

Strategic Site Engagement in Conwy County Borough by Planning Aid Wales: Llanrhos 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 Llanrhos 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 have been 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), and the provision of an additional afternoon event in Llanrhos.

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, removing portions from the West, Southwest and Southeast of the original allocation.
 - A reduction in the anticipated number of homes from 250 to 100-150 new homes, to including affordable housing.
 - Removal of an intended 1ha office space allocation.
 - No new primary school on site as originally proposed, but mitigations to extend capacity in Ysgol Deganwy as a priority (commuted sum and land if needed) will be sought from developers.
 - Inclusion of 'buffer zones' to separate site from surrounding properties / businesses, in locations to be defined.
 - Active travel, public open space, and allotments 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 from participants 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 31st 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 (Elected Members and Town and Community Councils).
- 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 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.

Given the predominantly residential nature of Llanrhos and the limited number of email addresses available online, a leaflet drop was conducted to every residential property and business within the vicinity of the site in lieu of email advertising, which was limited to local elected members. A total of 334 letters were hand delivered or sent by post. A summary of the bookings generated and the resultant participation for the Llanrhos site is provided below:

Event	Bookings	Attended
Llanrhos – Online, 20 th Nov.	16	13
Llanrhos – Old School (x2), 23 rd Jan.	92	62
Total:	108	75

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 Llanrhos site, letters were hand delivered or sent to 334 properties nearest the site using addresses established using Conwy CBC online maps, prioritising all residential properties to the North of the allocation within Llanrhos (Conway Road, St. Anne's Gardens, Bryn Lupus Road, Parc Lon Pedr, Grange Road, Hill View Road and Bryn Lupus Drive), business addresses to the immediate South and Southwest of the site, and facing properties on Maes y Castell and Deganwy Road to the West of the site.

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. All events were advertised to local elected Members, Conwy Town Council, Llandudno Town 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.

4. Summary of feedback on the Llanrhos Site

75 participants attended the events and a further 9 individuals forwarded comments via 13 emails. In total, each event has been able to generate in excess of 627 individual comments on a wide range of matters.

It was PAW's impression that the majority (but not all) participants who attended would likely object to the site were the exercise a formal consultation. Several subsequent letters received identified they were outright objections. Some participants at events were unwilling to participate in discussions around site design and community priorities on the principle that they fundamentally objected to the scheme. Participants who did express support for the new housing also identified some technical matters that would need to be overcome.

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. Appropriateness, impact on Green Wedge and deliverability. (118 comments)

A vast majority (although not all) comments objected to the proposal, describing the negative impact it would have on the existing character of Llanrhos. Many described the allocation as inappropriate, undeliverable, and that changes to the Green Wedge to accommodate the proposal could not be justified. Key themes were as follows:

- 1.1. The existing character of Llanrhos is a village / hamlet with a high proportion of retired residents that benefit from a historic landscape; many felt this character and identity would be lost if the proposal went ahead. Local features, heritage, and landmarks like the Vardre, Deganwy Castle, Bryniau Tower, Tyn y Coed House, Bodysgallen Hall, Maelgwn Hall, existing public rights of way and green spaces form part of Conwy Special Landscape Area which is valued by the community and tourists. These would be negatively affected by the new development and valued green open space and working agricultural land would be lost. Several referred to recent planning applications had been rejected due to visual impact and impact on open countryside.
- 1.2. Many (but not all) called for the allocation to be removed as it was against the wishes of the community. Several stated the size of the allocation was out of proportion with the area, represented overdevelopment and the location is out of town with no access to facilities and is therefore unsustainable. Many questioned whether there were sufficient employment opportunities for the influx of new residents; most would likely need to commute worsening local traffic and highway safety. Others questioned the need for the numbers of houses, particularly in the context of the population of Llanrhos. Several noted the absence of any reports to justify such a large increase in the size of Llanrhos, and that no detailed assessments of suitability have been made

available in the context of agricultural land classifications, visual impact, ecology, flood risk, environmental and social impacts.

- 1.3. At least 24 comments stated the Green Wedge should not be modified, with several noting that the allocation would lead to urban sprawl, a loss of separation and coalescence between Llanrhos and Deganwy. Many felt that allowing a modification to this historic protection now would mean that future modifications would be easier and would lead to further sprawl to Llandudno. Some felt that absolute guarantees that no further modifications would happen to the Green Wedge was critical.
- 1.4. Others questioned whether the site was deliverable. Multiple concerns were raised over land ownership of the site, whether all landowners were willing for development to happen and some reported that covenants on the northern part of the site would prevent any development from happening.
- 1.5. Some comments expressed support for the proposal (subject to concerns being addressed), identifying that housing was needed for young people in the area and that an appropriate mix of housing including market housing is needed to make it viable.

2. Access, Traffic and Highway Safety. (76 comments) Many comments expressed concerns that the new housing would result in an additional 200-300 new cars (estimate range in comments) that would add pressure to existing road networks, create additional pollution and negatively affect the safety of drivers and pedestrians. The location of the site, the lack of local amenities and employment opportunities would mean that new residents would be reliant on cars, and local public transport was not frequent or affordable. Many comments noted a lack of any detail on access points or traffic assessments with the proposal as particular concerns. Some identified that Bryn Lupus Road and Pentywyn Road are busy at peak times, whilst many identified concerns over how the site would access Pentywyn / Conway Road, which already has a number of junctions and is a fast and dangerous road (one comment noted over 625 speeding offences were recorded here in the 11 months to November 2021). Others noted that recent housing developments had led to an increase in traffic and other applications had been rejected in the area on highway safety grounds. Others felt that improvements to road infrastructure to accommodate the development were not possible, although another noted that 200+ cars would not be on the road at the same time, traffic flows are generally low and car pollution is decreasing year on year due to advances in emission management technology.

3. Impact on local services / infrastructure (52 comments). Many expressed concerns that existing services were already under substantial pressure and would

be unable to cope with the influx of new residents. Many comments referred to local GP surgeries being at breaking point and were unable to recruit new GPs. Others noted it was not possible to register for NHS dental treatment and access to hospital and treatments was already poor. Others felt this issue was being ignored by Conwy CBC through the planning process. Several comments questioned the capacity of Deganwy School both in terms of physical space and financial resources to support influxes of new pupils arising from the development – some stated the school was full but others identified that pupil numbers are in decline. Others referred to crime and the capacity of local police services as a concern.

4. Other impacts (46 comments).

- 4.1. At least 13 comments referred to the impact of the proposal on Maes Dolau Caravan Park. Comments identified that the housing would negatively impact the outlook from the site, would likely deter customers and would impact the privacy, security and quiet enjoyment of the site for existing caravan owners. This would be particularly exacerbated at the main access to the site and the increase in use of the footpaths running through the site was also a concern. The impact of the construction of the houses was also identified as problematic and would negatively impact the business. The owners of the caravan park have asked it to be noted that they have and will continue to raise fundamental objections to the proposal and will not sell any part of their site to facilitate this or any future development.
- 4.2. The wider impact on tourism in the area was identified several times in the context of the loss of landscape and impact on the Green Wedge.
- 4.3. Potential impacts on residential properties and the surrounding area were referenced and included increased vandalism / crime, noise and light pollution and a potential decrease in property values.
- 4.4. Others expressed concerns that the increase in population would dilute the Welsh Language.

5. Flooding / drainage (45 comments). Many comments reported instances of local flooding that would be worsened by the addition of new non-porous surfaces on the site and increased runoff. Specific flooding locations were identified including the field to the North of the caravan park by Bryn Lupus Road, and photos and videos were submitted showing flood occurrences at Maes y Castell, Bryn Maelgwyn Lane, and Lon Pedr. Several identified that flooding occurrences are to increase as a result of climate change, with some noting recent developments had made the situation worse. Others identified that no improvements had been made to local drainage as a result of recent developments and that drainage capacity needs to be

addressed before any further housing is added. One stated that the costs of delivering on-site solutions would mean affordable housing would be reduced whereas another stated that localised flooding clears quickly although an acceptable plan for drainage was needed before the development to ahead.

6. Nature of housing / affordable housing (29 comments). Several comments questioned what mix of housing would be provided and the percentage of social and affordable housing to be provided. Several concerns were raised over only providing expensive market housing and large family homes, with some feeling that this would only be suitable for people moving into the area. Some identified that the local area needs affordable housing, bungalows for older people and smaller properties for younger people, although others had concerns about the impact social housing and blocks of flats would have on existing residents. Others questioned whether affordable housing would be delivered at all, numbers would be reduced by developers or values would increase making them unaffordable. Others did not want second homes.

7. Community engagement (16 comments) Comments expressed concerns that this and past community engagement activities on the site have been inadequate, feedback has not been forthcoming and community voices are not listened to, making the exercises futile. One comment noted that 1,132 comments were made on the Preferred Strategy and another noted that the Representation Report did not justify why representations were not accepted. Several felt that Conwy CBC misled the community in the previous consultation and promises about providing a new school had been broken. Others felt that publicity for meetings like this should be better and that planning officers should have been at events to answer questions. Many were concerned with the lack of background information being supplied with these events. One comment questioned whether a low turnout at the events indicated indifference to the development.

8. Other comments

8.1. **Alternative / brownfield sites.** 15 comments questioned why alternative sites had not been considered, with many suggesting brownfield sites with better access to amenities and in particular the reuse of existing empty buildings. Suggestions included Robertson's, the Kinmel side of the station / Brenig site, empty commercial properties in Llandudno. Others were concerned that the Builder Street site had not been completed.

8.2. **Impact on the environment / biodiversity.** 11 comments identified the potential ecological impact of the loss of the fields, specifically the loss of

plant life and habitats of foxes, moles, squirrels, woodpeckers, owls, pheasants, newts, frogs, hedgehogs, bats, sparrowhawks, reptiles and insects.

- 8.3. **Active Travel.** 7 comments identified that existing public footpaths (particularly 10/9 and 10/10) needed to be maintained (or upgraded) to allow safe access and use by residents.

ii). Mitigations and Improvements

Whilst a majority of participants questioned whether the allocation was appropriate, some (but not all) 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.

Some comments reiterated concerns expressed in earlier discussions and others felt that nothing would improve the proposal. Some felt 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 priorities, facilities, and spaces / improvements (49 comments). Several comments referred to spaces that would benefit existing residents, be innovative in bringing people together and contribute to well-being (although others suggested that retaining the site as is would also do this). Suggestions included:

- i. Community hubs / Cafés / Community centre, meeting spaces, community gardens – community focal points
- ii. Health hubs, doctor's surgery, and dental health hub
- iii. Shops and small business units
- iv. Pubs
- v. Allotments (although this wasn't unanimous)
- vi. Play areas and dedicated open spaces for young people (but not just toddler play parks), sited in the centre of site where it can be overlooked / supervised.
- vii. Nature, mature habitats, green areas / fresh air. Biodiversity improvements and tree planting.
- viii. Make it something special – low carbon, maximum biodiversity, maximum community benefits, green corridors.
- ix. Better public transport that is affordable for parents and children. Reduce reliance on cars
- x. Active travel infrastructure for walking and cycling
- xi. Landscape viewpoints.

- xii. Better infrastructure / drainage. Such things should not be contingent on housing being built.
- xiii. Guaranteed protection of remaining green spaces / Green Wedge and area to West of site.
- xiv. No housing, agricultural land, retain Green Wedge.
- xv. Celebrate the history of the area.

2. Mitigating access / highway safety / transport concerns. (26 comments).

Whilst many felt that highway safety implications of the site could not be improved, others requested more information about access points and that traffic impact assessments are provided. Some made suggestions about mitigations including addressing speeding, poor pavement access, reducing pollution and widening Bryn Lupus Road. Others identified that existing bus services are expensive and better public transport services were needed.

3. Site Design matters (25 comments). Some comments suggested a need for innovation in design of the site and the housing:

- i. Making it different to other developments / think outside the box.
- ii. Mixed uses would be better.
- iii. Complement / celebrate local heritage / landscape.
- iv. Reduce the number of houses / aim for lower density.
- v. Provide ample parking and avoid narrow streets (others suggested reducing reliance on cars).
- vi. Ensure housing is energy efficient / meets BREEAM standards.
- vii. Address existing flooding / drainage issues.
- viii. Sustainable Urban Drainage Systems are needed.
- ix. Provide quality amenity space and a community hub / focal point / meeting space.
- x. If family houses, prioritise play parks over allotments.
- xi. Areas to buffer the site from its surroundings attracted mixed comments – some suggested screening near the Caravan Park and St. Anne's Drive, but others had concerns over whether they will be provided and the loss of light that might result from screening. Several agreed that land to the West of the site should be retained and protected from future development.
- xii. Others questioned whether the land will be levelled and whether the development would happen in stages.

4. Active Travel (9 comments). Several comments raised concerns about the maintenance and improvement of public rights of way and some questioned why

the area was not on or connected to Active Travel Maps. Some questioned whether the area was suitable for improvements. Suggestions included:

- i. Better accessibility for walkers and cyclists.
- ii. Better / safer connections between Llanrhos and Deganwy School and Llanrhos store.
- iii. Do something Beyond just a 'nod' to the environment.

5. Provide more information / justifications / assessments (6 comments).

Comments related to further information and justifications being provided, including impact assessments for the following:

- i. Traffic Impact Assessments
- ii. Environmental Impact Assessments
- iii. Habitat / Ecology Assessments
- iv. Flood Risk Assessments
- v. How the proposal meets national policy – e.g. LDP manual states development should be capable of being delivered.
- vi. Suitability assessments in the context of agricultural land classifications, visual impact, ecology, and social impacts.

6. Other matters.

- 1.1. 7 comments referred to a range of safety concerns, reiterating lack of pavements and highway access concerns. Others were concerned about crime and noted that the previously proposed skate park was upsetting.
- 1.2. 3 comments referred to the impact of construction (e.g. noise) on nearby residents and suggested setting construction site operating times and ensuring access / traffic through Llanrhos was not impacted by construction.
- 1.3. 2 comments referred specifically to Section 106 agreements. One identified that moneys should be put towards local services, whereas the other suggested funding is unlikely to be forthcoming due to the scale of the development and it being staged over several years.

5. Conclusions and Recommendations

Of the 75 event participants and 9 people who submitted additional comments, it is clear that the majority had fundamental objections about the principle of the proposed allocation and the impact on the Green Wedge, as well as concerns over a wide range of impacts associated with the allocation, although it is noted that these concerns were not unanimous.

It is recognised that the participants do not comprise the total population of Llanrhos 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.