
Land at Cae Stanley Bontnewydd Planning Statement

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Kingscrown Land & Commercial Ltd (the Applicant) in a support of a full planning application for residential development comprising 24 dwellings, arranged as a mixture of one and two bedroom cottage flats (Class C3), including car parking, landscaping and a new access ('the Proposed Development') on 1 acre of land off Cae Stanley, Bontnewydd, Caernarfon ('the Application Site').
- 1.2 The application is driven by the desire to utilise and develop an allocated greenfield site within a predominantly residential area for housing and to help to diversify the housing stock.
- 1.3 This Planning Statement provides a background to the Proposed Development, covering the Application Site and its surroundings, the policy context and the technical assessments. These assessments have considered the potential effects of the Proposed Development upon the Application Site and its surroundings.
- 1.4 The Planning Statement has been prepared to assist Gwynedd Council (the Local Planning Authority) in its determination of the application and should be read in conjunction with the suite of supporting material.
- 1.5 The structure of the Planning Statement is as follows:
- Introduction;
 - Application Site and Surroundings;
 - Pre- Application Consultation;
 - Proposed Development;
 - Planning Policy Context;
 - Compliance with Planning Policy;
 - Technical Considerations; and
 - Conclusions.
- 1.6 A number of technical reports have been prepared in support of the application and should be read in conjunction with this Planning Statement:
- Design and Access Statement;
 - Flood Consequence Assessment and Drainage Management Plan;
 - Ground Engineering Desk Study;
 - Landscape Plan;
 - Preliminary Ecological Appraisal;
 - Transport Statement; and
 - Tree Survey and Arboricultural Impact Assessment.
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2.0 Application Site and Surroundings

- 2.1 The Application Site covers an area of approximately 1 acre and is located off Cae Stanley in Bontnewydd, Caernarfon.
 - 2.2 The Site is composed of vacant grassland used for grazing. The site is surrounded by grass and agricultural land to the east; Cae Stanley borders the Application to the south with residential housing beyond that. The site is bound by the Afon Beuno to the north and west, with residential housing beyond that.
 - 2.3 The site sits within an area of mixed character with various architectural designs and periods of construction in Bontnewydd. There are a range of material palettes used within the village, from brickwork, to render and pebble dash. There is not a precedent design style or type of construction that dominates the landscape or village.
 - 2.4 The surrounding townscape contains a mix of uses, including residential, industrial and commercial uses. The surrounding area contains a mixture of one and two storey developments, with the Application site set back from the surrounding land uses by the road and Afon Beuno.
 - 2.5 The site sits within a sustainable location with good access to public transport facilities and the wider highway network via Pwllheli Road to the west.
 - 2.6 Pwllheli Road is a major bus route into both Caernarfon and Pwllheli with a service every 30 minutes to Caernarfon and a service every hour to Pwllheli.
 - 2.7 Since the closure of Bontnewydd station the nearest train station is in Caernarfon. Caernarfon Station is the northern terminus of the narrow-gauge Welsh Highland Railway, this provides links to Beddgelert and Porthmadog. Bangor is the nearest train station with commercial trains into Anglesey, Liverpool and Chester.
 - 2.8 The Application Site is allocated for residential development within the Gwynedd Joint Local Development Plan (Ref. T60).
 - 2.9 The site contains no statutory environmental, ecological, landscape or heritage designations.
 - 2.10 The Application Site is moderately level with a general fall to the north and west towards the Afon Beuno.
 - 2.11 Vehicular and pedestrian access is currently taken from an access point outside the Application Site to the east, on Cae Stanley.
 - 2.12 The Application Site lies mainly within Flood Zone 1, but part of the site to the north west lies partially within Flood Zone 2 and 3.
 - 2.13 The site has no planning history.
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3.0 Pre-Application Advice and Community Consultation

Pre-Application Advice

- 3.1 A request for pre-application advice relating to the development of 28 cottage flats on the Application Site was made to the Council in June 2022.
- 3.2 A written response was provided by Keira Sweeney on 01/09/2022. The pre-application response considered relevant planning policy and how the Proposed Development can address policy requirements in relation to the housing mix; layout and design; planning obligations; landscaping; and parking requirements.
- 3.3 The response considered that the principle of residential development was acceptable, owing to the site's allocation for residential development within the JLDP.
- 3.4 The response raised some concerns with flooding on part of the site, whilst also noting that the settlement has seen its expected level of growth through completed units in the period 2011 to 2020, thus justification will be needed with the application outlining how the proposed development and Bontnewydd will meet the need of the additional 24 units.
- 3.5 The Proposed Development has taken into account this pre-application response when reviewing and redeveloping the planning proposals. The revised proposals include a reduced number of units a larger affordable housing provision and a development platform well outside of the flood zone.
- 3.6 The Application is also supported by a Housing Statement to demonstrate the demand for additional housing, above the allocated provision, within Bontnewydd.
- 3.7 It is hoped that this planning statement and the supporting drawings and documentation demonstrate that the proposed scheme demonstrates sustainable development and should be supported.

Community Consultation

- 3.8 Community consultation will be undertaken as part of the Pre-application consultation (PAC), to allow for comments upon the draft proposals from Statutory Consultees and those adjacent residents within an influencing distance of the Application Site.
 - 3.9 A letter outlining the proposals will be delivered to properties within close proximity to the Application Site, with a link on to the consultation web page to allow residents to make comments and recommendations. A copy of the proposals were also sent to local councillors, community groups and members of the Planning Committee.
 - 3.10 Full details of the community consultation will be detailed in the PAC Report which will support the planning application.
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4.0 Proposed Development

- 4.1 The application seeks full planning permission for the development of 16 x one-bedroom cottage flats and 8 x two-bedroom cottage flats, with associated landscaping and vehicular access.
- 4.2 The Indicative Masterplan (Ref. C1104.004D) and Floor plans (Ref. C1104.005E; 008B; 010A; 011A; 012A; 013; 014; 015; 016; 017A; 018A; 019; and 020) have been provided to show the layout of the Proposed Development within the Application Site.
- 4.3 The Site Elevations (Ref. C1104.006C; 030A; 031A; 032A; 033; 034; 035A; 036A; 037; and 038A) and Site Visuals (Ref. C1104.050A – 053A) have also been provided in support of the Application to illustrate the scale and massing of the Proposed Development.
- 4.4 The layout, scale, design and massing has been developed in response to the surrounding context. A thorough assessment of the site and its benefits has allowed a design which will maximise the sites opportunities and characteristics. This is presented in the Design and Access Statement accompanying this application.
- 4.5 The following headings provide further information on the proposed development and should be read in conjunction with the Design and Access Statement and supporting planning application drawings:
- Numbers and Density.
 - Access and Parking.

Numbers and Density

- 4.6 The Site Plan and supporting floor plans detail how 24 cottage flats (Class C3) would be delivered on the Application Site. The proposed scheme has been developed in accordance with Policy PCYFF3 and the aspiration of the Council to provide a suitable mix of dwellings that contribute to creating an attractive and sustainable place to live.
- 4.7 The scale and massing of the development will respect the prevailing scale of the surrounding built form. The proposed building heights will be 2 storey, in keeping with surrounding context. The buildings have been designed to embed within the surrounding landscape, not detracting or impacting upon the amenity of adjacent residents.
- 4.8 It is considered the supporting package of drawings demonstrate a high-quality design and one which accords with the prevailing development plan policies PCYFF 3 & TAI 6, which requires a development to deliver high quality design and of a scale that is consistent with the character of the settlement.
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- 4.9 Please see the submitted Design and Access Statement for further detail on the proposed floor plans, elevations and the indicative design layout of the residential apartments.

Access and parking

- 4.10 Vehicular access to the proposed development will be taken from Cae Stanley on the southern boundary of the Application Site. The vehicular access has been designed to typical residential standards and will provide a 5.5m wide carriageway and 2m footways on both sides of the access.
- 4.11 The proposed site access arrangement is detailed on Drawing Number SCP/220728/D01, presented in Appendix C of the Transport Statement.
- 4.12 2.4m x 43m visibility, in accordance with the visibility requirements set out in TAN 18 for a 30mph road, is achievable in both directions from the proposed site access
- 4.13 Swept path analysis has been undertaken of the site access and internal road layout, as shown on Drawing Number CP/220728/ATR01 presented in Appendix D of the Transport Statement, which demonstrates that a refuse vehicle can access the site, turn within the site and exit in a forward gear.
- 4.14 A public footpath is present on the southern side of Cae Stanley, which bounds the Application Site to the south (Ref. Lôn Caeathro). This will be retained, with no impact on its routing or alignment due to the proposed development.
- 4.15 28 car parking spaces will be provided within the Application Site. This is in compliance with the Councils Parking Standards, as per the requirements of the JLDP Policy TRA 2.

Landscaping

- 4.16 The Landscape Plan (Ref. 3247/01 Rev 02) demonstrates the proposed landscape enhancements across the developed and undeveloped parts of the Application Site this includes areas of soft and hard landscaping and private amenity spaces, alongside tree and hedgerow planting in the gardens and shared areas, to provide appropriate screening from any neighbouring views.

Trees

- 4.17 A Tree Protection Plan (Ref. D.RTA.89.02), Tree Constraints Plan (Ref. D.RTA.89.01) and Arboricultural Impact Assessment (Ref. RTA.89.001) has been carried out by Enfys Ecology. The Arboricultural Impact Assessment considers the implications that the proposed development will have on trees within the site. The Arboricultural Impact Assessment also provides potential solutions to any implications on trees where possible.
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5.0 Planning Policy Context

Introduction

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning applications should be determined in accordance with the Development Plan, unless other material consideration indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.

Adopted Development Plan

- 5.2 The Development Plan for Gwynedd Council consists of the following documentation:
- Anglesey and Gwynedd Joint Local Development Plan 2011- 2026 (JLDP)
- 5.3 The JLDP covers the period 2011 - 2026 and was adopted by the Council in January 2017. The Local Plan sets out the vision and spatial strategy for the region during the plan period.
- 5.4 Table 1 identifies the key policies from the Local Plan that the development will be assessed against.

Table 1 Relevant Development Plan Policies

Policy	Description
Policy PS1	Welsh Language and Culture
Policy PS2	Infrastructure and Developer Contributions
Policy ISA1	Infrastructure Provision
Policy ISA5	Provision of Open Spaces in New Housing Developments.
Policy TRA2	Parking Standards
Policy TRA4	Managing Transport Impacts
Policy PS4	Sustainable Transport, Development and Accessibility
Policy PS5	Sustainable Development
Policy PCYFF1	Development Boundaries
Policy PCYFF2	Development Criteria
Policy PCYFF3	Design and place shaping

Policy	Description
Policy PCYFF4	Design and Landscaping
Policy PS17	Settlement Strategy
Policy TAI3	Housing in Service Villages
Policy TAI8	Appropriate Housing Mix
Policy TAI15	Threshold of Affordable Housing and their Distribution
Policy AMG5	Local Biodiversity Conservation

Material Considerations

National Planning Policy

- 5.5 Planning Policy Wales (Edition 11, February 2021) provides the overarching policy context and guidance for planning within Wales. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.
- 5.6 Paragraph 2.21 advises that planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.
- 5.7 Paragraph 2.22 goes on to advise that the key factors in an assessment relate to social considerations, economic considerations, cultural considerations and environmental considerations.
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- 5.8 Section 3 relates to design and Placemaking In Action. It considers that Good Design Making Better Places. Paragraph 3.3 advises that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area.
- 5.9 Paragraph 3.55 states that previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.
- 5.10 Paragraph 4.2.2 advises that the planning system must:
- identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;
 - enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and
 - focus on the delivery of the identified housing requirement and the related land supply.
- 5.11 Paragraph 4.2.1 advises that new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities.
- 5.12 With regards to density paragraph 4.2.22 states that planning authorities will need to ensure that in development plans and through the development management process they make the most efficient use of land and buildings in their areas. Higher densities must be encouraged on sites in town centres and other sites which have good walking, cycling and public transport links.

Technical Advice Notes

TAN 5 – Nature Conservation and Planning

- 5.13 Technical Advice Note 5 ‘Nature Conservation and Planning’ provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
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- 5.14 Paragraph 16.1 states that biodiversity conservation and enhancement is an integral part of planning for sustainable development. The planning system has an important part to play in nature conservation. The use and development of land can pose threats to the conservation of natural features and wildlife. Past changes have contributed to the loss of integrity of habitat networks through land-take, fragmentation, severance, disturbance, hydrological changes and other adverse impacts. But development can also present significant opportunities to enhance wildlife habitats and the enjoyment and understanding of the natural heritage.

TAN 12 – Design

- 5.15 The guidance in TAN 12 has been considered in formulating the proposal and in reporting on the Design and Access issues. The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion.
- 5.16 Paragraph 5.5.1 of TAN 12 states that the distinctive settlement patterns which characterise much of Wales have evolved in part in response to the country's diverse landscape and topography. The way in which development relates to its urban or rural landscape or seascape context is critical to its success. Because of this, an understanding of landscape quality, including its historic character, is fundamental to the design process.

TAN 18 – Transport

- 5.17 TAN 18 has been considered as part of the design of the Proposed Development. The aim of TAN 18 is to ensure that new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.
- 5.18 TAN 18 provides guidance on providing good accessibility with objectives such as:
- ensuring new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.
 - ensuring that new development and major alterations to existing developments include appropriate provision for pedestrians (including those with special access and mobility requirements), cycling, public transport, and traffic management and parking/servicing.

TAN 20 – Planning and the Welsh Language

- 5.19 TAN 20 provides guidance on how the planning system considers the implications of the Welsh language when preparing LDPs and making decisions. The LPA should consider the needs and welfare of the Welsh language, and in so doing, contribute to its well-being.
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6.0 Compliance with Planning Policy

Principle of Development

- 6.1 **Policy PCYFF1** (Development Boundaries) identifies Development Boundaries for the Sub-regional Centres, Urban Service Centres, Local Service Centres, Service Villages and Local / Rural / Coastal Villages. Proposals within Development Boundaries will be approved in accordance with the other policies and proposals of this Plan, national planning policies and other material planning considerations.
- 6.2 The Application Site is within the Bontnewydd settlement boundary, a Service Village as defined in the JLDP.
- 6.3 This Planning Statement and the supporting documentation demonstrate that the Proposed Development is in compliance with both national and local planning policy and other material considerations.
- 6.4 **Policy PCYFF2** (Development Criteria) states that a proposal should demonstrate that it is in compliance with the relevant policies in the Plan and National planning policy and guidance. Proposals should make the most efficient use of land, including achieving densities at a minimum of 30 housing units per hectare for residential development. Proposals should also provide appropriate amenity space to serve existing and future occupants and include provision for storing, recycling and waste management.
- 6.5 The Policy advises that planning permission will be refused where the Proposed Development would have an unacceptable adverse impact on: the health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance.
- 6.6 This planning policy analysis demonstrates how the Proposed Development complies with the relevant Local Plan policies and should be considered sustainable development.
- 6.7 The Application Site is approximately 0.4 hectares. The Proposed Development seeks to provide 24 cottage flats on the Application Site. The Proposed Development is therefore in excess of the minimum housing density required.
- 6.8 The site is allocated for 10 units, this 'allocated' number of units would be below the minimum density requirement as defined in Policy PCYFF2. The proposed number of units proposed is over double the number of units allocated, however it is still for only 12 fixed housing plots, as two cottage flats occupy each individual dwelling- with a flat per floor. Thus the site doesn't appear over developed and is well suited for the 12 plots.
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- 6.9 Cottage flats are apartments with their own entrances and no shared communal areas. This is a favoured accommodation type with a high demand within the local housing market area for the proposed operator and registered provider.
- 6.10 No issues have been raised during the supporting technical assessments in respect of impacts on highways, drainage, contamination and foul sewage infrastructure. The Principal Contractor will also work to a Construction Environmental Management Plan, during construction to ensure there are no adverse effects on adjacent residents and the surrounding habitats from construction noise, dust, fumes, litter, oil spills and other forms of pollution.
- 6.11 **Policy PS16** (Housing Provision) states that based on the level of anticipated housing need, balanced against deliverability, environmental and landscape constraints, economic and demographic prospects, and potential demographic profile, the Councils will make provision for a requirement for 7,184 housing units between 2011 and 2026. This requirement will be met by identifying opportunities for around 7,902 housing units to enable a 10% slippage allowance.
- 6.12 A constant minimum 5-year supply of housing land will be maintained by allocating land and facilitating development on windfall sites and by using existing buildings.
- 6.13 The Isle of Anglesey County Council and Gwynedd Council Joint Housing Land Availability Study 2019 states that the Council has a supply of 5.3 years of deliverable housing sites. However, the Gwynedd Local Housing Market Assessment (LHMA) (2018) has identified a need for 707 additional affordable homes annually over the plan period (2018 – 2023). The LHMA identifies that the overall split of tenure types can be looked at on a site-by-site basis and will depend upon the demand on the waiting lists at that time.
- 6.14 The Applicant has reviewed the Gwynedd Common Housing Register for social and affordable housing in Bontnewydd. This has confirmed the overarching demand and requirement for 1 and 2 bedroom dwellings within Bontnewydd, with over 300 people on the waiting list for this accommodation type. The proposed mix of units is therefore aligned with the current housing demand for the village.
- 6.15 The Application Site is also allocated for housing in the JLDP, so is therefore already considered a suitable location for residential development.
- 6.16 The scheme will be delivered in partnership with a locally active Registered Social Landlord. They have identified the overarching need for 1- and 2-bedroom units for social and affordable rent in Bontnewydd.
- 6.17 The Proposed Development will help to meet a shortfall in both Bontnewydd and Gwynedd for affordable dwellings, in a location that has been assessed as suitable for housing and with sufficient demand, for a scheme of this type, size and tenure.
- 6.18 **Policy PS17** (Settlement Strategy) states that housing development is distributed in accordance with the following settlement strategy based on a settlements level of service provision, function and size (population) and subject to its environmental, social and infrastructure capacity to accommodate development:
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Category	Type of Development
Villages and Clusters – 25% of the Plan's Growth located within:	
(iv) Service Villages	Higher level of housing will occur within this category compared to other types of Villages. This will be delivered through commitments and new allocations (open market housing with a proportion of affordable provision). In addition windfall sites within the development boundary can be permitted.

- 6.19 The Application Site is within the settlement boundary and allocated for residential development – for 10 dwellings. Bontnewydd is in a sustainable location and considered a commuter village for Caernarfon, with easy access to many other towns and cities across the North Wales, due to its proximity to the main arterial transport routes through North Wales.
- 6.20 The Proposed Development is of a scale appropriate to the surrounding development context and the additional housing and residents generated are not deemed to have a detrimental impact on the function and role of local services.
- 6.21 Potential cumulative impacts will be considered by the Council as part of the determination process. It is for the Council to determine how much development is appropriate in Bontnewydd when considered against Planning Policy in respect of sustainable development. The Housing Statement, submitted in support of the Application, demonstrates the strong demand for the proposed number of affordable dwellings.
- 6.22 The assessment work undertaken and detailed within the supporting: Transport Statement, Flood Consequence Assessment and Ecology Report show that the proposals are of limited impact to local services and infrastructure and that on balance the proposals represent sustainable development. The Applicant also agrees to make financial contributions towards education provision and open space improvements, via a S106.
- 6.23 **Policy TA13** (Housing in Service Villages) states that in the following Service Villages housing to meet the Plan's strategy will be delivered through housing allocations identified below and suitable windfall sites within the development boundary based upon the indicative provision in the tables below:
- Bontnewydd (T60) – 10 units
- 6.24 The Proposed Development is seeking to deliver 24 cottage style flats within the allocated Application Site. Although this is in excess of the estimated number of units it is deemed to be suitable in this sustainable location and aligned with Policy PCYFF2, based upon the unit types, number of plots and the affordable housing demand.

- 6.25 The pre-application response received stated that “justification will be needed with this application outlining how the proposed intention will greet the need of the additional units.” This justification is detailed within the submitted housing statement, but in short there is an identified need for one- and two-bedroom affordable housing, with over 300 people in Bontnewydd alone on the waiting list for accommodation of this type, size and tenure. There is an acute demand for the Proposed Development and it is therefore justified that an additional 14 dwellings, above the site allocation can and should be delivered on the Application Site.
- 6.26 The Proposed Development is of a scale and design appropriate to the surrounding development context and will not have a detrimental impact on the function and role of local services within Bontnewydd and Caernarfon.
- 6.27 **Policy TA18** (Appropriate Housing Mix) states that the Council will work with partners to promote sustainable mixed communities by ensuring that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community.
- 6.28 Proposals should contribute to creating sustainable mixed communities by maximising the delivery of affordable housing, ensuring the correct mix of housing unit types and tenures to meet the needs of the Plan areas current and future communities and ensuring high standards of design that create sustainable and inclusive communities in line with Policy PCYFF 3.
- 6.29 For affordable housing Gwynedd uses an allocation scheme which awards points to prioritise applicants based on their situation and needs. For an applicant to be considered for social and affordable housing they must be registered with the Gwynedd Common Housing Register. This is done through application to the Gwynedd Housing Options Team.
- 6.30 Please find below the waiting list for affordable rented units in Bontnewydd, according to the information received from the Housing Options Team (January, 2023): -

Area Waiting List

Ward	Housing Type	Waiting List/ Demand
Bontnewydd	1 bed dwelling	1
	2 bed dwelling	12
	3 bed dwelling	16
	4+ bed dwelling	5

- 6.31 Social rented housing are properties that are let with affordable rent in a safe manner to those with a housing need and they are provided by local authorities and Registered Social Landlords (RSL), whereby rent levels are aligned with the rent guidelines and the Welsh Government’s rent threshold. Social housing properties are allocated based on need.
- 6.32 Please find below the current housing figures for social and intermediate rent in Bontnewydd, received from the Housing Options Team (February, 2023): -

Social Rented Units (Gwynedd Common Housing Register) as of February 2023	1 bed	2 bed	3 bed	4 bed
Bontnewydd	114	182	116	39

- 6.33 It can be seen from the tables above that there is an acute need for one- and two-bedroom dwellings in Bontnewydd, with a total of 309 Applicants awaiting accommodation for social and affordable rent accommodation of this type and size. There is also a demand for 3 bedroom accommodation, with 136 people on the affordable and social rent waiting list for this size of accommodation. Whereas the demand for 4+ bedroom affordable and SR accommodation in Bontnewydd is very low in comparison to that of 1, 2 and 3 bedroom units. For comparison there is a 602% higher demand for 1 and 2 bedroom properties than 4 bedroom and 134% higher demand for 1 and 2 bedroom properties against 3 bedroom accommodation.
- 6.34 An alternate mix of unit types was considered, with an element of three-bedroom housing units included. However the development of one x 3 bedroom dwelling would result in the loss of at least 2 cottage flats. Therefore impeding the delivery of the more in demand affordable/ social housing type and resulting in a net loss of affordable accommodation provided.
- 6.35 Providing 1- and 2- bedroom dwellings will offer an opportunity for existing residents within the local housing market to move up and/ or down the housing ladder into more suitable accommodation with a good quality finish and in an sustainable location with good public transport links. This will help to establish and retain a sense of place and community, improving living conditions for the residents and area – in place of the existing vacant site.
- 6.36 Following recent changes to the benefits system, several tenants have suffered due to the bedroom tax because of under occupancy and wish to move to a smaller home. One and two-bedroom properties would assist the RP to better manage its current stock and enable those applicants who wish to move to a smaller home, thus releasing a larger property to other applicants. This would subsequently help the smaller number families on the housing register who require 3 or 4-bedroom homes.
- 6.37 Based on the impact of the Bedroom Tax on families who claim housing benefits, the following numbers are under occupying their homes. These figures equate to circa 13% of the RP's stock, in Bangor, for example:
- Under occupying by 1 bedroom – 121
 - Under occupying by 2 bedroom – 38
- 6.38 The one and two-bedroom apartments will therefore attract those that are currently affected by bedroom tax, and this will release larger homes to families in need of housing.

- 6.39 The Proposed Development would therefore contribute towards the local requirement for affordable housing provision, by providing a mix of one- and two-bedroom dwellings to fulfil the local housing need. The houses will be managed by a Registered Social Landlord (Housing Association) who provides homes across North Wales and has confirmed sufficient interest in the design and mix of units.
- 6.40 **Policy TAI15** (Threshold of Affordable Housing and their Distribution) states that the Councils will seek to secure an appropriate level of affordable housing across the Plan area by working in partnership with Registered Providers, developers and local communities to meet the minimum target.
- 6.41 All developments will be required to achieve an appropriate mix in terms of tenure, types and sizes of local need affordable housing.
- 6.42 The Proposed Development seeks to provide 100% of the housing as affordable, this far exceeds the policy requirement. The mix and tenure of units has been designed to maximise the site opportunities and affordable housing provision.

Design and Landscaping

- 6.43 **Policy PCYFF3** (Design and Place Shaping) states that all proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.
- 6.44 The submitted package of drawings demonstrate a strong emphasis on a design which is in keeping with the local form, scale and layout of the immediate surrounding context, complementing yet no detracting from the overall character and aesthetic of the locality.
- 6.45 For further detail on the proposed design and how the surrounding context has helped develop the proposals please refer to the submitted Design and Access Statement and package of drawings.
- 6.46 **Policy PCYFF4** (Design and Landscaping) states that all proposals should integrate into their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused.
- 6.47 The Landscape Plan (Ref. 3247/01) and supporting rhetoric within the Design and Access Statement details the outline landscaping and open space strategy for the Application Site.
- 6.48 **Policy PS5** (Sustainable Development) states that development will be supported where it is demonstrated that they are consistent with the principles of sustainable development.
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- 6.49 Paragraph 2.22 of PPW states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): Economic; Social; and Environmental.
- 6.50 The Proposed Development comprises sustainable development across all three dimensions. The benefits of the proposal, in addition to those raised throughout this Statement, can be summarised as follows:
- 6.51 Social Role:
- Provision of affordable (24) housing units will address the need within the community for 1- and 2-bedroom accommodation.
 - All dwellings will contain suitable private amenity space.
 - The proposed site is within 1 mile of all essential and conventional community services and facilities, such as schools, cafés, public houses, a post office and medical centre, helping to ensure the future viability of these services.
 - There is an extensive public transport offering accessible from Bontnewydd. The Application Site is adjacent to bus stops on Pwllheli Road, with direct bus routes into Caernarfon, Bangor and Pwllheli, which provide connections to train and other services.
- 6.52 Economic Role:
- The future residents of the development could be expected to spend up to £738,816 per year in the local area, using data from the Family Expenditure Survey (2019) (£592 is the average spend per house per week).
 - According to the House Builders Federation Housing Calculator, the Proposed Development would:
 - Support the employment of 74 people.
 - Increase open space, community sport, leisure spending by £19,348 which could for example provide 1 x 5 a side football pitches.
 - Generate £289,272 in tax revenue and £27,107 in Council tax revenue.
- 6.53 Environmental Role:
- Good design will be fundamental to the development.
 - The development will provide adequate internal and external space for non-recyclable and recyclable waste.
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- The development will promote resource efficiency through the effective and appropriate management of construction site waste.
- Materials with lower environmental impacts over their life cycle will be used.
- Soft landscaping will be implemented to soften and screen the proposed scheme.
- The discharge of surface water from the proposed development will be no greater than the run-off from the existing use.

6.54 **Policy ISA5** (Provision of Open Spaces in New Housing Developments) states that new housing proposals for 10 or more dwellings, in areas where existing open space cannot meet the needs of the proposed housing development will be expected to provide suitable provision of open spaces in accordance with the Fields in Trust (FIT) benchmark standards of 2.24 hectares per 100 population.

6.55 No public open space provision is provided as part of the Proposed Development, although suitably sized gardens and private amenity areas are provided within the site for each dwelling.

6.56 Guidance on acceptable walking distance and time is published by FIT in its document Beyond the Six Acre Standard (2015). The FIT guidance, alongside the Gwynedd Council Supplementary Planning Guidance – Open Spaces in New Residential Developments (March 2019) provides the following accessibility standards:

- Local Area for Playing (LAP)– 100 metres walking distance.
- Locally Equipped Areas for Playing (LEAP) – 400 metres walking distance.
- 1.2km from a sports pitch – 1.2km

6.57 The Application Site is within walking distance of the following open space typologies:

- Local Area for Playing (LAP)– 100 metres to the south (Land off Llwyn Beuno)
- Locally Equipped Areas for Playing (LEAP) – 135m to the southeast (Llwyn Beuno play park)
- Sports pitch – 350m to the east (Bontnewydd Football Club)

6.58 The quantum of accessible open space provision within close proximity to the Application is high. However the Applicant agrees to pay a financial contribution (understood to be in the region of £4,800), via a S106 agreement, towards the maintenance and/ or creation of a new play area with equipment for children locally.

6.59 Therefore, it is not considered that the proposal will be contrary to Policy ISA 5 of the LDP, as well as SPG: Open Spaces in New Housing Developments.

Biodiversity

- 6.60 **Policy AMG5** (Local Biodiversity Conservation) states that proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area by avoiding significant harmful impacts through the sensitive location of new development; and consider opportunities to create, improve and manage wildlife habitats and natural landscape.
- 6.61 A 'Preliminary Ecological Appraisal' (PEA) has been submitted in support of the Application. This demonstrates that no protected species were recorded during the survey but there is the potential for badgers to be present at the appropriate time of year and for bats to inhabit the adjacent trees and woodland. Some precautionary measures have therefore been recommended.
- 6.62 Under Chapter 6 of Planning Policy Wales 11, planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. To satisfy this condition, it has been recommended within the PEA that new accommodation for bats is included as an integral part of some of the buildings, and that plant species of benefit to wildlife are included in any landscaping scheme. This will be included and detailed at the planning condition stage.
- 6.63 **Policy LP33** (Trees) states that the Council will not grant planning permission for developments which directly or indirectly threaten trees or woodland of significant amenity.
- 6.64 A Tree Survey and Arboricultural Impact Assessment has been submitted in support of the Application. This demonstrates that 1 individual trees must be removed to facilitate the development proposals. This is a low value sycamore growing directly adjacent the existing field fence which is proposed to be replaced by a new wall.
- 6.65 Some Category U trees have been identified and are unsuitable for retention and are recommended for removal due to severe crown decline and potential hazard they pose as they further decline and become unstable. The remaining trees may be retained and incorporated into the development although some pruning of trees overhanging the site boundary will be required.

Transport and Parking

- 6.66 **Policy TRA2** (Parking Standards) states that parking provision for all modes of transport should be in accordance with the Councils Parking Standards.
- 6.67 The Proposed Development seeks to provide 24 car parking spaces for residents and 4 on site spaces for visitors, which is in compliance with the Councils Parking Standards.
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- 6.68 **Policy TRA4** (Managing Transport Impacts) states that where appropriate, proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users... Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused.
- 6.69 The Transport Statement and Design and Access Statement submitted in support of the Application demonstrates that the application site and the Proposed Development itself is accessible by all modes of transport, with all internal roads and pathways designed to facilitate all end users and encourage the use of sustainable modes of transport.
- 6.70 The Transport Statement demonstrates that the proposed development has a satisfactory access design and layout, with an emphasis and approach favouring sustainable modes of transport.
- 6.71 **Policy PS4** (Sustainable Transport, Development and Accessibility) states that where appropriate, proposals should be planned and designed in a manner that promotes the most sustainable modes of transport, having regard to a hierarchy of users.
- 6.72 A bus stop is located 0.1 miles (1-minute walk) from the Application Site, on Pwllheli Road to the west with regular services to Caernarfon, Pwllheli and Bangor, where transport connections can be sought to a wider area.
- 6.73 The Transport Statement submitted in support of the Application demonstrates that the site can be accessed by a variety of sustainable modes of transport.

Infrastructure and Contributions

- 6.74 **Policy PS2** (Infrastructure and Developer Contributions) states that the Councils will expect new development to ensure sufficient provision of essential infrastructure is either available or provided in a timely manner to make the proposal acceptable.
- 6.75 If planning contributions and obligations are required, then they will be agreed with the Council during the S106 negotiation.
- 6.76 **Policy ISA1** (Infrastructure Provision) states that proposals will only be granted where adequate infrastructure capacity exists or where it is delivered in a timely manner. Where proposals generate a directly related need for new or improved infrastructure and this is not provided by a service or infrastructure company, this must be funded by the proposal.
- 6.77 Based upon the Gwynedd Councils SPG on 'Housing Development and Education Provision' only 3 (0.40 x 8) pupils will be generated by this development and thus a financial contribution of £12,257 per pupil (£36,771) will be made by the Applicant via a S106 Agreement if there is not sufficient capacity within the local primary school for the additional pupils.
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- 6.78 No issues have been raised in respect of impacts on highways, drainage and foul sewage infrastructure during the supporting technical assessments.
- 6.79 The assessment work undertaken details that the proposals are of limited impact and that on balance the proposals represent sustainable development.
- 6.80 If any existing infrastructure is not sufficient to facilitate the construction of an additional dwellings, then the Applicant will discuss with the Council the relevant course of action.

Welsh Language

- 6.81 Policy PS1 (Welsh Language and Culture) states that the Councils will promote and support the use of the Welsh Language in the Plan area. This will be achieved by requiring a Welsh Language Statement and Impact Assessment in support of the Planning Application. Proposals will be refused where they would cause a significant harm to the character and language balance of a community.
- 6.82 A Welsh Language Statement and Impact Assessment has been submitted in support of this Application. This report demonstrates that the proposed development would have beneficial effects on the Welsh language and the community within Bontnewydd through the provision of affordable housing to meet an identified need, although no identifiable change to the overall number of Welsh speakers is expected
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7.0 Technical Considerations

Arboriculture

- 7.1 Based on an objective assessment made in accordance with BS 5837:2005 Trees in Relation to Construction – Recommendations, there are 5 Category B, 5 Category C, 4 Category U trees and groups and one woodland on or within influencing distance of the site. Tree locations, their quality categories, Root Protection Areas (RPA) and canopy spreads are shown on Drawing 1 - Tree Constraints Plan.
- 7.2 1 individual tree must be removed to facilitate the development proposals. This is a low value sycamore growing directly adjacent the existing field fence which is proposed to be replaced by a new wall.
- 7.3 Category U trees are unsuitable for retention and are recommended for removal due to severe crown decline and potential hazard they pose as they further decline and become unstable.
- 7.4 The remaining trees may be retained and incorporated into the development although some pruning of trees overhanging the site boundary will be required.
- 7.5 Temporary protective barrier fencing will be required to demarcate a Construction Exclusion Zone (CEZ) around retained trees. This must be put in place prior to the commencement of any development works, including bringing machinery or materials onto site, the erection of site huts.
- 7.6 Alignment of the proposed retaining wall in the north of the development encroaches marginally within the RPAs of existing trees. To minimise damage to the rooting area of retained trees, construction of the wall foundations when encroaching into the RPAs should be carried out using sensitive excavation techniques.
- 7.7 The proposed location of the Sustainable Urban Drainage System (SUDS) flood basin is within the RPA of small number of retained trees. This will necessitate the production of an Arboricultural Method Statement (AMS) (see Section 6) which will detail sensitive construction techniques adopted to maximise the likelihood of healthy and stable tree retention.
- 7.8 Ornamental tree planting will take place amongst the new residential development. Following the establishment of the planting scheme, a net increase in tree cover, arboriculture and amenity value will be achieved.
- 7.9 An arboricultural consultant will be appointed to oversee all aspects of tree care and protection for the duration of the construction works. Drainage and Flood Risk

Ecology

- 7.10 A preliminary ecological assessment, (PEA) was carried out by Cambrian Ecology Ltd.
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- 7.11 The survey revealed that the only habitats present on the site are improved grassland and scattered scrub. The site is encompassed on three sides by a post and wire fence and a wooded riparian corridor lies to the immediate north of the site in the form of the Afon Beuno.
- 7.12 The biological records search, which was carried out with the Local Records Centre, (LRC) 'Cofnod' revealed that there are a number of statutory and non-statutory designated sites within the 2km and 10km search radius, none of which will be impacted by the proposed development as long as some basic 'Reasonable Avoidance Measures' (RAMS) are adhered to.
- 7.13 The data search also revealed records of multiple bat species as well as records of other protected species including badgers; (*Meles meles*), hedgehogs; (*Erinaceus europaeus*), otters; (*Lutra lutra*), pine martens; (*Martes martes*) and water voles; (*Arvicola amphibius*). Recommendations are provided regarding new external illumination in order to prevent a negative impact on bats.
- 7.14 No evidence of the presence of any protected species was recorded during the survey. However, it was deemed that there is the potential for badgers and hedgehogs to be accessing the site to forage and for otters to be crossing over the site when moving between water courses. Additionally, there is high potential for bats to be using boundary features to commute and forage. As such, a precautionary approach has been recommended to avoid any negative impact on these taxa, see Section 9 of the report. Recommendations are also provided regarding the potential for nesting birds to be present within the trees adjacent to the site.
- 7.15 Under Chapter 6 of Planning Policy Wales 11, Planning Authorities must seek to maintain and enhance Biodiversity in the exercise of their functions. In this case biodiversity enhancements will be achieved through native tree and wildflower planting and the inclusion of 10 bat tubes integral to the fabric of the new properties.

Flood Risk and Drainage

- 7.16 The majority of the Application Site is in Flood Zone 1, however the western edge of the proposed site is located within flood zone 3, as shown on Natural Resources Wales Flood Map for Planning.
- 7.17 Under current legislation and guidance there is significant weight towards refusing highly vulnerable development (residential) within areas of high flood risk. Therefore any housing needs to be sited within an area not deemed to be of flood risk – in the medium and long term.
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- 7.18 Egniol have been instructed by the Applicant to design and produce the requisite drainage and flood risk strategy. Their report concludes that that due to the variable permeability of the existing sub-strata, soakaway devices are considered suitable for the west of the site only and are deemed inappropriate means of disposing of surface water run off from the entirety of the development. Therefore, attenuated permeable car parking and raingardens will be utilised to the east and centre of the site, with an unlined attenuation basin to the west of the site which will utilise a positive a positive restricted connection to the Afon Bueno as well as infiltration.
- 7.19 The proposed surface water drainage solution for the development utilises attenuated (or lined) permeable block paved car parks, raingardens and an attenuation basin to discharge the surface water run off primarily to the local watercourse with some infiltration to ground. Flood Mitigation is to be designed for the 1 in 100 storm event plus 40% allowance for climate change.
- 7.20 The overland flows are expected to follow the general topography of the site which falls from the southeast of the site to the north west. It is anticipated that the site levels will be designed such as to allow any overland flooding events to be retained within the site boundary.

Ground Investigation and Land Contamination

- 7.21 Soil & Structures were to instructed to undertake a Phase 1 Ground Investigations Engineering Study in support of the Application.
- 7.22 In conclusion, the Engineering Desk Study finds that the site ground conditions are considered to be; reasonably well-characterised with; intrusive investigation recommended to support further assessment of risk and support the design.
- 7.23 In conclusion, the Engineering Desk Study finds that;
- The risk rating for the ground is 'low'. Further assessment is recommended to: confirm the ground conditions across the Site; confirm the foundation arrangements for the existing structures; and, confirm the geotechnical characteristics of the soils / rocks.
 - The anticipated moderate strength of the shallow soils may support the adoption of traditional, strip foundations

Transport

- 7.24 SCP were instructed to produce a Transport Statement in support of the Application to assess the traffic and transport implications associated with the development proposals.
- 7.25 The personal injury accident data for the most recently available five-year period has been reviewed and does not represent a material concern in the context of the proposed development.
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- 7.26 The accessibility of the site has been assessed. Overall, the site is considered to be reasonably well located in terms of its accessibility by all the major non-car modes of transport. These findings demonstrate that future residents will not be wholly reliant on the private car to travel for employment, education, leisure and retail purposes. Furthermore, given that the site is accolated for housing in the Anglesey and Gwynedd Joint Local Development Plan 2011 - 2026, the principle of residential development on the application site has already been deemed acceptable to GC.
- 7.27 Vehicular access to the development will be provided off Cae Stanley to the south of the site. The access has been designed to typical residential standards, providing a 5.5m wide carriageway with 2m footways on both sides, and a dropped kerb crossing with tactile paving is proposed to assist pedestrians across the access. Pedestrian and cycle access to the site will be provided at the same location as the vehicular access and an additional pedestrian link is provided to the west of the site access.
- 7.28 The volume of traffic generated by the proposed development will not have a material impact on the operation of the local highway network and the effect of the additional traffic will be barely perceptible during the highway peak hours.
- 7.29 Having regard to the analysis presented in this TS, it is considered that there should be no highway related reason to withhold planning permission and the scheme is therefore commended to Gwynedd Council for approval.
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8.0 Conclusions

- 8.1 This Planning Statement has been prepared by Kingscrown Land & Commercial Ltd (the Applicant) in a support of a full planning application for residential development comprising 24 dwellings, arranged as a mixture of one and two bedroom cottage flats (Class C3), including car parking, landscaping and a new access ('the Proposed Development') on 1 acre of land off Cae Stanley, Bontnewydd, Caernarfon ('the Application Site').
 - 8.2 The application is supported by a suite of reports and drawings which detail how the Proposed Development could be achieved on the Application Site in consideration of Gwynedd Council's relevant policies alongside national legislation, guidance and standards.
 - 8.3 Sections 38 (6) of the Planning and Compulsory Purchase Act 2004 states that decisions on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement has been demonstrated through the policy analysis that the Proposed Development is acceptable and compliant with planning policy and all technical assessments and should therefore be supported.
 - 8.4 The Proposed Development will help to bring forward an allocated site for much needed housing and increase the provision of affordable housing within the locality, bringing with it the associated economic, social and environmental benefits.
 - 8.5 In consideration of Paragraph 8 of the Framework, the Proposed Development is sustainable development across all three dimensions and should be approved without delay.
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