

Strategic Site Engagement in Conwy County Borough by Planning Aid Wales: Llanddulas Quarry Report

1. Background

Planning Aid Wales (PAW) was commissioned by Conwy County Borough Council (CBC) in September 2023 to provide non-statutory community engagement events on the 5 suggested Strategic Sites in the emerging Conwy Replacement Local Development Plan. This report provides a summary of activities undertaken with respect to the Llanddulas Quarry Strategic Site. It summarises the feedback received from local communities who participated in the facilitated events for the site delivered by PAW. This report and all additional comments received by email will be forwarded to Conwy CBC who intend to use the information collected to inform the Deposit Stage of the plan.

As an organisation that supports community engagement in the planning process, PAW only undertakes commissions that:

1. Align with its mission for a fairer, more transparent and more responsive planning system.
2. It believes can add value to a planning consultation / engagement process and will allow more people to have a more meaningful say in that process.

As well as meeting these priorities, PAW particularly welcomes this engagement activity. Whilst there are lessons learned that can be applied to future activities, it goes above and beyond what Local Planning Authorities are required to do in planning regulations - the entire exercise is being delivered in addition to 'statutory' consultations that have and will take place on the Replacement Local Development Plan.

2. Scope & Methodology

This engagement work was intended to explore the views of community representatives on how the sites could be developed in future. The information gathered can be used to inform site specific policies / Place Plans / Site Briefs / Masterplans (or even planning applications) and will inform the production of the Conwy Deposit Replacement Local Development in 2024. The original project scope included the provision of one face-to-face and one online event per site (a total of 10 events) between October and December 2023. Venue availability meant that facilitating all of the events during this period and allowing time for advertising was not possible, and as such it was agreed that some events would be extended into January 2024 and additional events would be provided subject to demand.

The project has attracted substantial feedback on the publicity of the events both from members of the public and their elected representatives. PAW has made every effort to adjust the nature of the activities accordingly and unfortunately, use of existing Local Development Plan contact lists were not possible due to Data Protection reasons. As a result of the above, PAW has undertaken additional works outside of the scope of the original proposal, including preparation and postage of letters to residents close to the site (see section 3, below), and the provision of an additional face to face event in Llysfaen to broaden the reach of the exercise. At the request of a local Elected Member of Conwy CBC, the additional event was arranged in Llysfaen in part to address concerns over parking and accessibility of the Ysgol Llanddulas event.

Both the online and face to face events followed broadly the same format. PAW delivered a presentation and then facilitated audience discussion around a set of broad, overlapping topics. The presentation included information on:

1. PAW's role and the nature of the events.
2. A brief overview of the Local Development Plan (LDP) preparation process, land allocations, candidate sites and how LDPs influence planning application decisions.
3. A recap of activities already taken place on the Conwy Replacement Local Development Plan to date (including the Preferred Strategy consultation in 2019) and the anticipated forthcoming Deposit Plan Consultation in 2024.

4. A definition of Strategic Sites, how they are assessed and selected.
5. The current authority-wide targets (4,300 homes including 700/20% contingency and 1,500 jobs on 16.4ha employment land).
6. A review of the intended site allocation in the 2019 Preferred Strategy and a comparison with the current proposal.
7. Details of the current proposal as follows:
 - a. A new Strategic Site allocation as employment land for a mixture employment uses:
 1. B1 – Business, light industry and startups
 2. B2 – General Industrial, startups
 3. B8 – Storage and distribution
 - b. Relocation of existing waste management facility and new solar farm
The site was submitted as a candidate site but was not allocated as a Strategic Site within the Preferred Strategy.
 - c. The site would include creation of new 'platforms' i.e. infilling of quarry pits to create level ground.
 - d. The site is divided into four 'areas':
 1. Area 1, northernmost part of site that was previously processing area and contains 18th Century Lime Kilns.
 2. Area 2, Northwest, location of current Waste Transfer station, to be relocated to Area 4.
 3. Area 3, Northeast, site of large lagoon / quarry pits.
 4. Area 4, largest and southernmost part of the site, former landfill location (northern part of area 4 currently being remediated).
Potential location for Renewable Energy (solar farms) to service site and target site for relocation of Waste Transfer Station (40-50m below ground level). Existing leachate treatment facilities and composting site to be retained.

PAW addressed procedural questions wherever possible and asked follow-up questions to explore matters further where appropriate, it was also emphasised that any feedback (including questions) gathered would be presented back to Conwy CBC word-for-word.

For the online event, the entire session was recorded and feedback from participants was transcribed. For the face-to-face sessions, participants were provided with physical copies of the site map and discussion prompt sheets and were invited to record their feedback either directly on the sheets or on sticky notes.

Four broad discussion topics were facilitated as follows:

1. **First Impressions**, where initial comments, issues and questions on any topic were invited.
2. **Local Knowledge**, where participants were invited to describe the character of the existing site and its surroundings and share their views on the proposal and impacts in the context of this knowledge.
3. **Site Design**, where participants were invited to consider design implications in relation to access / highways, movement across the site, Active Travel, the form and nature of open space, environmental matters, safety and any potential improvements that would make the allocation better.
4. **Community priorities**, where participants were invited to consider community wants / needs, gaps in provision and any improvements or benefits the site might bring.

A summary of all of the feedback gathered as part of the exercise is presented in part 4, below. Appendix A presents the full feedback as provided at both events. It was also emphasised that further comments could be provided in writing by 19th January 2024, all communications received have been forwarded to Conwy CBC alongside this report. A summary of the additional comments received is provided in Appendix B (NOTE: full comments have not been published in this report for Data Protection reasons).

3. Advertising, bookings and feedback on publicity

With the support of the Strategic Planning Policy Service at Conwy CBC, PAW prepared multi-channel advertising that included:

- Email notices were issued to local representatives according to research across 9 categories (Elected Members, Town and Community Councils,

adjoining councils, local services, third sector organisations, local groups, local business representatives and businesses and 'others' such as local media and hard-to-reach groups). In such instances, PAW was reliant on information publicly available or could be found via internet search.

- Social media posts were issued via CCBCs social media channels.
- Press releases were issued to the local press via CCBCs press team.
- Details were shared on the CCBC website.
- Posters were distributed to appropriate venues e.g. town council halls, churches and shops close to each site.
- Letter mailouts were issued to properties adjoining or adjacent to the sites in question.

Each email notice invited participants to share the invites with their local networks. In some instances, this attracted substantial social media and press attention.

Each notice included a link to an event booking form on the Eventbrite platform which was used for PAW to plan around event numbers.

65 emails¹ were researched and contacted and 143 letters were posted to the properties closest to the site. The bookings generated and the resultant participation for the event is provided below: It should be noted that some participants attended two or more events, and as such attendance figures do not represent unique individuals.

Event	Bookings	Attended
Llanddulas Quarry – Online, 15 th Nov.	10	7
Llanddulas Quarry – Ysgol Llanddulas, 22 nd Nov.	26	37
Llanddulas Quarry – Llysfaen, 23 rd Nov.	32	53
Total:	68	97

¹ 1 Indicates the number of unique email addresses researched for local groups that were publicly available via Google Search. Addresses may have been contacted independently by PAW and Conwy CBC.

Feedback on publicity

Adjustments were made to publicising activities wherever possible as the activities progressed and according to the feedback received from local members and members of the public. This included undertaking postal advertising, which was not originally part of the project scope.

In the case of the Llanddulas Quarry site, letters were sent to 143 properties nearest the site using addresses established using Conwy County Borough Council's online mapping system, prioritising adjoining / facing properties on Dulas Close, Bryn Derw, Ffordd y Graig, Rhodfa Lwyd, Y Gilan, Rhodfa Wen, Copa'r Bryn, Tai Dulas, Abergele Road, Tan yr Allt Road, and Pentregwyddel Road.

It should be noted that unlike a public survey, where the widest possible population is invited to attract a breadth of views, these events were designed to explore and discuss the depth of opinion of the views of community representatives local to the sites. Nonetheless, the main concerns raised included:

- The events were not advertised widely enough and did not reach enough people in time. Several participants reported they had seen an article about the local press in the days leading up to the activity and were concerned that they hadn't been contacted directly – this may account for higher participant numbers than booking numbers. Advertising was partly limited by the timeframes established to complete the project and partly by the limited contacts that could be supplied to PAW. All events were advertised to local Elected Members, Llanddulas and Llysfaen Town Councils, via Conwy CBC's social media channels, via press releases and via local advertising and letter.
- The information provided about the events was insufficient and triggered multiple requests for more information from Conwy CBC and PAW. Whilst every effort was made to be clear about the nature of the events in the initial advertising, many concerns were raised about the lack of information about the proposals on the sites themselves. Whilst it has been emphasised at every opportunity that there is limited information available at this stage of the Replacement LDP process and the aim of the exercise is to inform the subsequent statutory consultation on the Deposit Plan, these concerns

persisted. PAW prepared a 10-page FAQ document about the exercise and distributed event slides after the first event had been delivered on each site as a result.

Based on the above, Planning Aid Wales would make the following recommendations for improving publicity in future:

1. Establish and publicise the scope and limitations of publicity activities at the outset, placing even greater emphasis on inviting community representatives to help 'spread the word'.
2. Allow a minimum 8-week lead-in time for advertising of each event.
3. Ensure a web page is established with all available background information, links to previous exercises and details of how to book into events before advertising is begun.
4. Consider larger / more flexible venues, taking into account proximity to the sites in question.
5. Ensuring the LDP consultation register is available / publicity can take place via the register.

4. Summary of feedback on the Llanddulas Quarry Site

97 participants attended the events and a further 4 individuals forwarded comments by email. In total, each event has been able to generate in excess of 437 individual comments on a wide range of matters relating to local knowledge, site design and community priorities.

It was PAW's impression that the majority (but not necessarily all) participants who attended would likely object to the site were the exercise a formal consultation. Participants who did express support for new housing 'in principle' also expressed concerns about the potential associated impacts.

Whilst the sessions were divided into four broad discussion topics, each topic overlapped with the next, and for ease, the following summary takes into account feedback from all events and discussion topics and has been divided into i). Issues of concern and ii). Mitigations and Improvements to the site.

i). Issues of concern to the community

The following points have been ranked by the number of times referenced by different individuals across all events and additional comments received by email.

This is not an exhaustive list of all issues raised – see appendices A and B for notes of all feedback generated. The most common areas of concern, in order of frequency raised (highest first) included:

1. The appropriateness / suitability of what is being proposed (66 comments)

1. The most common concerns related to the principle of the allocation, the loss of the character of the site (which was meant to be restored), the sheer scale of the site and the nature of the intended uses. At least 30 described the existing character / landscape of the area as quiet, rural, abundant with wildlife and a tourism destination that relies on open countryside. There are multiple footpaths and national walks / paths surrounding the site that are well maintained and used and several comments identified a nearby Site of Special Scientific Interest. Some comments noted that the site may be of archaeological value, with Roman ruins, lead mines, lime kilns and historic tunnels on or near the site. Many identified that there are quiet residential areas in surrounding the site Llanddulas and Llysfaen and there is a play area on Pentregwyddel Road adjacent to the site.
2. Many comments were aggrieved with the proposal on the basis that it was the community's understanding that the site would be remediated / restored and turned over to community amenity once landfill operations had ceased, and that the allocation changes this. Several participants referred to an original agreement made 40 years ago as part of the landfill licence and the fact that this original agreement was not provided in the engagement activity was a particular concern. Several felt that the area had been unjustly focused on for uses like landfill, wind turbines, waste management, composting facilities and this

proposal will further prevent residents from enjoying their surroundings. Others stated there was no justification to move the Waste Transfer Station and questioned why more suitable flat alternatives weren't considered given the need for extensive infilling (one suggested St. George's quarry as being more suitable). Several expressed concerns over a negative impact on property prices in the area as a result of the allocation.

2. The impact of the proposals (56 comments).

1. Many concerns related to the impact the proposal on the area on surrounding residents, the landscape to be restored and local wildlife (many nesting sites were identified – see map below). Many comments focused on the scale and duration of infilling works to create the platforms and level of the ground, with concerns over the dust and noise these works would generate (e.g. heavy plant machinery to process) and the pollution arising from HGV movements to transport materials. Other concerns related to ongoing impacts from the landfill operations, including monitoring Radon and Methane gas and drainage.
2. Several concerns were raised regarding the relocation of the Waste Transfer Station to area 4, which would lead to new and ongoing lorry movements and noise and pollution generation in an area that was originally intended to be restored; some were concerned that the topography of area 4 would mean noise would be amplified. Others were concerned that the compost site already generates smell and whilst the current Waste Transfer site allows smells to be carried away by coastal winds, its relocation would prevent this and odours would be even worse. Some were concerned that by allowing waste operations in area 4, this will attract further 'ugly industries' over time.
3. Others were concerned about the impact of these works on local services (e.g. schools, doctors services) as allowing employment development may lead to housing sites in future. Several referred to the above impacts as being detrimental to the quality of life, mental and physical health of nearby residents. Other comments referred to negative impacts on property and land values of nearby residents and local businesses and tourism would suffer.

3. Better / alternative uses for the site (33 comments).

Many comments referred to a wide range of potential alternative or supplementary uses that would benefit the community with some suggesting that more innovation is needed in this proposal. Some felt minimal changes other than restoration / rewilding are needed for Area 4 and some felt the solar farm was suitable for this area, although others questioned whether the energy generated would benefit the community. Some suggested that given the size of the site, the allocation may be better being subdivided into a smaller set of uses, that might include employment uses (of a start-up scale), retaining areas for nature reserves / rewilding and other uses that would be more suitable for tourism and the benefit of local residents. Suggestions included leisure and recreation uses such as:

- a. Outdoor sports such as rock climbing, mountain biking and the use of the lagoon for diving, watersports or fishing.
- b. More walks / footpaths and parkland
- c. A local history museum to celebrate the history of the quarries, roman ruins, lead mines and villages.
- d. Nature reserves and / or on-site education facilities such as a science and technology centre or environmental projects like the Eden project.
- e. Small industries / startups / local craft businesses.
- f. Cafes / pubs / restaurants

4. Impact on the environment, habitats and biodiversity (25 comments)

1. As identified above, a large number of comments identified the site and its surroundings as habitats for wildlife and a nature reserve should be allocated on the site (some suggested zone 2 as most suitable). Many of these comments identified nesting birds such as peregrine falcons, buzzards and kestrels in particular locations (see map below) and the infilling works and relocation of the Waste Transfer Station would destroy these habitats. Some suggested that an ecological survey was needed and parts of the site should be allocated as a Site of Special Scientific Interest due to the rare species in the area. One identified that solar farms generate radiation and another identified that quarries such as Marford quarry had been left to return to nature.

5. Community engagement has been insufficient (21 comments)

1. Multiple participants expressed concern that this engagement activity did not reach enough local residents and several expressed concern at the events that they had not been directly notified. This was more concerning given the site was effectively a new allocation that had not been identified as a strategic site in the Preferred Strategy. Some were concerned that the level of information provided at the events was insufficient, that facilitators were unaware of the details of the terms of the landfill licence, that another proposal for offshore windfarm cables would affect the site and the plans provided didn't include enough details about existing works on the site. Others were concerned that Conwy CBC officers were not present to ask questions, whilst others felt that this was a 'paper exercise', the form of the events was patronising and local people won't be listened to.

6. Access, highway safety and transport (15 comments)

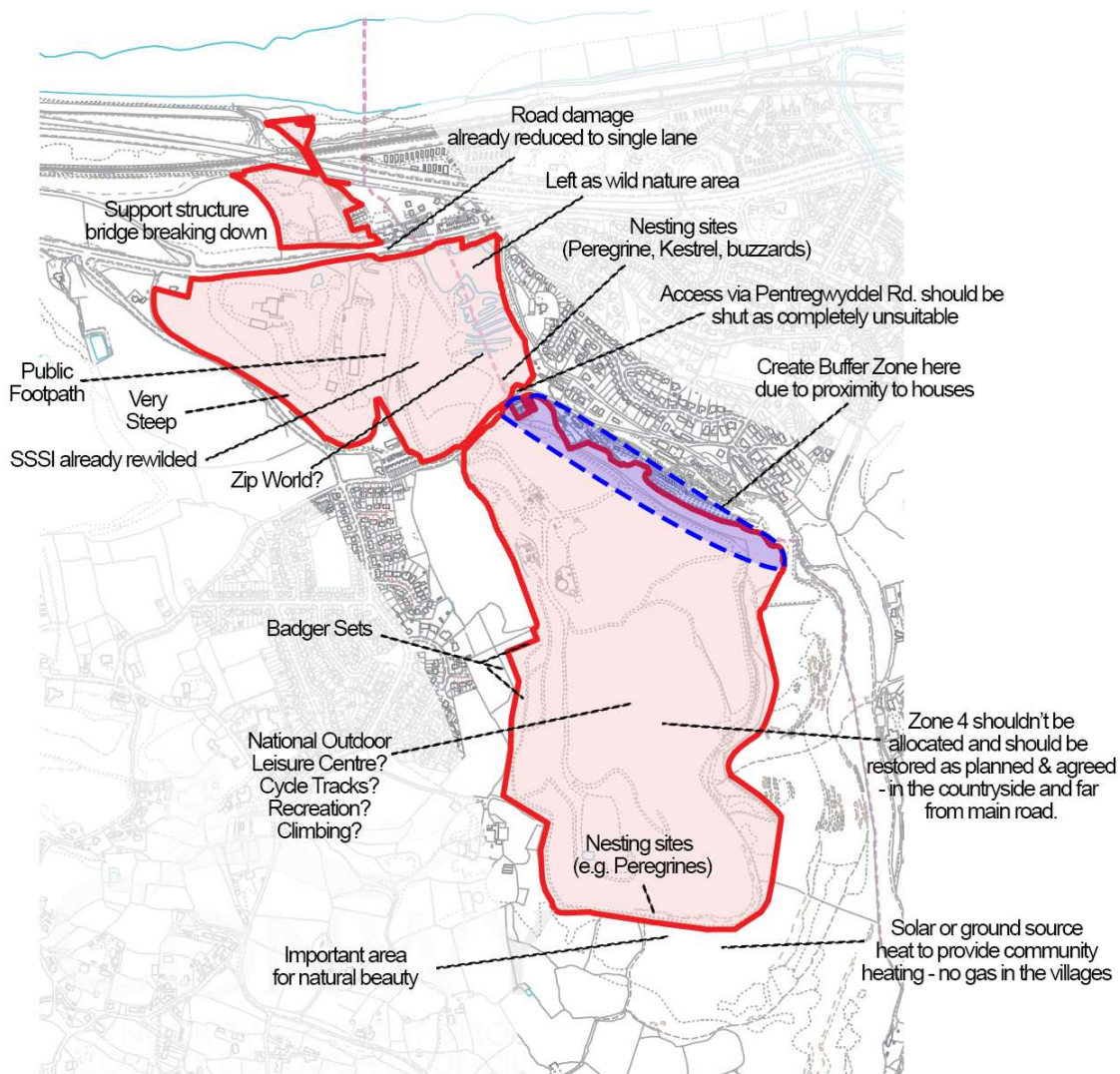
1. In addition to the concerns raised about noise and pollution arising from increased HGV movement as a result of the plans, several comments expressed concerns about access to the site, where it would be situated and the potential impact this may have on local residents. Several identified concerns over existing roadways and bridges being insufficient and access should not be provided via Pentregwyddel Road. Many suggested that uses in Area 4 that required traffic movement should be avoided (e.g. Waste Transfer station) and that areas 1,2 and 3 are more suitable. Public transport in the area was considered inadequate and should be improved.

7. Other comments

1. Community benefits (8 comments). Benefits for local residents (e.g. via Section 106 agreements) were suggested in a variety of forms. Improving existing housing stock, installing solar panels and initiatives to reduce existing energy costs were suggested. Other ideas included regenerating the area, installing

- efficient street lighting, providing playing fields in Llanddulas and providing more housing, supporting local health and education services and providing jobs in the area.
2. Renewable Energy (7 comments). Several felt that any renewable energy generation provided on site should directly benefit the community, although some were concerned over the impact of such schemes in themselves. Some suggested ground source heat pumps should be installed to benefit local residents.
 3. Three other comments were raised regarding land ownership and reiterating objection to any further landfill uses.

Whilst local knowledge was reflected in all of the points raised, participants were also invited to identify matters on physical maps – a composite of multiple maps is provided below that identify existing issues / concerns as well as mitigations and improvements:



ii). Mitigations and Improvements

Whilst many participants felt the principle of the allocation was inappropriate, many were willing to participate in discussions and put forward suggestions relating to the potential design of the site, mitigations against impacts and priorities for the community should the site go ahead. It should be noted that there were fewer comments in these discussions in comparison to the first two discussions and concerns were still expressed about the proposals in some of these comments.

There was broad agreement that the concerns identified in part i) should be addressed fully in the design of the site and full justifications should be provided in the upcoming Deposit Plan regarding all matters raised.

The most common suggestions, in order of frequency raised (highest first) included:

1. Community benefits / Section 106 agreements (28 comments)

1. Many participants felt that if the proposals must go ahead, then local residents should benefit directly and indirectly from the allocations, either through initiatives delivered within the site or by financial contributions that can be made (e.g. to community councils) or be used to improve services and facilities in the neighbouring communities of Llanddulas and Llysfaen. Suggestions included:
 - Providing and improving open green spaces, nature reserves, walks, dog paths with seating and restoring existing footpaths.
 - Community facilities, sports facilities youth clubs and youth activities (e.g. Duke of Edinburgh, Scouts, volunteering opportunities).
 - Providing environmental education facilities.
 - Community energy projects / discounted energy bills
 - History and heritage facilities / schemes to celebrate the area
 - Improving existing housing stock – solar panels, double glazing, new boilers etc.

- Improving Clobryn Road and providing more rubbish collections

2. New tourism / leisure / recreation facilities on site (25 comments)

1. As an extension to point 1, a wide range of comments reference specific leisure and recreation uses for the site that would benefit tourism and local residents. It should be noted that these should be provided in place of or at the least as a supplement to the current proposed uses. suggestions included:
 - Sports and recreation centre / facilities – skate parks, BMX tracks, dirt bikes, go karts, ZipWorld over the lagoon, rope courses / adventure park.
 - Outdoor sports such as rock climbing and watersports facilities
 - Environmental facilities and activities like the Eden project, forest schools, community bee hives, nature trails and walks
 - Heritage and education facilities that celebrate the Lime Kilns and archaeology of the site.
 - Community solar farm / battery storage / renewable energy

3. Alternative uses (22 comments)

1. Some comments suggested that the proposed uses should not go ahead or should be much more restricted and the following uses should be prioritised:
 - Nature reserves Wildlife protection / green spaces / back to nature
 - Restoration to green / open countryside and rewilding
 - Non-intensive light industry
 - Leisure / tourism uses (as above)
 - Allotments
 - Rescue training facilities

4. Site design / mitigations (14 comments)

1. Some comments suggested area 4 should have minimal development to limit impact on residents (after restoration). As a principle, all activities should be kept as far as possible from existing housing and buffer zones in the form of

shrubbery and bunds should be used to screen the site from residents (see map) as well as public rights of way.

5. Mitigating traffic impacts (12 comments)

1. Several comments reiterated concerns over the impact of access and traffic and this should be mitigated against in the design of the site, especially access to area 4. More details on road layouts would be needed for reasonable comments to be made and several expressed concerns over existing road conditions as well as potential new roads. One identified that emergency service access is essential and not sufficient to serve the site at present.

6. Other comments

1. 12 comments reiterated fundamental objections to the principle of the allocation on the basis of the need to restore the site after landfill and no other action should be taken. Several questioned whether appropriate assessments had been undertaken to justify the allocation (environmental / ecological / quality) and some felt the site should be established as an Area of Outstanding Natural Beauty and the relocation of the Waste Transfer Station is inappropriate.
2. 9 comments reiterated concerns over dust, odours, 24hr noise disturbance, radon gas, leachates and pollution and some of these asked for more information / justifications on these matters. One requested improved boundary fences to protect children from climbing over.
3. 7 further comments were made stating that any renewable energy provided within the scheme should benefit the local communities.
4. 6 comments were made identifying the opportunities to provide active travel / cycle routes through and around the site and to improve cycle access in the area more generally.

Conclusions and Recommendations

Of the 97 participants in this exercise, it is clear that there are strong concerns about the principle of the proposed allocation, the loss of a to-be restored landscape and the impact of not only the intended uses, but also the works required to restore the site. Were the site to go ahead, a wide range of suggestions to make the site better and to benefit existing residents have been put forward.

It is recognised that the participants represent up to 3.4% of the total populations of Llanddulas and Llysfaen and in that regard, the results of the exercise cannot be taken as either statistically significant or a representation of the views of those who did not participate. However, given the frequency and commonality of the issues raised independently at events, it is possible similar issues may be reflected in a wider engagement exercise.

The issues identified by the community within this report (both in the body of the report and the Appendixes) are submitted to Conwy CBC for consideration as they prepare the Deposit Plan; at the least, PAW recommends that all of the issues raised are addressed, justified and clarified in the Deposit Plan consultation, and ideally a response is prepared to the issues raised and circulated back to those who participated and published on their website. In terms of the forthcoming consultation, PAW also suggests that the recommendations in section 3 are taken into account when planning and publicising the Deposit Plan consultation exercise.