.2.2 This is of relevance to matters of principle as the delivery of housing on allocated sites forms an important element of the housing delivery strategy for the area with such sites providing a significant contribution to the total expected land supply (along with reasonable levels of windfall development). The Site is also set within the highest category of settlement within the plan – the Sub-Regional centre – which alongside the 7 Urban Service Centres is expected to accommodate the majority of the residential growth in the plan area (per policy PS17).
- 5.2.3 Therefore, it is submitted that the Proposed Development complies with the policy set out in **chapters 3 & 4 of PPW, and policies PS/5, PCYFF1, PCYFF2, PCYFF 3, PCYFF 4, & TAI1 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.

5.2.4 It is noted that the LPA were of the same view in their response to Pre-Application Enquiry (PAE), though comments were made on more detailed matters relating to housing supply that are examined later in this statement.

5.3 Housing mix, need, & level of development

5.3.1 Policy TAI 8 looks at Housing Mix, and in this instance the mix has been prepared in consultation Adra, who will be the ultimate site owners, and the developer to determine what the local market and 'need' is in Bangor at the present time. In this case, the application is being presented as a mixed tenure scheme, meaning that the Applicant is happy to provide the scheme as 100% affordable housing (considerably exceeding the 20% affordable housing proportion sought for development in Bangor) and with a mix of differing tenures as set out in the Affordable Housing and Housing Mix Statements. The intention of the ultimate owner - Adra - is that the Proposed Development will be provided as entirely affordable housing with a mix of different tenures provided (e.g. social rent, intermediate affordable rent). This would be reasonable and appropriate as it exceeds policy requirements.

5.3.2 As stated above, 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.

5.3.3 The following mix is proposed:-

Table 1 – Proposed mix detail

Unit type	No.	Type of dwelling	Bedroom no. per unit
2-person 1bed Apartment	8	Apartment	1
3-person 2 bed Apartment	6	Apartment	2
3-person 2 bed Bungalow	5	Bungalow	2
4-person 2 bed house	13	Two-storey house	2
5-person 3 bed house	4	Two-storey house	3
5-person 3 bed dual aspect house	6	Two-storey house	3
5-person 3 bed supported living bungalow	1	Supported living bungalow	3
5-person 3 bed wide frontage house	2	Two-storey house	3
7-person 4 bed house	2	Two-storey house	4
8-person 5 bed house	1	Two-storey house	5
Total no. dwellings	48	Total no. bed spaces	108

- 5.3.4 The submitted Housing Mix Statement 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 in relevant local policy & strategy. It is concluded that the Proposed Development broadly 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, which is very substantial.
- 5.3.5 As such, it is considered that the Proposed Development 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 development on a highly accessible site in a key settlement and so assist in meeting the need for affordable dwellings in the area.
- 5.3.6 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.
- 5.3.7 Turning to the question of ***the growth level identified for the settlement***, policy TA12 identifies the following indicative growth for Bangor:-

Table 2 – Identified indicative growth level for Bangor

Total	Completed units (2011 – 2015)	Commitments (Land Bank - Housing) (April 2015)	Housing Allocations: Commitments (Land Bank - Housing) (Apr 15)	Housing Allocations: Without Planning Permission (Apr 15)	Indicative supply level – windfall sites
969 (inclusive of 10% slippage for all sites)	211	180	218	148	212

- 5.3.8 It is understood from correspondence received from the Joint Planning Policy Unit that supply in the settlement currently stands at the following level (based on latest available data).



Table 3 – April 2024 housing supply position in Bangor

Category	A. Indicative supply (inclusive of 10% slippage allowance)	B. Completed units (2011-24)	C. Land bank (excluding those unlikely to be developed) 2024	D. Designations without consent	Remainder (=A-B-C-D)
Bangor - Total	969	737	292	119	-175
Allocations	393	266	70	115	-58
Windfall	576	471	222	-	-117

5.3.9 Whilst the Proposed Development would deliver less than the 72 units allocated on the site, it would still result in a cumulative exceedance of the indicative growth level set in the JLDP for Bangor. From correspondence with the LPA, it is understood that the main centres settlement tier within which the site sits has sufficient capacity to accommodate further development (with a deficit of 95 units). In any case, it is submitted that this further modest exceedance is justified owing to the following factors:-

- i) The Housing Mix Report includes details of available housing need data (i.e. Social Housing and Tai Teg Registers) which shows a very considerable demand for affordable housing. This recorded need considerably exceeds the available supply of both allocated and consented sites, and this proposal would go some way toward meeting that due to the 100% affordable housing approach proposed. On its own this unmet need provides a pressing basis to deliver more housing in the settlement, and the use of this allocated site represents the most sequentially preferable option for delivering that need over greenfield or exception sites;
- ii) It is not certain that all of the sites within the landbank will be delivered, especially as several of the windfall sites are now toward the end of the life of their consents and do not appear to have been taken up.

5.3.10 As such, it is submitted that there is a sound and reasoned basis for approving this scheme and cumulatively 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 the registered affordable housing need, but this falls outside the scope of this submission and document.

5.3.11 **Scheme density** is 19.2 dwellings per hectare (48 dwellings on a 2.5ha site) which falls below the minimum target density of 30 dwellings per hectare sought in the plan (at PCYFF2). However, it is submitted that the Proposed Development makes best

use of the Site without resulting in a level of density that is out of character with the area or harmful to amenity, and in particular that respects the value of the Heritage Assets that adjoin the site (this point is examined in more detail later in this section). Indeed, it is noted that a previous application was made for 66 dwelling on the Site (26.4dph) and was withdrawn in the face of concerns about the suitability of a development of that density on the Site. Therefore, a balance should be struck between seeking to meet the level of development targeted for the site and the density figures sought by the LDP, and addressing the constraints that exist in a suitable manner. As such, the proposal complies with **policies PCYFF2 & TAI8 of the JLDP**.

5.4 Affordable housing

- 5.4.1 As set out in the preceding section, the proposed approach is for the Proposed Development to be delivered as 100% affordable housing, considerably exceeding the 20% contribution sought by policy (providing 48 affordable dwellings rather than 9.6).
- 5.4.2 It has been shown in the Affordable Housing Statement that there is a clear need for affordable housing in the settlement, and that the need considerably exceeds the number of houses proposed on the Site, and the level of affordable housing that will be delivered by other 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 various housing need registers.
- 5.4.3 It is proposed that the affordable housing restriction will be discussed and agreed with the LPA during the application.
- 5.4.4 As such the development complies with the approach set out **in section 4.2 of PPW, and in particular para's 4.2.25-33, TAN2, and JLDP policy TAI15 as well as the current SPG on affordable housing** as it will meet and can be expected to considerably exceed the required target for affordable housing percentages on sites within Bangor.



5.5 Agricultural land

- 5.5.1 Despite the Site's allocation (which is a direct acceptance by the LPA that the site is suitable for development and that all alternative options have been considered and discounted) the LPA indicated in their PAE response and subsequent discussions that either a detailed assessment of the quality of the land should be provided (to demonstrate that it is a lower grade) or a justification as to why there is still a need to develop on such land in the Bangor area.
- 5.5.2 To address this, the Applicant has commissioned Kernon Countryside Consultants to provide an assessment of land availability around Bangor. That document sits alongside the justification presented here.
- 5.5.3 Dealing with the justification for release of land it is submitted that the following justify the use of the Site:-
- i) There is a very substantial unmet need for affordable housing in the City (per the detail examined earlier in this section and in the Affordable Housing Statement). This need is so substantial as to justify the use of land outside of the settlement boundary as it cannot be met through the consented landbank, and per detail presented in the submission this would involve use of land of BMV grades due to the nature of the land set around Bangor.
 - ii) The Site is allocated, and thus is a sequentially preferable site for residential development within the LDP over land not allocated within the Plan, and especially over land falling outside of the development boundary. Thus, it should be utilised in preference to other land when meeting the housing needs of the area.
 - iii) There is no guarantee that all development within the 'land bank' will come forward, especially so as a number of the consents are older and have not been taken up despite their age. In the situation where the consents on these sites expire the indicative growth level set out within the LDP for Bangor would not be met. Thus, less weight should be accorded to this point when assessing this issue.
- 5.5.4 In addition to the above factors the submitted Agricultural Land Quality Condition Report provides an assessment of the Site itself and the availability of other land around the settlement. It should be read in full, but briefly it concludes:-



- i) The Site is small and awkwardly shaped, meaning that it is narrow for farm machinery and not suitable for grazing animals as they would poach the land quickly. It is also not suitable for arable uses due to the restricted width. Thus, it could not be practically exploited to benefit from its grading. The Site appears to have only be used for grassland from available aerial imagery, confirming these conclusions. Thus, in practical terms the shape of the field means that it is not versatile.
 - ii) Other land around Bangor is examined and it is demonstrated that there is no poorer quality land available as other land around the settlement falls within the same BMV grades.
 - iii) The use of the Site would be a minor development under IEMA guidelines (being less than half the relevant threshold), and falls well below the threshold for consultation with the Welsh Government on use of BMV land for other purposes.
 - iv) The report therefore concludes that *“based on the above, it is considered that only limited weight should be given to the loss of this small area of agricultural land, and that poorer quality land is not available”*.
- 5.5.5 Therefore, it is submitted that there is justification for the use of the Site to meet local housing need, that there is no land of a lower grade available in the locality that could meet that need, and that the Site is of limited value due to its shape and nature. Thus, the use of this small area of BMV land is justified per the requirements of ***para’s 3.58-3.59 of PPW, TAN6, and policy PS6 of the JLDP***.

5.6 Design & context

- 5.6.1 When assessing design, the initial process seeks out the context of the Site and surroundings. The Site lies on the edge of the built form of the city with residential development set to the north and west.
- 5.6.2 Full detail of the design approach adopted for the Proposed Development is provided in the detailed ***Design & Access Statement*** submitted in support of the application, which includes a context appraisal, design vision, and details of the approach to matters such as accessibility, sustainability, and community safety. Thus, that detail is not be repeated in full here.
- 5.6.3 Briefly, 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 approach, but is contemporary in terms of the dwelling design. A suitable palette of materials is proposed that reflects and compliments the setting of the Site. 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.

5.6.4 Particular care has been exercised to ensure that the scheme respects and compliments its setting adjacent to the Heritage Assets (HAs) to the west, with the following features incorporated into the design to ensure this:-

- i) A substantial landscape buffer along the Site's eastern edge to provide a physical and visual break between the buildings and the HAs.
- ii) Careful placement of properties and access roads to provide visual breaks through the site to retain open views from the east, north, and south.
- iii) Adjustments to the design of road infrastructure to reduce visual impact.
- iv) Careful placement of parking areas to ensure that they are concealed and/or screened in views.
- v) Retention of existing access to Incline Cottage and Nursery Cottage to reduce physical intervention adjacent to the HAs.
- vi) Retention of established trees around the Site's periphery.

5.6.5 Greater detail on this point is provided later in this section and in the Heritage Impact Statement provided as part of the submission, but overall it is clear that a considerable degree of care and thought has been applied to the design of the scheme to reduce its impact upon the adjacent HA's.

5.6.6 This approach also ensures that the Proposed Development will provide a high-quality environment for its occupiers due to the extensive amenity and recreation space included within the scheme. The parking approach has been designed to avoid parked vehicles dominating the street scene (whilst still complying with the LA's required parking standards) with parking carefully placed and extensive landscaping used to soften the effect. This arrangement will provide a higher quality streetscape and an attractive layout.

5.6.7 Finally, a detailed **hard and soft landscaping design** has been provided as part of this submission, with the proposed scheme designed to ensure that the Site is landscaped to a high standard and integrates successfully into its setting. The scheme also offers ecology benefits per recommendations in the relevant report.



- 5.6.8 Alongside this, a Landscape Condition Assessment and Restoration Strategy has been produced that assesses the landscape condition of the section of the Penrhyn Slate Quarry Railroad Scheduled Monument (SM) within the Site and sets out a methodology for restoration, and an approach for sensitive management of the existing landscape elements as well as long term maintenance. This would ensure the sensitive removal from the SM of scrub and of existing mature trees as they die (down to ground level with no replacement proposed) and implementation of grassland cover in their place. This would balance the imperative to respect and improve the state of the SM with ecological and habitat considerations, as the removal of the vegetation on the SM would take place carefully and in a structured manner alongside the provision of new planting as part of the wider landscaping scheme thus ensuring that mitigation, compensation, and enhancement is secured from the limited removals that are proposed. The SM would then be sensitively managed as part of the landscape management of the Site, thus retaining the improvement in its condition in the long term. Sufficient detail has been submitted to allow assessment of this matter, and final detail of the approach to this aspect of the Proposed Development is suitable for control via condition upon any consent.
- 5.6.9 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.**
- 5.6.10 It is noted that the LPA raised no concerns with the indicative design in their PAE response, and indeed welcomed the steps taken to ensure that the development would respect and compliment its setting. As such, it is assumed that this will continue to be the case with the final scheme design.

5.7 Heritage Assets & Archaeology

- 5.7.1 The Site is set adjacent to and partially overlaps with several Heritage Assets (HA), with the following set on or adjacent to it:-



- i) North West Wales Slate Landscapes UNESCO World Heritage Site (WHS)
- ii) Penrhyn Slate Quarry Railroad Scheduled Monument (SM) (Marchiogon Incline Plane/Tramway)
- iii) Incline Cottage Grade II Listed Building (LB)
- iv) Penrhyn Park Boundary Wall Grade II LB
- v) Penrhyn Castle Grade II* Listed Registered Historic Park & Garden (RHP&G);
- vi) Dyffryn Ogwen Landscape of Outstanding Historic Interest (RHL) (this covers the entire Site).

5.7.2 There are also other HAs that are proximate but more distant from it:-

- i) Penrhyn Castle Grade I LB
- ii) Walls and Attached Structures to Terraced Flower Garden [of Penrhyn Castle] Grade II LB
- iii) Pont Marchogion Grade II LB

5.7.3 Thus, impact upon these assets has informed the design approach taken from an early stage, with the scheme Architect providing specialist heritage advice from project inception throughout design up to this point of submission. The design has also been assessed by Aeon Archaeology in their role as Heritage Advisors to the Applicant.

5.7.4 Early discussions were also held with Cadw to ensure that the intended approach reflected their expectations and requirements. It is intended that this collaborative approach will continue throughout the PAC and application submission to ensure that the Proposed Development achieves the high standard of design and care to its setting that all parties would wish to see.

5.7.5 A Heritage Impact Statement (HIS) has been prepared by Aeon Archaeology as part of the submission that assesses the context of the Site, the Heritage Assets set around it, and the impact of the Proposed Development upon the HAs and the measures taken in the design of the same to ensure that the best solution is achieved. The HIS must be read for a full, but briefly it confirms the following:-

- i) The report notes that the design process for the Proposed Development has sought to avoid impacts to the historic environment and indeed *“has been designed to fall within the norms of conservation practice”*. Chapter 8 examines



the Proposed Development in detail and notes the following aspects of the design:-

- a. Reduced density from the site allocation of 72 dwellings.
 - b. Arrangement of dwellings in clusters and smaller groupings, careful orchestration of scale, and retention of sightlines across the development to the HAs.
 - c. Provision of generous open space for landscape and amenity which provides a buffer to the HAs set along the eastern boundary.
 - d. Creation of new opportunities for public access alongside and interpretation of the HAs set along the Site's eastern side through:- a footpath along the eastern boundary, delivery of an interpretation scheme, and inspiration of the design of play features by the historic railroad – thereby creating *“a valuable community asset, promoting an accessible, deeper understanding and appreciation of Gwynedd's unique heritage”*.
 - e. Retention of the existing access route alignment to Incline Cottage and incorporation within the Proposed Development flanked by soft landscaping.
 - f. Careful placement and screening of car parking, bin storage areas, pumping station and electrical substation.
 - g. Retention and relocation of a slate water trough within the Site.
 - h. Careful selection of the material palette to reflect the *“historic environment and broader local vernacular”*.
 - i. Specific and detailed measures to carefully remove smaller vegetation and established mature trees from the SM and put in place a native wildflower mix grassland/meadow to ensure the proper management of SM (see para. 5.6.8 for greater detail).
- ii) Per Chapter 9, 10, & 11 the Proposed Development would have no negative impacts upon the majority of the designated HA set on and around the Site, namely:-
- a. North West Wales Slate Landscapes UNESCO WHS
 - b. Penrhyn Slate Quarry Railroad SM (Marchiogan Incline Plane/Tramway)
 - c. Penrhyn Park Boundary Wall Grade II LB
 - d. Penrhyn Castle Grade II* Listed RHP&G;
 - e. Dyffryn Ogwen RHL

- f. Penrhyn Castle Grade I LB
 - g. Walls and Attached Structures to Terraced Flower Garden [of Penrhyn Castle] Grade II LB
 - h. Pont Marchogion Grade II LB
- iii) However, it would by means of changing its setting have a negative impact upon the setting and significance of Incline Cottage (a Grade II LB) though change to the landscape in which it is set. However, this impact has been “*ameliorated as much as possible by inherent mitigation embedded within the design*”.
- iv) The HIS notes that the LPA will have to assess the merits of the Proposed Development against the impacts upon this single HA and the desirability of preserving its setting.
- v) Chapter 11 provides conclusions, and states:-

“With the exception of the Listed Building Incline Cottage the proposed development would have no negative impacts on any designated historic asset. By means of changing its setting, the proposed development would have a negative impact on the setting and on the significance of Incline Cottage.

The proposed development has been designed to fall within the norms of conservation practice and the design process sought to avoid impacts to the historic environment. In this instance, however, the characteristics of the proposed development mean that some negative impact for one designated historic asset cannot be avoided. The impact, however, is ameliorated as much as possible by inherent mitigation embedded within the design.

Changes to the historic environment, it should be remembered, are an ordinary incident of development and changes which result in harm in order to achieve public benefits, such as the provision of housing are accommodated within the planning process and allied statutory provisions.”

- 5.7.6 A Heritage Statement (HS) has also been prepared by AGA as part of the submission that assesses the context of the Site, the Heritage Assets set around it, and the Proposed Development itself and the design approach and measures applied to ensure that it respects the context and setting of the various HAs set around it. The HS must be read in full, but briefly it confirms:-



- i) The approach taken to the layout of the scheme to ensure that:- the importance of and visibility of Incline Cottage is retained along with the existing access route; density is reduced and dwellings are placed in small close knit groups, in order to respect the setting of the HAs and retain views through the site; sufficient space is provided through a buffer on the scheme's eastern side ensuring that there is a sensitive relationship to the HA's on the boundary, with access provided in an appropriate manner close to them; careful placement of car parking to avoid this appearing in sightlines wherever possible; a sensitive approach is taken to retention of existing vegetation wherever possible; and, that the scheme includes other features to break down and soften its impact.
 - ii) Materials and design are in keeping with the locality, both in the dwellings and in the approach to landscaping.
 - iii) The Site will open access to allow appreciation of the HAs with interpretation to also be provided (the approach to interpretation will be finessed as the scheme progresses).
 - iv) The intended approach to management of the SM where it is set within the Site is set out, and that this would be expanded as the scheme progresses (para. 5.6.8 for greater detail).
- 5.7.7 Overall, the Proposed Development will have no negative impacts upon the majority of the designated HAs set on and around the Site and thus will preserve them or their settings (as applicable). Whilst there would be an impact upon the setting of a single LB (Incline Cottage) this has been ameliorated as much as possible by the mitigation embedded into the design. In addition, the Site's allocated status indicates that some degree of impact upon Incline Cottage was accepted by the LPA and the appointed Inspector during the production and examination of the LDP as this would be inherent to the development of the Site. Indeed, the development of allocated sites is key to delivery of the JLDP strategy and thus *"support[ing] the wider economic and social needs of the Plan area"* (per the opening sentence of policy PS 20).
- 5.7.8 Linked to the social needs of the plan area is the delivery of sufficient affordable housing to meets the needs of its community, with the Proposed Development making a substantial and valuable contribution to addressing the considerable unmet affordable housing need of Bangor.



- 5.7.9 The benefits to other HAs that are embedded into the Proposed Development must also be weighed alongside the impact to the setting of a single HA (such as new opportunities for public access alongside and interpretation of the HAs set along the Site's eastern side, and the measures to improve the condition of and then preserve the SM set out in para. 5.6.8).
- 5.7.10 Thus, the impact upon the setting of Incline Cottage must be weighed against the wider benefits of the Proposed Development and the role of the Site as a housing allocation with the JLDP, which weigh in favour of the Proposed Development in the planning balance when set against its modest impact.
- 5.7.11 Therefore, the Proposed Development would have an acceptable impact the Heritage Assets that adjoin/overlap the Site and thus that the proposal complies with **section 6.1 of PPW and TAN24, and policies PS20 & AT1 of the JLDP.**
- 5.7.12 Turning to **archaeology**, at an early stage of the project Heneb: Gwynedd Archaeological Planning Services (Heneb) were consulted due to their role as archaeological advisor to the LPA and the clear heritage value of the site. It was confirmed by Heneb that there is potential for features of archaeological value to be present on the Site.
- 5.7.13 As a result, an Archaeologist (Aeon Archaeology) was engaged to consider the matter. Their Project Design (PD) report has been provided alongside this statement and should be read in full. However, in brief, the report confirms that the intended approach will be to undertake a strip, map, and record (SMR) excavation of the Site that will confirm the presence or absence of archaeological assets, and if any are found allow for a detailed record to be made of them prior to any development work commencing, along with any post-excavation assessment as may be required.
- 5.7.14 Discussions will continue to take place with Heneb prior to and during the application process to ensure that the PD is satisfactory and that all relevant matters are fully addressed.
- 5.7.15 It is the Applicant's intention that provided that the PD is satisfactory to Heneb that the SMR will take place as the application progresses, which will have the benefit of providing certainty as to the value of the Site to all parties and potentially obviating the need for a condition upon any consent to address the result of the SMR work.



5.7.16 Should the application be determined before the SMR has concluded then it is suggested that this matter is suitable for control through the imposition of a condition upon any permission. Subject to agreement on the matter by the LPA, this can then be conditioned to be followed as part of any consent, with model condition 24 from WGC 016/2014 suited to that purpose, subject to an adjustment to reflect the expected approval of the PD for SMR.

5.7.17 Thus, 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 any features of value that exist in the Site are adequately investigated.

5.8 Residential amenity & privacy

5.8.1 The submitted design would respect the amenities enjoyed by the occupiers of the single neighbouring property (Incline Cottage) as the proposal is set at a suitable distance from it (c.29m at the closest point, and much further for the majority of development) and would be of an appropriate height and form to ensure that it would not have an overbearing impact upon the property.

5.8.2 Activity on the Site would be relatively limited and low-key due to nature of the use and would not be harmful to neighbours due to the level of separation involved and the existing urbanised 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 the neighbouring property.

5.8.3 A suitable level of amenity space will be provided for each of the proposed dwellings, with sufficient space 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 high standard of privacy and amenity, and this again has been designed to comply with the relevant LPA guidance. The properties are also suitably separated from the A5.

5.8.4 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 the neighbouring property and to provide a good standard to its own occupiers.

- 5.8.5 As the proposal involves new development in proximity to a residential dwelling it will result in some **impacts upon neighbours during the Construction Phase**. However, the Site is well separated from the property in question and this coupled with the limited duration of works mean that the impacts will be modest and not materially harmful to its neighbour's amenity, and certainly not to an extent that would justify refusal of this application. In addition, the Applicant intends to provide a Construction Environment Management Plan that will include detail of measures to control construction impacts and prevent issues arising that could materially harm the amenity of neighbours. That document should then be subject to control through a condition upon any permission. 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 08:00-13:00 on Saturdays would be appropriate hours for this Site.

5.9 Ecology

- 5.9.1 A Preliminary Ecological Appraisal (PEA) report, Bat activity survey report, and Green Infrastructure Statement have been provided by Enfys Ecology, which includes survey results. The reports have been submitted with the application and should be read in full, but in brief they confirm that:-

- i) **Records search** – There are no protected or designated habitats within the Site, though there is a SSSI, SAC, SPA, & LNR set within c. 585m of the site. No direct impacts are expected upon those designations, subject to standard measures to control surface water during the construction phase. There are also candidate and designated wildlife sites adjacent to the Site and set around it in the wider area, and an area of restored ancient woodland on its northern boundary, impacts upon which can be avoided through scheme design and control measures during the Construction Phase. 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) **Habitat** – The Site contains a mix of habitats comprising mainly improved and semi-improved grassland, with areas of scrub, hedgerows, trees, a small area of woodland, wall and a ditch set around the Site's periphery. The development would be placed almost entirely within the grassland and scrub, except for some hedgerow removal required to form the vehicular and pedestrian entrances. The habitat assemblage is not rare or notable, and as such the PEA report concludes that suitable mitigation and enhancement can be provided through avoiding removal of trees and implementation of a detailed landscaping scheme, with its recommendations carried through into the submitted design. The key potential impact to be considered is the removal of a short lengths hedgerow on the eastern edge of the site boundary to create an accesses and required visibility splays, and removal of a small area of semi-improved grassland and small areas of scrub, which would be compensated for through the creation of new hedgerow and other planting within the scheme that would also offer considerable enhancement to the Site.
- iii) **Protected & non-protected species** – Due to the placement of the proposed development primarily on grassland only limited impacts upon fauna are identified, and no signs of protected or priority species were found during the survey work other than bats with several species utilising the site and bats emerging from Incline Cottage during survey work. The potential impacts upon bats have been addressed through avoiding removal of trees, retention of dark corridors around the Site's northern, eastern, and southern sides, and careful lighting design. Enhancement would also be provided through bats boxes incorporated into the scheme. Otherwise the main potential impacts would be upon:- birds that may be nesting on the Site (which can be addressed through timing of works or nesting bird surveys, with enhancement provided through inclusion of nesting boxes in the scheme and landscaping measures to create habitat); hedgehogs (through careful clearance of any habitat piles and with specific mitigation set out and carried through into the scheme); otters (requiring a pre-commencement survey to confirm if they are using the Site as laying up area, with impacts otherwise not expected to occur); badgers (that could occasionally access the Site, which would be dealt with through a pre-works survey and RAMS); red squirrels (only if tree felling is proposed, which is not the case); and, reptiles (through specific mitigation measures for removal of rubble or logs, and for structured clearance of grassland). The report also recommends

a suite of pre-commencement surveys prior to construction to confirm the presence or absence of key species on the Site (which is easily conditioned as part of any approval). No other species were found to be present, and general RAMs are set out to avoid potential effects upon the identified species as well as any other fauna that may use the Site. The PEA also sets out recommendations for enhancement, which have been carried through into the design of the Proposed Development (for instance in the landscaping scheme);

- iv) **Invasive Non-Native Species** – Cotoneaster is present on Site in very small amounts in a single location the wall of the site. 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;
- v) **Green infrastructure** - The submitted GIS confirms that the Site does provide habitat of value to some species but that the habitats on the Site are not rare of notable, though the habitat set around it is valuable. Whilst there would be some habitat loss this has been minimised and directed to lower value habitats, and avoidance measures specified to reduce the impacts that would occur (in particular through avoiding the trees that adjoin the Site, and retaining a dark corridor around northern and eastern sides of the Site). For the habitat losses arising from the proposal¹, 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 integrating with the features of higher value that already exist and will be retained as part of the scheme). It is also confirmed that compensation & enhancement will be provided through provision of a tree planting, bat and bird boxes and 'hedgehog highways' and other similar measures per the report. As such, the scheme will deliver biodiversity & ecosystem resilience and net benefit. The report also notes the benefits of the

¹ Per the Landscape Condition Assessment and Restoration Strategy and para. 5.6.8, a small number of trees on the SM would not be replaced when they die, but these would not be removed prior to that time. This forms part of steps to manage and improve the condition of the SM. These impacts would be in the medium term, but prior to this the new planting that will mitigate and compensate for these impacts will have been planted and will establish prior to the natural loss and subsequent removal of the trees from the SM. The clearance of scrub will be more immediate, but will be mitigated and compensated for by new meadow planting on the SM and other planting outside the SM. In addition, the package of enhancement will ensure that the modest impacts from the change to vegetation cover on the SM will be addressed and net enhancement delivered.



schemes approach to access and health and well-being, which has been carefully integrated into the landscape design, and will be a benefit to the area and those living on the Site.

5.9.2 Overall, the measures set out in the report will protect the favourable conservation status of the species present on the Site and will 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.**

5.9.3 It is considered that the survey effort and approach taken reflects that sought by the Senior Biodiversity Officer in their response to the pre-application enquiry, and in subsequent direct discussions with the scheme Ecologist, and it is noted that no in principle or substantive concerns were raised at that stage. As such, it is expected that the LPA will continue to be satisfied with this aspect of the proposal.

5.10 Trees

5.10.1 In respect of trees, as the Site is set close to of several trees a detailed Arboricultural Survey was commissioned from West Coast Arboriculture & Land Planning Limited, with their advice influencing the scheme design. The resulting report and plans are included as part of this application, and conclude that:-

- i) No trees require removal to enable the Proposed Development². There would be some overlap between the attenuation pond and the proposed footpaths and the Root Protection Areas of several trees, but these can be addressed through adoption of suitable construction techniques.
- ii) The report and accompanying plans set out detailed measures to safeguard the retained trees during and following development, inclusive of some dead wooding, crown lifting, and pruning/trimming to ensure that there are no conflicts

² Per Landscape Condition Assessment and Restoration Strategy and para. 5.6.8, a small number of trees on the SM would not be replaced when they die, but these would not be removed prior to that time. This forms part of steps to manage and improve the condition of the SM. Prior to this occurring the new planting on the wider Site that will mitigate and compensate for these impacts will have been occurred and will establish prior to the natural loss and subsequent removal of the trees from the SM.



with equipment during construction. This scheme is detailed and is suitable for approval as part of this application and then imposition through conditions as part of any consent.

- iii) More than sufficient enhancement in the form of new planting is provided as part of the proposal to ensure overall benefits to tree cover on the site.

5.10.2 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. 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 Welsh Government Circular (WGC) 016/2014.

5.10.3 It is noted that the site is set adjacent to an area of restored ancient woodland. Impacts upon this have been avoided through the design of the scheme, with a substantial buffer afforded to it. As such, the proposal complies with the approach set out within para. 6.4.43 of PPW.

5.11 Drainage

5.11.1 An Initial Drainage Strategy 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 off Rhodfa Penrhyn in the Maesgeirchen Estate a short distance to the north-west of the site, with this connection point agreed with DCWW during pre-application discussions. The Developer Enquiry provided in the report (as an appendix) also confirms that there is adequate capacity in the local wastewater treatment works to accommodate the proposal. An on-site pumping station will also be required, which would be constructed to DCWW adoption standards. Following any planning consent further agreements and consents will need to be sought and agreed with DCWW prior to commencement of work on the drainage system.



- 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 not feasible in this case due to site conditions. Thus, it is proposed that surface water will be managed within the Site through a retention pond (which will be unlined allowing for infiltration) and with a connection from that feature to the watercourse set in the northern most corner of the site allowing a controlled discharge into the watercourse. Use of permeable pavements, rain gardens, and other such features is also proposed. Rainwater re-use features may be added at detailed design stage. This approach reflects the SuDS hierarchy and would ensure that this Site is suitably drained. It is anticipated that SAB pre-app advice will be sought concurrently with the application, allowing for any required adjustments to be made as part of this application. An application for SAB consent would then follow on from any planning approval.
- 5.11.2 As such, the Proposed Development will comply with **sections 6.6.17-6.6.21 of PPW and with TAN15, 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.
- 5.12 Access & accessibility**
- 5.12.1 In respect of **vehicular access**, the Proposed Development will be served by an improved access onto the A5. The access would provide a good standard of visibility for motorised vehicles and cyclists entering and emerging from the Site. The proposed entrance will also provide a suitable **pedestrian access** from the Site, along with the proposed pedestrian entrance on the Site's eastern boundary at the bus stop that adjoins it and at its southern most point, and a potential pedestrian link toward Lon Las Ogwen on the site's northern side³. This arrangement will provide a

³ This link is included up to the Site edge as access beyond this would be through agreement with the relevant landowners and so would require separate work to address this. This arrangement would ensure that a connection could be made once any such discussions have concluded.



good standard of access onto the wider pedestrian network within the settlement, and indeed will allow through it for other users. The proposal also includes improvements to footway widths along the A5 in proximity to the site, and to the bus stop that adjoins it, delivering planning gains for all users⁴. As such, the scheme will be readily accessible by those on foot.

5.12.2 As the proposal is a major development 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.

5.12.3 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 (Section 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 vehicle speeds being reasonable.
- ii) **Proposed development (3)** – The report then assesses the Proposed Development itself and demonstrates that the Site access would be suitable and safe, with a suitable level of visibility provided that complies with the guidance in TAN18 (per the body of the report and accompanying plan) along with a ghost island turning lane in the highway. Detail of the proposed improvements to pedestrian footways in the area and the bus stop adjacent to the Site is also set out. This section also confirms that the access arrangements have been discussed with the Highway Authority who advised that they were satisfactory. The report also states that the internal roads are well laid out and can accommodate all traffic (with the accompanying plans demonstrating this through a swept path drawing).
- iii) Section 3 also examines **parking** (3.11-3.12) which is shown to generally comply with the Council's maximum standards set out in the CSS Wales Parking Standards, with only a small reduction below the standard for the certain

⁴ The proposed improvements would be set within the highway, and sufficient detail has been submitted to allow their assessment and acceptance during the application (subject of course to any discussions during the application as may be required between the HA, LPA, and Applicant). Thus, the final approach and timing of these works can be addressed via a condition upon any consent, with model condition 47 of WGC 016/2014 providing a suitable template.



properties. However, this is entirely suitable bearing in mind the accessibility of the Site and the reasonable expectation that car ownership levels will be lower on this affordable scheme.

- iv) **Accessibility (4)** – This section comprehensively assesses the accessibility of the Site via non-car modes of transport, with the Site shown to have an excellent level of accessibility for pedestrians, cyclists, and by public transport with all required day to day facilities reachable via non-car modes, and regional and National destinations readily accessible via rail from the station in Bangor.
- v) **Anticipated highway impact (5)** - Expected vehicle movements from the Proposed Development are appropriate for the Site's setting (21 two-way vehicle movements in the weekday AM peak and 19 in the PM peak, equating to one vehicle trip approximately every 3 minutes) and indeed the report states that *"the effect of this additional traffic on the local highway network will be barely perceptible during the peak hours and less so outside of the peak periods. Having regard to the above, it is therefore considered that no further detailed assessment of the local highway network is required and that the traffic impact of the scheme is acceptable in planning terms"* (5.5-5.6) (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 local residents or property occupiers. This is especially so bearing in mind the nature of the area and the proposed design of the access arrangements, as well as the Site's allocated status in the JLDP);
- vi) **Summary and conclusions (6)** - The report finishes by summing up the case and concludes that *"it is considered that there should be no highway related reason to withhold planning permission, and the scheme is therefore commended for approval"*.

5.12.4 As such, it is submitted that the TS and 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 motorised vehicles and cyclists. It is also clear that the Site can be provided with suitable pedestrian access arrangements and is highly accessible via non-car modes.



- 5.12.5 As such, the Proposed Development 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.
- 5.12.6 Discussions were held with the Highway Authority at pre-application enquiry stage, which raised no substantive concerns or issues and only sought minor amendments to aspects of the scheme design. Those changes have been made to the Proposed Development, so it is expected that they will continue to be satisfied with the scheme.
- 5.12.7 Any **construction impact upon the highway** from the Proposed Development will be modest and limited in duration, and the Applicant intends to provide a Construction Traffic Management Plan as part of any application that will set out detail of measures to ensure that the Proposed Development will not impact in a harmful impact upon the operation or safety of the highway. That document should then be subject to control via a condition upon any consent.
- 5.12.8 Imposition of **construction operating hours** may 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 08:00-13:00 on Saturdays would be appropriate hours for this Site.
- 5.12.9 In respect of access by persons with **disabilities or mobility impairments** the Proposed Development has been laid out to provide 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 occupiers, such as the installation of a stair lift or full lift, either of which would be achievable within the proposed designs. In addition, the 1 and 2-bedroom flats will provide a single level dwelling in each pair, the bungalows will also be entirely single level dwellings, the 4-bedroom house type will provide a ground floor bedroom and bathroom as will the supported living bungalow. As such, it is submitted 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**.



5.13 Sustainability

- 5.13.1 In respect of **access via non-car modes of transport**, as per the Transport Statement and summary above, the Proposed Development is situated within walking and cycling distance of the wide range of shops, services, facilities, and the employment sites within Bangor. Several regular bus services are also available within easy walking distance of the Site allowing easy access to other key local settlements, and mainline rail services are available within the city allowing access to the wider region and nation.
- 5.13.2 As such, the Proposed Development is set in a highly accessible location and therefore has the potential to foster the adoption of non-car modes of transport by its occupiers.
- 5.13.3 The Proposed Development 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.**
- 5.13.4 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 Proposed Development 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.**
- 5.13.5 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 Proposed Development complies with the requirements of **section 6.6 of PPW and policy PCYFF6 (as well as PS5, & PS6) of the JLDP.**



5.14 The Welsh Language

- 5.14.1 Per the pre-application enquiry response provided by the LPA, a Community and Linguistic Statement 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 Proposed Development 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 development at an identified local need for affordable housing. Indeed, it is submitted that the Proposed Development would deliver key benefits 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 affordable housing need in the locality. This will allow local people in housing need to establish long term homes in their community. Thus, the Proposed Development would provide a long-term asset for the community in meeting affordable housing need. The impact of the Proposed Development in assisting in addressing the issue with housing affordability in this locality and the benefits in retaining Welsh users in this community should not be underestimated. In particular, retaining the young who are of course vital to the future of the language and the most likely to require assistance in accessing housing.
- 5.14.2 Per the detail earlier in this Statement, any permission would be subject to a S.106 Planning Obligation and to the Local Authority's CHAP, which would include measures to ensure that the relevant dwellings are retained as affordable homes in perpetuity and to manage their occupancy inclusive of steps to favour local residents. Bearing in mind the latter control, it is reasonable to expect that occupiers would as a minimum reflect the Linguistic profile of the community, and even on the occasions where any 'occupancy cascade' is applied this would extend outward sequentially from the Site into areas of the County that also have a reasonably high proportion of Welsh speakers. Thus, it is reasonable to conclude that the Proposed Development would deliver benefits 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.



- 5.14.3 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.
- 5.14.4 The fallback offered by the extant housing allocation on the site is also relevant, as this would allow a similar or higher level of dwellings to be built of which only 20% would be required to be affordable. The construction of that level of housing much of which would be likely to not be specifically targeted at local need would have an impact in itself and would be less helpful to the Welsh Language than this proposal to provide affordable housing to meet an identified local need for the same.
- 5.14.5 However, it is accepted that there is some potential for non-Welsh speakers to occupy the proposed housing.
- 5.14.6 A set of mitigation and enhancement measures are proposed in section 5 of the CLS, and those would provide a proportionate and sufficient response to mitigate the modest risks/impacts identified and ensure that the Proposed Development results in a neutral to mildly positive impacts for the Welsh Language and its use in this community.
- 5.14.7 Those measures could be controlled by way of a condition upon any permission requiring that the measures set out in the CLS 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 Proposed Development.
- 5.14.8 Thus, the Proposed Development 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 it would not result in any material harm to character and linguistic balance of the local community. In addition, mitigation would assist in addressing the residual impacts and ensuring a neutral or positive impact.

5.15 Open space

- 5.15.1 As the Proposed Development 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), and it was confirmed by the Joint Planning Policy Unit that there is a shortfall in equipped children's play space with all other categories of open space having excess provision. Thus, no contribution is required toward those other categories as part of the Proposed Development.

- 5.15.2 The following table provides calculations of expected open space on-site as part of this development. Per section 3.4 of the relevant SPG the one-bed flats are excluded from the children's play space calculations as the LPA considers that *"children in the 0-14 age range will not usually be resident"*. On that basis the Proposed Development results in the following levels of need:-

Table 4 – Required equipped children's 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	1.31	3.275	8	Nil
2	1.72	4.3	24	103.2
3	2.35	5.875	13	76.375
4	2.82	7.05	2	14.1
5 or more	3.18	7.95	1	7.95
Total			48	201.625
			Less oversupply	0
			Total	201.625

- 5.15.3 More than the required area of equipped children's play space has been accommodated within the open space set along the on the Proposed Development's eastern side, with this distributed along the pathways to provide a linear arrangement reflecting the routes through the site. This has the benefit of providing a more varied and stimulating play environment for children, maximising the recreational value of the routes that are proposed to be created, and avoiding the potential impact upon the setting of the adjoining Heritage Assets that might otherwise be caused by a single 'standard' fenced and contained play area. It is expected that the creative approach applied will be welcomed by the LPA and Cadw.

- 5.15.4 It should be noted that extensive informal recreation space has been accommodated in the eastern and southern parts of the Site through the pedestrian footpath network



that is proposed to be created. This will provide opportunities for recreation on the Site both by its occupiers and other the wider public and will also allow access alongside and appreciation of the Heritage Assets set along and within this part of the Site which has previously been unavailable. This will be a planning gain for the locality as delivery of a high-quality recreation and access route alongside the Heritage Assets will provide considerable amenity value to the area.

- 5.15.5 As such, the Proposed Development complies with the requirements of ***policy ISA 5 of the JLDP & the SPG Open Spaces in New Residential Developments.***

5.16 Planning contributions

- 5.16.1 At this stage it would appear that the Proposed Development would not be liable to make any other planning contribution, with no requirement for this raised in the LPA's PAE response. As such, the Proposed Development complies with ***policies PS2 & ISA 1 of the JLDP as well as the SPG on Planning Obligations.***

- 5.16.2 However, should such a requirement be raised during consideration of the application then the Applicant remains open to discussing the matter with a view to agreeing on a suitable approach.

5.17 Air Quality

- 5.17.1 As the site has potential to create impacts from dust emissions during the Construction Phase, and there is a potential impact upon the Proposed Development from emissions from the nearby crematorium (with the latter raised during consideration of the previous application on the site). Accordingly, an Air Quality Assessment was commissioned from Redmore Environmental Ltd. That report should be read in full, but in brief it demonstrates:-

- i) ***Dust Emissions*** – Potential impacts from dust soiling were identified as medium for earthworks and trackout, and low for construction, and impacts upon human health from dust were identified as low or negligible. As a result, the report recommends measures to mitigate dust emissions during the Construction Phase, which would be incorporated into a Construction Environment Management Plan that could then be controlled via condition upon any consent.



- ii) **Crematorium Emissions** – Emissions were classified as not significant under relevant guidelines, therefore there should be no barrier to approval on grounds of potential air quality impacts upon the occupiers of the Proposed Development.

5.17.2 Thus, the proposal complies with **section 6.7 of PPW, and the requirements of policies PS5 & PCYFF2 of the JLDP** as it is clear that the matter of air quality has been examined and that the Proposed Development would neither result in materially harmful impacts during its construction nor suffer from them once built.

5.18 Conclusion

- 5.18.1 Overall, the Proposed Development would develop an allocated Site set within the built form of Bangor to accommodate a suitable, attractive, and affordable housing development that would be suited to its setting and the wider locality in terms of its scale, form, and design. The scheme has been carefully designed to ensure that the setting of the Heritage Assets that adjoin it are respected and that their value is retained. The Proposed Development would provide a mixed housing development that will assist in meeting the substantial local need for affordable housing and thus will make a valuable contribution toward meeting the substantial level of housing need in the locality. 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.
- 5.18.2 Considering 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 Proposed Development would utilise an allocated site set within the existing built form of Bangor to accommodate a suitable development for the Site and locality.
- The proposed mix would meet identified local housing needs and is targeted at the recorded affordable housing need with a mixed tenure approach. Similarly, the level of development is appropriate bearing in mind the very substantial un-met need for affordable dwellings in Bangor and the Site's allocated status. As such, a further exceedance of the indicative growth level for Bangor is justified. The density of the scheme is also acceptable bearing in mind the constraints to the site.
- The use of this small area of BMV land is justified as there is a clear and substantial justification for the use of the Site to meet local housing need, there is not land of a lower grade available in the locality that could meet that need, and the Site is of limited value due to its shape and nature.
- The submitted plans show that the proposal would result in an attractive development that would respond well to its context and the character of development in the locality, and would successfully integrate into its setting.
- The Proposed Development has been carefully designed to be respect the value and setting of the Heritage Assets (HAs) in the locality. Whilst there is no impact upon the majority of HAs, the impact upon Incline Cottage must be weighed against the wider benefits of the Proposed Development and the steps taken to mitigate the impact.
- The archaeological potential of the Site is acknowledged and an approach to investigation has been put forwards to tackle this matter.
- The Proposed Development 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 demonstrate 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 conditions 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 wherever possible.
- The Site can be satisfactorily drained, with suitable foul and surface water drainage arrangements proposed as part of the scheme.
- Suitable vehicular and pedestrian access is proposed and the highway serving the Site has adequate capacity to cater for the proposal. 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 highly accessible via non-car modes of transport and as such is well placed to foster its adoption by its occupiers, and improvements to pedestrian footways and a local bus stop have been set out to deliver Active Travel benefits for the locality.
- The Proposed Development is also highly sustainable from a built environment perspective, with a sustainable design & construction approach for the proposed dwellings at the heart of their design.
- The CLS demonstrates that the Proposed Development would not result in negative impacts upon the linguistic and social character of the locality, and indeed that it would deliver key benefits 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 equipped children's play space has been integrated into the Proposed Development that will meet the needs arising from it.
- A contribution toward education provision or other categories of planning contribution is not required.
- The Proposed Development will not cause air quality issues during construction, and neither will it suffer from them from nearby development.
- The Proposed Development is acceptable in all other respects.

6.1.2 To conclude, the Proposed Development would make use of an allocated housing site set within the built form of Bangor to accommodate an affordable housing development. The use of the Site would be in line with the Authority's settlement strategy, and in any case is clearly justified bearing in mind the substantial un-met



need for affordable properties locally. The development would provide a mix of affordable dwellings suited to use by a range of local residents.

- 6.1.3 The submitted plans, DAS, and HIS 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 importantly has accounted for and would respect the value and setting of the Heritage Assets that adjoin the Proposed Development. Whilst there would be an impact upon the setting of Incline Cottage mitigation measures have been incorporated into the design, and this must be balanced against the benefits of the Proposed Development. The density of the scheme strikes a suitable balance between making the best of use of this highly accessible Site whilst taking account of its constraints and the need for open space.
- 6.1.4 The Transport Statement and plans demonstrate that the Site is highly accessible via non-car modes and that suitable pedestrian and motor vehicle access has been proposed together with off-road parking and turning space that would meet the proposal's needs.
- 6.1.5 Detailed technical documents have also been supplied in respect of drainage, ecology & biodiversity, arboriculture, archaeology, agricultural land, and other matters, which should all be read in full, but which demonstrate that the Proposed Development is entirely acceptable in all these regards.
- 6.1.6 As a result, the Proposed Development 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.

