

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

Llanfairfechan Report

1. Background

Planning Aid Wales (PAW) was commissioned by Conwy County Borough Council (Conwy CBC) in September 2023 to provide non-statutory community engagement activities on 5 Strategic Sites in the emerging Conwy Replacement Local Development Plan. This report provides a summary of activities undertaken with respect to the Llanfairfechan 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:

- Align with its mission for a fairer, more transparent and more responsive planning system.
- 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 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).

Both the online and face to face event 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:

- PAW's role and the nature of the events.
- A brief overview of the Local Development Plan (LDP) preparation process, land allocations, candidate sites and how LDPs influence planning application decisions.
- 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.
- A definition of Strategic Sites, how they are assessed and selected.
- The current authority-wide targets (4,300 homes including 700/20% contingency and 1,500 jobs on 16.4ha employment land).

- A review of the intended site allocation in the 2019 Preferred Strategy and a comparison with the current proposal.
- Details of the current proposal as follows:
 - A reduction in the overall area of the site since 2019
 - A reduction in the anticipated number of homes from 450 to 100-150 new homes, to including affordable housing.
 - No new school on site, although Llanfairfechan remains a priority for school provision and mitigations (commuted sum and land if needed) will be sought from developers
 - Intention for open space provision to be defined.

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 session, 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, and 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.

A total of 69 emails¹ and 125 letters were sent. A summary of the bookings generated and the resultant participation for the Llanfairfechan site is provided below:

Event	Bookings	Attended
Llanfairfechan – Online, 20 th Nov.	18	15
Llanfairfechan – Community Hall, 7 th Dec.	40	35
Total:	58	50

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 Llanfairfechan site, letters were sent to 125 properties nearest the site using addresses established using Conwy CBC online maps, prioritising adjoining / facing properties on Llannerch Road., Aber Road, Bont y Castell, Terrace Walk, Pen y Bryn Road, Bryn Rhedyn, Llwyn Gwgan, Llwyn y Gog, Bryn Castell and Gwyllt 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, concerns were raised during the project that:

- The events were not advertised widely enough and did not reach enough people in time. This was partly limited by the timeframes established to complete the project and partly by the limited contacts that could be supplied to PAW and the tenant's concerns were addressed by Conwy CBC directly.

All events were advertised to local elected Members, Llanfairfechan Town

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.

Council, via Conwy'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 about the sites 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.
6. Several participants in Llanfairfechan suggested that young people in the area should be engaged in the process.

4. Summary of feedback on the Llanfairfechan Site

50 participants attended the events and a further 9 individuals forwarded comments by email. In total, each event has been able to generate in excess of 323 individual comments on a wide range of matters relating to local knowledge, site design and community priorities.

It was PAW's impression that many (but not all) participants who attended would likely object to the site were the exercise a formal consultation, and in fact, several subsequent letters received identified they were objections. Participants who did express support for new housing 'in principle' also expressed concerns about the justification of need and 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.

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.

NOTE: 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 the site.** The most common issue was whether this site is needed and could be justified given the decline in the population of Conwy County Borough. The loss of agricultural, greenfield land / country park land was a key concern, including the loss of grazing land, trees and hedgerows. This was not unanimous, as some felt that the site seemed suitable for development. Many felt that alternative sites, including brownfield sites and empty properties had not been adequately considered and gave

suggestions such as the Heath, the old factory and the old butchers. Concerns were raised about the number of new people coming into the area (suggesting a population increase of 15%) would result in the loss of Llanfairfechan's quiet village identity and dilution of the Welsh language and sense of community. Others expressed concern that allowing this may be a starting point for further development spreading out from the site. Some identified existing features like an ancient well and bunker should be protected and others were concerned about the disruption throughout construction and the safety issues arising due to the proximity of the local hospital.

- 2. The impact on existing infrastructure & services.** There seemed to be consensus across all sessions that existing GPs, schools and other local services were already struggling and the new development would add unjustifiable additional pressure to these services. Several comments related to concerns about the need for a new school as the existing primary school was deteriorating and over-capacity and others were concerned that the loss of the new school from the original plan was not justifiable. Many identified pressures on a range of health services (GPs, practice nurses, pharmacies, care agencies) such as excessive waiting times and shifting the onus to the Health Board is not acceptable. Some identified a gas main and drains crossing the site and pressure on utility services would increase. Increasing pressure on fire and police services were also identified.
- 3. The nature of the housing and the need for Affordable Housing.** There was also strong consensus that housing should meet the needs of the population of Llanfairfechan and providing affordable housing should be the highest priority. Several participants independently suggested the site should be a minimum of 80% affordable and that what is actually affordable should take into account local incomes and include social housing (although others were concerned about safety and land values). Others expressed concerns over the proliferation of second homes, holiday homes and AirBNB properties and this should be restricted and what houses are built should be solely for people in Conwy County Borough or adjacent counties.

4. **Traffic, highway safety and public transport.** Concerns over the implications of the development on traffic were common, as was how the site should be accessed. Many stated there would be an increase in traffic, congestion and pollution and there would be increased risks to pedestrians. Others identified specific issues with traffic on Llys-y-Coed, Pendalar roundabout and access to the A55. Some had concerns about road maintenance and others identified public transport options were lacking, thereby adding to the increased car traffic from the site.
5. **Flooding, drainage and water treatment.** Several participants mentioned existing and past flooding occurrences on and near the site and that the loss of flooding and drainage concerns about the site would exacerbate this situation. Cae Ffynnon, which is translated as 'well field' regularly has water runoff that would be interrupted by the development and works to improve drainage on Aber Road has been insufficient. Others expressed concerns about sewage treatment capacity at Glan y Mor Elias and the likelihood of sewage reaching the sea or affecting the nature reserve. Others noted the likelihood of increased surface water run off was high and there was uncertainty as to whether Sustainable Urban Drainage Systems would be sufficient to manage.
6. **Impact on the environment.** Some participants questioned whether a Biodiversity Impact Assessment had been undertaken and others emphasised the proposal would likely result in the loss of habitats, trees and hedges which would result in the loss of wildlife. Wading birds of the Traeth Lafan protected area were identified as using Cae Ffynnon as a high tide feeding area. The loss of trees was referenced multiple times as a concern, and several referenced the need to retain the large Oaktree in the site. Some identified the loss of trees would exacerbate flooding issues identified above, whilst another noted that any trees lost should be offset by new planting elsewhere.

Other issues raised including the need to provide cyclist / pedestrian access at the West and Aber Road should be used as a quiet road for walkers, cyclists and

joggers. Other participants suggested that engaging young people in schools should be a part of the exercise.

ii). Mitigations and Improvements

Whilst several participants questioned whether the allocation was appropriate, 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.

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. **Affordable Housing / Local Needs Housing.** The provision of affordable housing at the highest possible level was the most comment theme in the discussions. Many felt the housing provision should meet local needs (e.g. young people, young families & retirement bungalows), include a mix of social, private rent and market properties that are 'actually' affordable, although some were concerned about the impact of low-cost housing on existing residents. A range of thresholds for sale price (e.g. £150k-£200k) and the ratio of affordable housing (40-80%) were suggested. Some suggested that the affordable housing be built before other properties to guarantee they are built, whilst others asked that locals be given preference e.g. by specifying minimum occupancy in the area (1-5 years) in efforts to protect the Welsh Language. Another suggested that the site be removed in favour of re-using empty properties / homes, identifying that there are 28 empty properties and 65 second homes in Llanfairfechan. Several suggested that restrictions / covenants be put in place to prevent the use of the properties as holiday homes / second homes / AirBNBs.
2. **Access, Parking, Highway Safety & Public Transport.** Suggested mitigations included providing access via mini roundabouts, ensuring ample road width, safe pedestrian access and the provision of ample parking and guest parking through

the site (and making all parking spaces water permeable). Connectivity to the existing centre via walking and cycling was suggested, and implementing extended low mph speed limits and restrictions (e.g. speed bumps) and a one-way system through the town centre was proposed. To limit congestion, one suggested the site should be directly connected to the A55. Several suggestions included the need to provide better public and / or community transport and ensuring the site is well served with bus stops and a park & ride scheme to reduce reliance on cars; this included a suggestion to require each house to be fitted with e-charging points.

- 3. Nature Protection and Green Infrastructure.** Several suggestions were made to preserve and protect the existing trees on the site and it was identified their current positioning were ecologically important and would act as a natural buffer to the site. The single Oak tree in the centre of the site should also be protected and steps should be taken to protect hedges, bats, birds and nesting sites to protect biodiversity. Several suggested that green spaces are important and that there is a large waiting list for allotments in the area – allotments should be provided within the site to meet local demand.
- 4. Infrastructure and local service provision.** Suggestions included resourcing infrastructure and facilities, including health services (i.e. creating a health centre / surgery and providing for GPs), policing, ensuring adequate sewerage treatment, providing sufficient / appropriate lighting. It was re-emphasised that the current school was not fit for purpose and a new building is necessary. It was also emphasised that community meeting space was necessary although there were mixed views as to whether a new community centre was needed or whether the existing Community Hall should be improved. A youth club and/or places for young people to go was also suggested.
- 5. Site & Building Design.** Several participants expressed a desire for the site to be designed in a way that was architecturally sympathetic to Llanfairfechan, (such as requiring slate roofs and Welsh Road names) and be future-proofed. The site should include green spaces, ponds, play areas, green frontages and

ideally should include a shop or café to help with social cohesion. Creation of natural drainage and Sustainable Urban Drainage Systems should be prioritised to reduce runoff. Buildings should be designed to be energy efficient and meet BREEAM standards, although it was noted that the mountain might limit building orientations for solar panels; some suggested EV charging points be provided. The properties should have sufficient space and gardens for children to play, and safe, accessible playgrounds / play spaces for all ages should be provided, along with open space, wildflower / tree planting and community gardens and allotments.

6. **Active Travel.** Several suggested that there be appropriate and safe pedestrian and cycle access to, from and within the site into the town centre / to schools. Whilst some felt that ample parking should be provided, others suggested limiting parking to discourage car use and encourage cycling, walking and use of public transport.

Other matters discussed including Section 106 agreements. One comment suggested that a holistic view that looks beyond the site and that the site should provide a local school thereby releasing other sites. Other comments suggested that Section 106 monies be ringfenced for use in Llanfairfechan only and one suggested that the monies be used to facilitate conversion of the Heath to one-bedroom flats. One suggested that Section 106 require a local occupancy clause. Others took the view that the proposal could only be improved by not building houses at all.

Llanfairfechan Town Council worked with the community in the previous year to identify what broader community priorities were as part of a 'Kickstarter Place Plan' exercise, and participants agreed these priorities should be considered as part of this LDP process. That activity attracted 227 participants who identified activities / facilities for young people, a community energy scheme, improved access to GP / health facilities, better parking in town (free parking on prom car park) and the reuse of empty properties and shops as priorities.

5. Conclusions and Recommendations

Of the 59 residents of Llanfairfechan who participated in this exercise, it is clear that there are strong concerns about the principle of the proposed allocation as well as the potential impact on existing services, transport infrastructure and flooding. Were the site to go ahead, the provision of affordable local needs housing was the most common issue raised.

It is recognised that the participants represent 1.55% of the total population of Llanfairfechan 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 appendices) 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.