

# CADNANT

PLANNING

**LAND AT TAN Y GRAIG FARM, PENTRAETH  
DESIGN, ACCESS AND PLANNING STATEMENT**

Grŵp Amos Cymru Cyf

April 2024

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## Design, Access and Planning Statement



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## Contents

1. Introduction.....	1
2. The site and context .....	3
3. The proposed development .....	6
4. Policy context.....	9
5. Main considerations.....	20
6. Other design considerations .....	30
7. Accessibility .....	32
8. Conclusion.....	35

# 1. Introduction

- 1.1 This Design, Access and Planning Statement accompanies an application by Grŵp Amos Cymru Cyf, for full planning permission for the erection of 25 dwellings, construction of an internal access road and pedestrian link together with associated works and landscaping on land at Tan y Graig Farm, Pentraeth.
- 1.2 The proposal would form part of an enabling development proposal linked to the restoration of Aberbrait, Llanfairpwll, which is a Grade II\* listed building also owned by Amos Group.
- 1.3 The site benefits from planning permission for holiday accommodation in the form of 15 holiday chalets and this permission has been implemented by way of the creation of a new vehicular access approved as part of planning permission 42C6N and the laying of a road into the site.
- 1.4 Following the enactment of the Planning (Wales) Act 2015 (the Act) the requirement for pre-application consultation on major development schemes was implemented. This includes the provision of 10 residential dwellings or more. The proposed development exceeds the 10 dwelling threshold.
- 1.5 The requirement to carry out pre-application consultation falls under Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order. Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.
- 1.6 This Design, Access and Planning Statement is issued as part of a suite of documents for Pre-Application Consultation prior to the submission of a formal planning application.
- 1.7 As required by the Town and Country Planning (Development Management Procedure) (Wales) Order (Amendment) 2016 the statement aims to address the following matters;
- Explain the design principles and concepts that have been applied to the development;
  - Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;

## Design, Access and Planning Statement

- Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
  - Explain how any specific issues which might affect access to the development have been addressed.
- 1.8 The adopted development plan consists of the Anglesey and Gwynedd Joint Local Development Plan (JLDP), which was adopted in July 2017.
- 1.9 Pre-application discussions were undertaken with the Local Planning Authority prior to the commencement of Pre-Application Consultation on a draft application.
- 1.10 The feedback received advised that the principle of enabling development at Tan y Graig, Pentraeth, linked to the restoration of Aberbraint, Llanfairpwll (Grade II\* listed) is considered acceptable in principle subject to the applicant demonstrating compliance with Policy AT 2 of the Anglesey and Gwynedd Joint Local Development Plan which aims to secure the preservation and/or alternative use of a listed building.
- 1.11 Advice and feedback received during pre-application discussions has been taken into account whilst formulating the application.

## 2. The site and context

- 2.1 The application site comprises of a rectangular parcel of land which was previously used for agricultural grazing. The site is located in a semi-rural area west of the village of Pentraeth. The site measures just under 1ha and is set back from the B5109 to the south and sits adjacent to the existing Tan Y Graig cottages to the west. To the north of the site consists of open fields, with the village of Pentraeth located less than 0.5km to the east. There is a mixture of Blackthorn and Hawthorn hedges along the site's frontage, with some scrub along the site's eastern boundary and Buddleia and Blackthorn shrubs to the west. There are some sparse Willow, Blackthorn and Hawthorn shrubs on a soil bund along the northern boundary.
- 2.2 The site lies outside the Area of Outstanding Natural Beauty (AONB) and Special Landscape Area (SLA) as defined within the adopted Joint Local Development Plan (JLDP). The site is outside the defined development boundary of Pentraeth (which is approximately 0.4km away). Figure 2.1 identifies the location of the site.

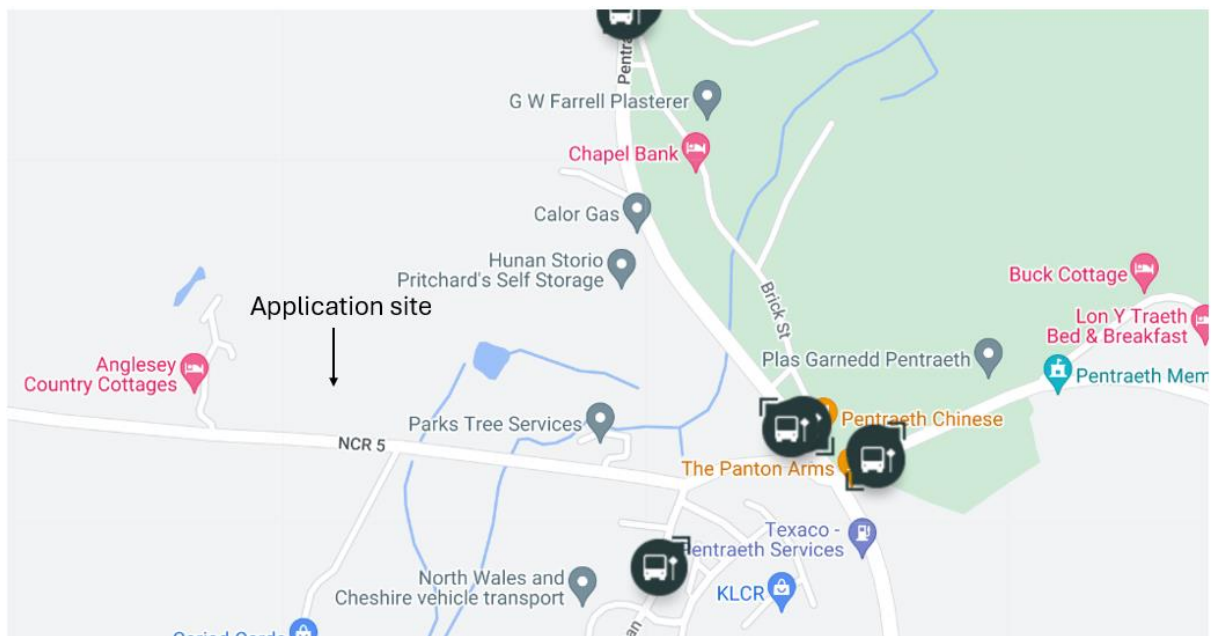
**Figure 2.1 Aerial image identifying the application site in the context of its surroundings**



## Design, Access and Planning Statement

- 2.3 The site benefits from planning permission (42C6N) for holiday accommodation in the form of 15 holiday chalets and this permission has been implemented by way of the creation of a new vehicular access approved as part of planning permission 42C6N and the laying of a road into the site.
- 2.4 The application site is located in a sustainable location. There are public transport facilities in close proximity to the site. Figure 2.3 is an extract of Traveline Cymru Bus Stop Locator. The nearest bus stop is located approximately 0.3km from the site and allows users access to access bus service 62, 50 and 55 among others. Bus service no. 62 provides access to Bangor to the south and Cemaes Bay to the north, as well other bus stops in-between across the A5025. This provides regular services from Pentraeth.

**Figure 2.3 Extract of Traveline Cymru**



- 2.5 The application site is located off the B5109, which links to the nearby A5025 road. The site therefore has good transport links to the A55 and the wider Isle of Anglesey, as well as access to Bangor for private car users.
- 2.6 The site is also located within close proximity to a National Cycle Network. The North Wales Coastal Route 5, which passes through Pentraeth (approx. 0.4km from the site), provides a long-distance cycle route connecting Holyhead and Reading. This cycle route will allow connectivity to other areas which Route 5 passes through such as Capel Coch, Menai Bridge, Bangor and more.

## Design, Access and Planning Statement

2.7 The combination of existing public transport links and cycle connectivity, the close proximity to Pentraeth Road (A5025) and B5109, make this an appropriate and accessible location for this development. Despite being in a location outside the development boundary of Pentraeth, the development would be located in a location which can be accessed by sustainable modes of transport in line with the aims of national and local planning policy.

## Planning history

- 2.8 The following planning decisions are relevant to the application site and adjoining site;
- 42C6N – Full application for the siting of 15 holiday chalets, construction of a new vehicular and pedestrian access together with associated works at Tan Y Graig, Pentraeth – Granted 15.10.18
  - DIS/2022/28 - Application to discharge condition (08) (Surface Water), (10) (Drainage and Street Lighting), (11) (Construction Traffic Management Plan), (14) (External Lighting) and (18) (Drainage System) of planning permission 42C6N (15 holiday chalet) at - Tan y Graig Farm, Lon Talwrn Road Pentraeth - Condition Partially Discharged – 16.8.22
- 2.9 As detailed above, the site benefits from planning permission for holiday accommodation in the form of 15 holiday chalets and this permission has been implemented by way of the creation of a new vehicular access approved as part of planning permission 42C6N and the laying of a road into the site.



### 3. The proposed development

- 3.1 The proposed development relates to the erection of 25 dwellings, comprising of 10 local market dwellings and 15 open market dwellings.
- 3.2 The application is presented as enabling development linked to funding the conservation deficit for restoration works at Aberbrait, Llanfairpwll which is a Grade II\* listed building also within the ownership of Grŵp Amos Cymru Cyf.

### Use, amount, scale, layout and access

- 3.3 The proposed dwellings would comprise of the following mix:

*Table 3.1 Proposed housing mix*

Type of dwelling	Name of house type	Number	Dwelling type
Open market	HT-A	9	3B5P 2 Story
Local market	HT-B	4	2B4P 2 Story
Open market	HT-C	5	4B8P 1.5 Story
Open market	HT-E	2	3B6P 1.5 Story
Local market	HT-F	1	4B 2 Story
Local market	HT-G	4	2B 1.5 Story

- 3.4 Each dwelling would have parking to the front/side with a small area of front/side garden with the main garden located to the rear. A patio area and garden shed would be provided within each plot.
- 3.5 Vehicular access to the proposed development would be gained from the B5109 to the south via an existing vehicular access, with an internal access road and pedestrian pavements within the site linking up with a new pedestrian link crossing the B5109, enabling pedestrians to walk into the village of Pentraeth. An extract of the proposed site layout plan is provided in Figure 3.1.

Figure 3.1 Extract of proposed site layout plan



3.6 The layout of the site comprises of an access road centrally into the site from the B5109 which would then split to provide access to the western and eastern part of the site. Open market dwellings are proposed to be located to the west of the site, with local market housing to be generally to be provided to the east. A surface water drainage basin would be located along the eastern site boundary.

## Appearance

3.7 The proposed dwellings would comprise of a mixture of semi-detached and detached properties comprising of a mix of unit sizes and types including two-storey houses and dormer bungalows. The materials proposed would comprise of a mix of render and cladding with natural slated roofs, which would be in-keeping with and would complement the design and appearance of other properties nearby.

## Landscaping

3.8 At present, there is a mixture of Blackthorn and Hawthorn hedges along the site's frontage, with some scrub along the site's eastern boundary and Buddleia and Blackthorn shrubs to the west. There are some sparse Willow, Blackthorn and

## **Design, Access and Planning Statement**

Hawthorn shrubs on a soil bund along the northern boundary. These are proposed to be retained with additional landscape planting proposed by way of native hedging between plots 1 to 7 and some native hedging to be planted within the scheme to the front of other dwellings.

- 3.9 Tree planting by way of Silver Birch and Mountain Ash are proposed to be planted scattered around the site as soft landscaping along with grassed gardens and open areas around the site including around the drainage basin and the pedestrian link from the site onto the B5109.
- 3.10 Timber fencing is proposed as a boundary treatment between residential gardens.

## 4. Policy context

4.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.

### National planning policy and guidance

4.2 The proposal relates to a residential development and relevant national planning policy is set out in:

- Planning Policy Wales (PPW) Edition 12, (2024);
- Future Wales: The National Plan 2040 (FWTNP);
- Building Better Places: The Planning System Delivery Resilient and Brighter Futures (July 2020);
- Technical Advice Note (TAN) 5 ‘Nature Conservation and Planning’;
- Technical Advice Note (TAN) 12 ‘Design’ (2016);
- Technical Advice Note (TAN) 18 ‘Transport’ (2007); and,
- Technical Advice Note (TAN) 20 ‘The Welsh Language’ (2017).

4.3 PPW aligns national planning policy strategy with the objectives of the Well-being of Future Generations (Wales) Act 2015, which is centred around achieving sustainable development. Changes introduced to PPW Ed 12 focus on Net Biodiversity Benefit and an expectation for development to demonstrate ecosystem resilience through the DECCA framework and via delivery of green infrastructure. The proposed development is in line with PPW as it provides housing in a sustainable location and the landscaping proposals would seek to contribute towards green infrastructure and biodiversity enhancement.

4.4 Relevant national planning policies are listed in table 4.1.

**Table 4.1: Summary of relevant national planning policy and guidance**

Policy	Summary
Planning Policy Wales, Edition 12, (2024) Chapter 2 Assessing the Sustainable Benefits of Development	Paragraph 2.26 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

## Design, Access and Planning Statement

	<p>robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.”</p> <p>Paragraph 2.27 goes on to advise that the key factors in an assessment relate to social considerations, economic considerations, cultural considerations, and environmental considerations.</p>
<p>Planning Policy Wales, Edition 12, (2024) Chapter 4 Housing</p>	<p>Paragraph 4.2.2 advises that; “The planning system must:</p> <ul style="list-style-type: none"> <li>• identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;</li> <li>• 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</li> <li>• focus on the delivery of the identified housing requirement and the related land supply.”</li> </ul> <p>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.”</p> <p>In terms of Housing Delivery, paragraph 4.2.10 guides that; “The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements must be demonstrated through a housing trajectory. The trajectory should be prepared as part of the development plan process and will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period.”</p> <p>Paragraph 4.2.15 relates to the delivery of a 5-year housing land supply, it states that; “Planning authorities must ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing judged against the general objectives, scale and location of development required in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable, in order to support the creation of sustainable communities. For land to be regarded as genuinely available it must be a site included in either a Joint Housing Land Availability Study (JHLAS) or, until a JHLAS is required to inform the first Annual Monitoring Report (AMR), in the housing trajectory agreed as part of an adopted development plan. The housing trajectory demonstrates how the planning authority will maintain a five-year supply of housing land over the plan period.”</p> <p>Paragraph 4.2.16 guides that; “Planning authorities, land owners and house builders must work together constructively to identify deliverable housing land in sustainable locations for development. When identifying sites to be allocated for housing in development plans, planning authorities must follow the search sequence set out in paragraphs 3.37-3.38, starting with the re-use of previously developed and/ or underutilised land within settlements, then land on the edge of settlements and then greenfield</p>

## Design, Access and Planning Statement

	<p>land within or on the edge of settlements. This process should be undertaken for housing market areas and will require collaboration between planning authorities where these areas cover more than one authority. The aim should be to make the best possible use of previously developed land in preference to greenfield sites across the market area as a whole.”</p> <p>In terms of density, paragraph 4.2.22 guides 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.”</p>
<p>Planning Policy Wales, Edition 12, (2024) Chapter 3 Access</p>	<p>Paragraph 3.50 states that;          “A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”</p> <p>Paragraph 3.6 advises that;          “Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.”</p>
<p>Planning Policy Wales, Edition 12, (2024) Chapter 3 Amenity</p>	<p>Paragraph 3.21 states that;          “The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity.”</p>
<p>Planning Policy Wales, Edition 12, (2024) Chapter 3 Design</p>	<p>Section 3 relates to design and Placemaking in action. It considers that good design makes 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.”</p> <p>Paragraph 3.4 goes on to state that;</p>

## Design, Access and Planning Statement

	<p>“Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future. For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales. These objectives can be categorised into five key aspects of good design”.</p> <p>Paragraph 3.8 considers design and green infrastructure and advises that: “Good design can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places. This embraces the principles of ‘ecosystems services’ and sustainable management of natural resources where multiple benefits solution become an integral part of good design.”</p>
<b>Guidance</b>	<b>Summary</b>
TAN 5 Nature Conservation and Planning	<p>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.</p> <p>Paragraph 1.6.1 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.’</p>
TAN 12 Design	<p>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, at every scale throughout Wales. Paragraph 5.5.1 of TAN 12 identifies that an understanding of landscape and townscape quality, including its historic character, is fundamental to the design process.</p> <p>The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings. Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.</p> <p>Paragraph 5.5.1 of TAN 12 states; “The distinctive settlement patterns which characterise much of Wales have evolved in part in response to the country’s diverse landscape and topography. The</p>

## Design, Access and Planning Statement

	<p>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.”</p> <p>Paragraph 5.8.1 states;          “The special qualities of the rural landscape and coastline of Wales should be recognised. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development.”</p> <p>Paragraph 5.8.2 states;          “Policies and guidance should take account of the need to steer activity to avoid negative impact on distinctive rural landscapes and the best agricultural land and to conserve and enhance diversity of species and habitats. Managing change by means of a landscaping strategy based on a thorough landscape assessment is one means of safeguarding a rural sense of place. This should analyse key issues and put forward guidelines for design themes, palettes of materials, and briefs for specific sites.”</p>
TAN 18 Transport	<p>TAN 18 has also been taken into consideration. The main 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.</p> <p>Paragraph 2.4 of TAN 18 identifies that the inter-relationship between land use planning and transport is complex and varied. The development of land is dependant, in part, upon transport infrastructure and services to function efficiently. By influencing the location, scale, density and mix of land uses and new development, land use planning can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport. TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p> <p>TAN 18 expands on the importance of accessibility in future developments. TAN 18 provides guidance on providing good accessibility with objectives such as; <i>“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;”</i> and; <i>“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;”</i></p> <p>TAN 18 focuses on ensuring future developments consider the importance of the relationship between land use and transport. TAN 18 places an emphasis on reducing the need to travel and the need to provide sustainable modes of transport such as cycling, walking and public transport.</p> <p>TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, particularly ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p>



## Design, Access and Planning Statement

TAN 20 Planning and the Welsh Language	<p>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. Changes introduced in the current version of TAN 20 are as a result of bringing into force provisions contained in the Planning (Wales) Act 2015.</p> <p>The main changes relate to the following matters:</p> <ul style="list-style-type: none"> <li>• The link between planning for the Welsh language through land-use planning and community planning;</li> <li>• Providing clarification that decision makers may take the language into account where it is material to the application;</li> <li>• Allow language impact assessments in certain specified circumstances, though in this case the site is allocated for housing so the impact of the proposed houses has already been assessed as part of the development plan process.</li> </ul>
TAN 24 The Historic Environment	<p>The purpose of this Technical Advice Note is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications that impact on the historic environment. It provides specific guidance on how the various aspects of the historic environment should be considered during this process.</p>
'Building Better Places – The Planning System Delivering Resilient and Brighter Futures'(July 2020)	<p>Emphasises the importance of where we live and the quality of the environment around us. This provides further emphasis on the 'Placemaking' principles and in particular the eight following issues that need to be resolved:</p> <ul style="list-style-type: none"> <li>• Staying local: creating neighbourhoods</li> <li>• Active travel: exercise and rediscovered transport methods</li> <li>• Revitalising our town centres</li> <li>• Digital places – the lockdown lifeline</li> <li>• Changing working practices: our future need for employment land</li> <li>• Reawakening Wales' tourism and cultural sectors</li> <li>• Green infrastructure, health and well-being and ecological resilience</li> <li>• Improving air quality and soundscapes for better health and well-being.</li> </ul>
Future Wales The National Plan 2040	<p>Future Wales provides evidence of the need for housing across Wales at both a national and regional level. This evidence demonstrates the need for a focus on increasing the delivery of social and affordable homes. The Welsh Government is targeting its housing and planning interventions towards achieving this aim within the broader context of increasing supply and responding to different needs, including our ageing society and climate change.</p>

## Local planning policy

4.5 The development plan consists of the Anglesey and Gwynedd Joint Local Development Plan (JLDP). The JLDP establishes a policy framework and makes provision for the development needs of the Counties of Anglesey and Gwynedd for the period from 2011 to 2026.

4.6 Relevant planning policies within the JLDP are listed in table 4.2.

## Design, Access and Planning Statement

**Table 4.2 Local planning policy**

Policy	Summary
Strategic Policy PS 2: Infrastructure and developer contributions	<p>The Councils will expect new development to ensure sufficient provision of essential infrastructure (either on-site or to service the site) is either already available or provided in a timely manner to make the proposal acceptable, by means of a planning condition or obligation.</p> <p>Where the essential, enabling, and necessary infrastructure is required as a consequence of a scheme and cannot be provided on site, financial contributions will be requested, within limits allowed by legislation, to get essential investment off site. If the effect of the development is cumulative, the financial contributions may be accumulated, within legislative constraints, to alleviate the cumulative effect.</p>
Policy ISA 5: Provisions of open spaces in new housing developments	<p>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 benchmark standards of 2.4 hectares per 1000 population.</p> <p>In exceptional circumstances, where it is not possible to provide outdoor playing spaces as an integral part of a new housing development, the developer will be required to:</p> <ol style="list-style-type: none"> <li>1. provide suitable off site provision which is close to and accessible to the development in terms of walking and cycling, or, where this is not feasible/practical; or</li> <li>2. Contribute financially towards new facilities including equipment, improving existing facilities on readily accessible sites or improving accessibility to existing open spaces.</li> </ol> <p>Developer contributions will be subject to a legal agreement in line with Policy ISA 1.</p>
Policy PCYFF 1: Development boundaries	<p>The Plan identifies Development Boundaries for the Sub-regional Centre, 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.</p> <p>Outside development boundaries development will be resisted unless it is in accordance with specific policies in this Plan or national planning policies or that the proposal demonstrates that its location in the countryside is essential.</p>
Policy PCYFF 2: Development Criteria	<p>A proposal should demonstrate its compliance with:</p> <ol style="list-style-type: none"> <li>1. Relevant policies in the Plan;</li> <li>2. National planning policy and guidance.</li> </ol> <p>Proposals should make the most efficient use of land, including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances or site constraints that dictate a lower density); must provide appropriate amenity space to serve existing and future occupants; should have regard to the</p>

## Design, Access and Planning Statement

	<p>generation, treatment and disposal of waste; includes, where applicable, provision for the appropriate management and eradication of invasive species.</p> <p>Additionally, 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; and land allocated for other development/uses.</p>
Policy PCYFF 3: Design and Place Shaping	All proposals will be expected to demonstrate high quality design which fully considers the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Innovative and energy efficient design will be particularly encouraged. Proposals, including extensions and alterations to existing buildings and structures will only be permitted provided they conform to all of the listed criteria.
Policy PCYFF 4: Design and Landscaping	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.
Policy PCYFF 6: Water Conservation	<p>Proposals should incorporate water conservation measures where practicable, including Sustainable Urban Drainage Systems (SUDS). All proposals should implement flood minimisation or mitigation measures where possible, to reduce surface water run-off and minimise its contribution to flood risk elsewhere.</p> <p>Proposals greater than 1,000 m<sup>2</sup> or 10 dwellings should be accompanied by a Water Conservation Statement. The application is for seven dwellings and does not need to be accompanied by a Water Conservation Statement.</p>
Strategic Policy PS 17: Settlement Strategy	<p>Housing development is distributed in accordance with the settlement strategy based on a settlement's level of service provision, function and size (population) and subject to its environmental, social and infrastructure capacity to accommodate development.</p> <p>22% of the Plan's Growth located within Local Service Centres.</p> <p>This will be through commitments and new allocations including allocating housing sites (open market housing with a proportion of affordable provision). In addition, windfall sites within the development boundary can be permitted.</p>
Policy TAI 2: Housing in Local Service Centres	In Local Service Centres such as Pentraeth, subject to the provision of affordable housing for local need, housing to meet the Plan's strategy will be delivered through housing allocations and suitable windfall sites within the development boundary.
Policy TAI 8: Appropriate housing mix	The Councils 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. Proposals should contribute to creating sustainable mixed communities by:

## Design, Access and Planning Statement

	<ol style="list-style-type: none"> <li>1. Maximising the delivery of affordable housing (including for local need) across the Plan area in accordance with Strategic Policy PS 18;</li> <li>2. Contributing to redress an identified imbalance in a local housing market;</li> <li>3. Ensuring the sustainable use of housing land, ensuring an efficient density of development compatible with local amenity in line with Policy PCYFF 3;</li> <li>4. Ensuring the correct mix of housing unit types and tenures to meet the needs of the Plan area's current and future communities;</li> <li>5. Making provision, as appropriate, for specific housing needs such as student accommodation, homes for the elderly, Gypsy &amp; Travellers, supported accommodation, nursing, residential and extra care homes, needs of people with disabilities;</li> <li>6. Improving the quality and sustainability of the existing housing stock;</li> <li>7. Ensuring high standards of design that create sustainable and inclusive communities in line with Policy PCYFF 3.</li> </ol>
Strategic Policy PS 18: Affordable housing	Development opportunities have been identified to provide a minimum target of 1,572 new affordable homes.
Policy TAI 15: Affordable housing threshold and distribution	<p>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 presented in Strategic Policy PS 18.</p> <ol style="list-style-type: none"> <li>1. Threshold Housing development, both new build and conversions, in settlements identified within the settlement hierarchy as shown in Strategic Policy PS 17 will be expected to make an affordable housing contribution in line with the threshold figures. Within local villages, housing developments of 2 or more units will be expected to make an affordable housing contribution.</li> <li>2. Percentage of affordable housing  A proposal including an alternative affordable tenure mix should yield a higher percentage of affordable provision subject to consideration of the following criteria: <ol style="list-style-type: none"> <li>i. All developments will be required to achieve an appropriate mix in terms of tenure, types and sizes of local need affordable housing, determined by the local housing market assessment or any alternative Council or partner assessment.</li> <li>ii. Affordable units should be fully integrated within a development and indistinguishable from non-affordable housing.</li> <li>iii. Where the viability of individual schemes fall short of the policy requirements specified, the onus will be on the applicant / developer / landowner to clearly demonstrate on a viability assessment pro-forma the circumstances justifying a lower affordable housing contribution or tenure mix.</li> <li>iv. Where, following the submission of a viability pro-forma, disagreement remains between the applicant / developer / landowner and the Local Planning Authority as to the affordable housing provision within a scheme, an independent external assessment of the scheme (e.g. by the District Valuers Service) will be undertaken at the applicant's expense.</li> </ol> </li> </ol>

## Design, Access and Planning Statement

	<p>The number of affordable housing provided will reflect the conclusion of this assessment.</p> <p>v. That there are suitable mechanisms in place to manage the occupation of the affordable housing unit(s) upon initial occupation, and in perpetuity, to those who can prove a need for an affordable dwelling.</p> <p>vi. If it can be demonstrated that there are no eligible occupiers for rural enterprise dwellings then the housing will be occupied by those eligible for consideration for affordable housing.</p> <p>vii. Extensions and adaptations to affordable housing will be permitted provided that the alterations or adaptations allow the house to remain as an affordable dwelling.</p> <p>viii. Dwellings are of a size, scale and design compatible with an affordable dwelling.</p> <p>ix. Within local, rural and coastal villages the affordable housing provision should only be for affordable housing for local need (as defined in the Glossary of Terms).</p> <p>Where the affordable housing requirement of a particular scheme falls below a single dwelling on the site, providing an affordable unit within that development will remain the priority.</p> <p>However, if it is deemed that this is not possible, a pro-rata payment will be expected rather than no affordable provision on the site.</p> <p>Affordable housing for local need in local villages is defined in the Glossary of Terms as follows:</p> <p>People in need of an affordable house who have resided within the Village or in the surrounding rural area for a continuous period of 5 years or more, either immediately before submitting the application or in the past.</p>
<p>Policy AT 2: Enabling Development</p>	<p>Enabling development which aims to secure the preservation and/or alternative use of a listed building or a building that makes a significant positive contribution to the character of a conservation area or a Registered Historic Landscape, Park and Garden will be granted provided all the following criteria can be met:</p> <ol style="list-style-type: none"> <li>1. It will not materially harm the heritage values of the heritage asset or its setting</li> <li>2. It avoids detrimental fragmentation of management of the historic asset.</li> <li>3. It will secure the long-term future of the heritage asset and, where applicable, it's continued use for a sympathetic purpose.</li> <li>4. It is necessary to resolve problems arising from the inherent needs of the heritage asset, rather than the circumstances of the present owner, or the purchase price paid.</li> <li>5. Sufficient subsidy is not available from any other source.</li> <li>6. It is demonstrated that the amount of enabling development proposed is the minimum necessary to secure the future of the heritage asset, and that it causes minimal harm to other public interests.</li> </ol>
<p>Strategic PS 1 Language and Culture</p>	<p>The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:</p>

## Design, Access and Planning Statement

	<ol style="list-style-type: none"><li>1. Requiring a Welsh Language Statement, which will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:<ol style="list-style-type: none"><li>a. Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq. m. or more; or</li><li>b. Residential development which will individually or cumulatively provide more than the indicative housing provision set out for the settlement in Policies TAI 1 – TAI 6; or</li><li>c. Residential development of 5 or more housing units on allocated or windfall sites within development boundaries that doesn't address evidence of need and demand for housing recorded in a Housing Market Assessments and other relevant local sources of evidence.</li></ol></li><li>2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development is on an unexpected windfall site for a large scale housing development or large scale employment development that would lead to a significant workforce flow;</li><li>3. Refusing proposals which would cause significant harm to the character and language balance of a community that cannot be avoided or suitably mitigated by appropriate planning mechanisms;</li><li>4. Requiring a bilingual Signage Scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies;</li><li>5. Expect that Welsh names are used for new developments, house and street names.</li></ol>
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## 5. Main considerations

### Principle of development

- 5.1 The proposed development subject to this application includes the erection of 25 dwellings together with associated development on land at Tan y Graig by Grwp Amos Cymru Cyf. The proposals are being presented as enabling development linked to the restoration of a grade II\* listed building known as Aberbrait, Llanfairpwll, which is also within the applicant's ownership.
- 5.2 Significant work needs to be carried out to the existing Listed Building at Aberbrait. Although the works required to bring the building back into use in an appropriate and sensitive manner now have the required Listed Building Consent, those works cannot be implemented as there is a substantial "Conservation Deficit" where the cost of repair of the heritage asset exceeds its market value on completion of repair or conversion.
- 5.3 To address the Conservation Deficit and ensure that the scheme of repair of the historic asset at Aberbrait is viable, a scheme for the erection of 25 dwellings at Tan y Graig, comprising of a mixture of open market and local market dwellings are proposed which would comprise of Enabling Development which will secure the listed building's long-term future by using the uplift in value of the land resulting from the development at Tan y Graig.
- 5.4 Pre-application discussions undertaken prior to the formulation of this planning application noted that due to the fact that the application site at Tan y Graig is located in open countryside, the Development Plan's policies would not support the development of open market and local market dwellings and consideration should therefore be given to Policy AT 2 of the Development Plan which supports Enabling Development that aims to secure the preservation and/or alternative use of a listed building provided the criteria within the Policy is satisfied. Pre-application discussions advised that the principle of a development proposal at Tan y Graig could be acceptable as enabling development, subject to compliance with policy AT 2 of the JLDP.
- 5.5 The application is accompanied by an Enabling Development Statement which details how the proposal complies with policy AT 2 of the JLDP along with national planning policy and guidance.

## Design, Access and Planning Statement

- 5.6 The Enabling Development Statement demonstrates that there is a genuine need for enabling development given the significant conservation deficit identified as a result of the restoration works required to the Grade II\* listed building at Aberlleiniog. These works already benefit from Listed Building Consent.
- 5.7 The proposals involve the full restoration of Aberbraint from its present semi derelict state to continue to use as three dwelling units within the main house. This is considered to be the most appropriate proposal which would not seek to change its use. The works involved are considered to be the minimal required without the need to extend and alter the property. The proposal is considered to be the most appropriate use for Aberbraint.
- 5.8 The extent of damage; decay and structural deterioration evident in the property make it clear that only through significant works and restoration can the heritage asset be secured. Alternatives, such as temporary works or basic works to make the property safe; wind and watertight in this case would not be sufficient to secure the heritage asset for the future as, without a viable use, the building would continue to deteriorate.
- 5.9 The Enabling Development Statement demonstrates a conservation deficit at Aberbraint of over £1 million, hence the justification for a form of enabling development.
- 5.10 Given that a need for enabling development is established due to the extent of the Conservation Deficit, the most appropriate type of enabling development must be considered having regard to the need to minimise harm to the heritage asset.
- 5.11 Guidance on enabling development suggests that although the enabling development does not necessarily need to be confined to the asset itself, located immediately adjacent or within the same curtilage, it may need to be reasonably nearby, and within the same ownership, for practical and planning reasons.
- 5.12 In this case, the applicant considered the potential for enabling development to be located on land within their control at Aberbraint, but in a location that would not detrimentally affect the setting of the heritage asset of Aberbraint. However, the land around Aberbraint lies within a Zone 3 Flood risk area, which would not support the development of highly vulnerable development such as residential including holiday use, which would provide the highest value development to meet the conservation deficit identified for Aberbraint.



## Design, Access and Planning Statement

- 5.13 Given that there is no opportunity to propose enabling development at the site at Aberbraint, the applicant looked into using other sites within their ownership, which includes Tan y Graig Farm at Pentraeth, which was acquired in 2021.
- 5.14 Whilst the site lies in an open countryside, located outside the development boundary of Pentraeth, it is located within a sustainable and accessible location, within walking distance from Pentraeth.
- 5.15 Whilst residential development at Tan y Graig would otherwise be contrary to adopted national and local planning policy, enabling development is defined as development that would secure the future of an important historic asset, but contravene other planning policy objectives. The principle of delivering a scheme of enabling development on a separate site around 5km away from Aberbraint, has been discussed with the LPA, which was considered acceptable.
- 5.16 In order to calculate the amount of enabling development that might be needed, development appraisals have been carried out looking at the costs of renovation and restoration and end market value of the heritage asset and development appraisal of the proposed enabling development which consists of the erection of 25 dwellings comprising of 10 local market dwellings and 15 open market dwellings.
- 5.17 The development appraisal includes the build costs for the new dwellings based on March 2024 prices and the applicant's direct experience of build costs on Anglesey. The valuation of the completed dwellings at Tan y Graig Farm from Dafydd Hardy values the development at £6,800,000. Deducting build costs including fees and finance this leaves a profit of £2,024,347.55 which would equate to a developer's profit of 29.8%. This would be sufficient to address and fund the conservation deficit at Aberbraint, which would be £1,007,241. Following funding this conservation deficit at Aberbraint from the developer's profit, this would reduce the developer's profit at Tan y Graig to 15%, which is considered a reasonable developer's profit.
- 5.18 An enabling development proposal can only be considered for approval if it provides benefits that outweigh the disbenefits, and where the decision-maker is confident that the scheme would secure the conservation of the heritage asset.
- 5.19 The consequence of not supporting the enabling development proposal, where the heritage asset has been damaged significantly, and deteriorated over decades to the point where the building has been listed on Cadw's buildings "at risk" register 10 years

## Design, Access and Planning Statement

ago, are that the continued deterioration cannot be reversed even with urgent and temporary remedial work.

- 5.20 A proven Conservation Deficit has been shown in detailed appraisals accompanying this application which show that the benefits of conserving the heritage asset outweigh the disbenefits of failing to comply with other planning policies. The Conservation Deficit can be addressed through a scheme of renovation and restoration of the existing heritage asset with the erection of 25 new local market and open market dwellings as per the proposals on the current planning application.
- 5.21 It is therefore considered that the proposal is appropriate in planning terms.

### Housing mix

- 5.22 Policy TAI 8 and the explanatory text requires an appropriate housing mix, stating that new housing development should include an appropriate balance and mix of house types and sizes, including, where applicable, affordable houses and for those who wish to self-build, to reflect identified demographic needs of the settlement. The policy also states that it is also important to address any under-provision which exists in the current range of housing stock in the settlement or area. Facilitating more balanced communities, comprising of a range of ages, household types and incomes may also help achieve wider social policy goals, such as maintaining and strengthening Welsh speaking communities.
- 5.23 Supplementary Planning Guidance (SPG) on 'Housing Mix' was adopted by the Councils in October 2018 and advocates a four-stage approach to the assessment of an appropriate housing mix within housing developments. These stages are considered in turn below:

#### Stage 1:

- 5.24 Stage 1 points towards an assessment of the evidence for supply and demand and need in the local community and with this in mind the explanatory text to JLDP Policy TAI 8 notes: *"The Councils will consider information from a variety of sources, which include Local Housing Market Assessment, Housing Needs Studies, Common Housing Register, Tai Teg Register, Elderly Persons' Accommodation Strategy, the 2011 Census and the 2011 Household Projections to assess the suitability of the mix of housing in terms of both type and tenure proposed on development sites."*

## Design, Access and Planning Statement

- 5.25 In this case the applicants have reviewed the aforementioned sources and a summary of the main findings is provided below.
- 5.26 The Anglesey Local Housing Market Assessment (LHMA) Update 2016 notes that in 2011 the average household size of 2.25 compares to an average of 2.9 bedrooms per household on Anglesey according to the 2011 Census. The 2011 Census also indicates that 2.3% of households on Anglesey had fewer bedrooms than they required (compared to 3.0% across Wales).
- 5.27 In terms of accommodation profile, the LHMA notes that Anglesey contains more detached houses and fewer flats than the national average. The most common property type on Anglesey is detached houses followed by terraced dwellings.
- 5.28 Since 2001, however the LHMA notes that the number of purpose-built flats has increased markedly on Anglesey by 30.9%. The change in the number of houses has been less notable, although semi-detached properties have recorded the biggest rise (16.9%).
- 5.29 The LHMA makes recommendations to improve the housing balance on Anglesey with the key findings being as follows:
- Household population will rise by 2,420 by 2026 and by 3,960 by 2033, which equates to 220 households per year.
  - In terms of the accommodation required to provide better balance over the plan-period, of the new housing required up to 2026, 70% should be market, 3% shared ownership/help-to-buy, 17% intermediate rent and 10% social rented. The new housing required by 2033 should be 73% market, 3% shared ownership/help-to-buy, 17% intermediate rent and 7% social rented.
  - The LHMA also indicates that new market accommodation should principally be two, three- and four-bedroom homes with a range of dwelling sizes required in the affordable sector.
  - The size of new social rented accommodation required is:
    - One bedroom = 28.9%
    - Two bedroom = 16.3%
    - Three bedroom = 11.1%
    - Four or more bedrooms = 43.8%
  - The size of new discount sale accommodation requires is:
    - One bedroom = 35.4%
    - Two bedrooms = 35.4%

## Design, Access and Planning Statement

- Three bedrooms = 25.1%
  - Four or more bedrooms = 4.1%
- 5.30 The above data suggests that there is a need for two, three and four-bed market housing.
- 5.31 The proposed development would provide a mixture of two, three and four-bed houses and dormer bungalows in the form of a mix of open market and local market housing.
- 5.32 The applicant has undertaken discussions with a local estate agent in relation to the type of housing that is required and in demand in the area of Pentraeth. The proposed mix of housing provides a good mixture of a range of properties which corresponds with the mix of need identified by the local estate agent.
- 5.33 The new guidance published by Welsh Government, Building Better Places, emphasises the importance of health and well-being moving forward from the Covid-19 pandemic. The guidance notes the importance of building homes that will last a lifetime and be made resilient and adaptable to future pandemics should they occur again. The guidance states that moving forward, homes need to be “great places to live”. The proposal seeks to provide a mix of dwellings that would contribute towards providing high quality homes that are capable of being resilient and adaptable in the future, whilst also being located in a sustainable and accessible location.

### Stage 2:

- 5.34 The Stage 2 assessment as advocated by the Housing Mix SPG refers to other considerations, for example size and location of the site. The application site lies on the outskirts of Pentraeth in an open countryside location, but directly adjoins a cluster of residential dwellings known as Tan y Graig cottages. These comprise of a mixture of single and two-storey properties, predominantly as terraced properties. Residential properties in Pentraeth itself comprises of mixture of two storey, dormer and bungalow properties in the form of detached, semi-detached and terraced properties.
- 5.35 The proposal would provide a mix of detached and semi-detached properties being two-storey houses and dormer bungalows. This would complement the existing mix of housing nearby at Tan y Graig cottages and in Pentraeth itself.
- 5.36 Policy PCYFF2 states that to make efficient use of land, residential developments should achieve a minimum density of 30 units per hectare unless there are local

## **Design, Access and Planning Statement**

circumstances or site considerations that dictate a lower density. In this case, the site measures 1 ha in area and the number of units proposed 25, which equates to a slightly lower density than the required density of 30 dwellings per hectare.

- 5.37 Given the site's location on the outskirts of the village in the open countryside adjoining a cluster of existing dwellings, a lower density is considered to be appropriate.

### **Stage 3:**

- 5.38 Stage 3 of the assessment as set out in the Housing Mix SPG points developers towards discussion with the Local Planning Authority and with housing authorities before submitting a planning application.
- 5.39 Pre-application discussions with the LPA have been undertaken and no feedback was received in relation to housing mix. Discussions have been undertaken with a local estate agent when formulating the proposed housing mix for the scheme. The wide variety of house sizes proposed would contribute towards creating sustainable communities.

### **Stage 4:**

- 5.40 Finally, the Stage 4 assessment as advocated by the Housing Mix SPG points towards submission and assessment of the planning application. The application is currently subject to pre-application consultation prior to the formal submission of the planning application.

## **Summary and conclusion**

- 5.41 In summary, the housing mix has been derived and also provides the information expected in a Housing Statement and a Housing Mix Schedule as set out in the Housing Mix SPG (2018).
- 5.42 The proposed development has addressed the Plan's objectives, and Policy TAI 8 in particular, stating how the proposed development contributes to maintaining or creating mixed and balanced communities, providing two-, three- and four-bed open market and local market units.
- 5.43 In all respects therefore, the proposal complies with JLDP Policy TAI 8 and with the Housing Mix SPG.

## Residential amenity

- 5.44 During the development of the proposed layout, consideration has been given to the guidance set out in Supplementary Planning Guidance 'Design Guide for the Urban and Rural Environment'.
- 5.45 Dwellings have been positioned so that there is sufficient distance between dwellings to ensure overlooking would not occur.

## Landscape and trees

- 5.46 At present, there is a mixture of Blackthorn and Hawthorn hedges along the site's frontage, with some scrub along the site's eastern boundary and Buddleia and Blackthorn shrubs to the west. There are some sparse Willow, Blackthorn and Hawthorn shrubs on a soil bund along the northern boundary. These are proposed to be retained with additional landscape planting proposed by way of native hedging between plots 1 to 7 and some native hedging to be planted within the scheme to the front of other dwellings.
- 5.47 Tree planting by way of Silver Birch and Mountain Ash are proposed to be planted scattered around the site as soft landscaping along with grassed gardens and open areas around the site including around the drainage basin and the pedestrian link from the site onto the B5109.
- 5.48 Timber fencing is proposed as a boundary treatment between residential gardens.

## Biodiversity

- 5.49 The application is accompanied by a Preliminary Ecological Assessment which was undertaken in April 2022 along with an update letter from the ecologist regarding the validity of the earlier ecological report.
- 5.50 Whilst implementing the consent for the 15 holiday chalets, the site has been stripped of all topsoil leaving bare earth. The letter from Ecoscope confirms that the site is not of any significant ecological value. Hedgerow site boundaries are retained by the new proposal which uses the existing access. No further ecological survey work is considered necessary.

## Design, Access and Planning Statement

- 5.51 Local and national planning policy recommends that all developments must show a biodiversity net gain wherever possible. The Ecological update letter considers that this can easily be achieved by implementing the enhancement measures recommended in the earlier report for the 15 holiday consent. The enhancement recommendations are repeated below:
- 5.52 Boundary hedgerows are unmanaged and dense, providing corridors for wildlife between adjacent habitat. A strategy to maintain dense hedgerows must be implemented, particularly where a new access route to the main road is considered.
- 5.53 In conjunction with a hedgerow strategy, a lighting diagram should be provided before external lighting is installed. Lighting must be at low level and directional, affording sufficient visibility for safety but minimising light spill to site boundaries and compliant with best practice Ecological Guidance on lighting.

## Drainage

- 5.54 Policy PCYFF 6 'Water Conservation' of the JLDP identifies the need for proposals to incorporate. The application is accompanied by a Drainage Strategy and drainage proposals.

## Surface water

- 5.55 Re-use of surface water will be considered where possible. Porosity testing has been undertaken and the ground conditions are not deemed feasible to dispose of surface water through soakaways. Surface water would be disposed to an attenuation pond to the east of the site.

## Foul water

- 5.56 Foul water is proposed to be disposed to the existing public sewage system.

## Welsh language

- 5.57 Policy PS1 'Welsh language and culture' advises that the Councils will promote and support the use of the Welsh language in the Plan area. In accordance with the Supplementary Planning Guidance 'Maintaining and creating distinctive and sustainable communities', as the application site is a windfall site and is for a large

## Design, Access and Planning Statement

scale housing development, the application is accompanied by a Welsh Language Impact Assessment.

- 5.58 Given that the proposed development would be for 25 open market and local market dwellings affordable dwellings to meet an identified need, it would provide suitable housing to help meet the demand for housing within the local area, encouraging local people to remain within the local area as their housing needs would be able to be met locally and creating sustainable communities where the Welsh language can thrive.
- 5.59 Providing housing within this location offers the possibility for local people to be located within easy access to Pentraeth, as well as nearby settlements such as Menai Bridge, Llangefni and the regional centre of Bangor, and all of the services and facilities provided therein. This reduces the need to be dependent on private transport.
- 5.60 The proposal is expected to beneficially contribute towards the visual elements of the Welsh language in the local area by including a Welsh name with a connection to the local area.
- 5.61 Whilst the proposal relates to housing, it also provides the opportunity to beneficially contribute towards local employment during construction, supporting local construction businesses.
- 5.62 It is concluded that the proposed development would have an overall neutral effect on the Welsh language and the community of Pentraeth through the provision of a mixture of open market and local market housing to meet an identified need which would be of a price which is affordable to local people.

## Financial contributions

- 5.63 As the proposal is being presented as an enabling development proposal, the extent of profit from the proposal will fill the conservation deficit in relation to the restoration of Aberbraint. Therefore, it would not be viable for the proposal to provide financial contributions. Further discussions with the LPA are expected to be undertaken during the determination of the planning application.



## 6. Other design considerations

- 6.1 Policy PCYFF 3 of the JLDP states that development should complement and enhance the character and appearance of the site in terms of siting, appearance, scale, height, massing and elevation treatment.

### Appearance and materials

- 6.2 The proposed dwellings would provide a mix of two-, three- and four-bed houses and dormer bungalows in the form of detached and semi-detached dwellings.
- 6.3 Elements from the surrounding properties have been combined to develop a modern but complimentary proposal to this brownfield site with materials to include render and cladding to walls, natural slated roof with UPVC windows and doors.

### Environmental sustainability

- 6.4 Careful consideration has been given to sustainability of the proposed development, in accordance with policy PS5 of the JLDP.
- 6.5 The dwellings would be constructed to a high standard of energy efficiency.
- 6.6 Suitable methods of drainage have been explored and the scheme utilises sustainable drainage methods for surface water disposal and foul drainage within the area. Water conservation features are incorporated.
- 6.7 The proposal ensures the safety and amenity of the public and safeguards the environment from the adverse effects of pollution of water, land or air, hazards from industry, and associated noise, odour or vibration arising from the development.
- 6.8 The proposal helps to secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area with the added economic benefits of employment during the construction phase.

### Community safety

- 6.9 The proposed development has been designed with the safety and well-being of future residents being a key consideration as well as the need to protect and enhance the safety of the surrounding community.

## **Design, Access and Planning Statement**

- 6.10 The development would be easily accessible by private and public transport, as outlined within section 7 of this report, with the nearest bus stop located within 450m from the application site (along Bron Ffinan) and around 500m along the A5025.

## 7. Accessibility

### Planning policy

- 7.1 The relevant national policies and guidance relating to accessibility are set out within:
- Planning Policy Wales, Edition 12, (2024); and
  - Technical Advice Note 18 'Transport' (2007).
- 7.2 The relevant planning policies within the adopted LDP are as follows:
- Policy PS 4: Sustainable transport, development and accessibility; and
  - Policy TRA 2: Parking standards.

### Movement to, from and within the development

- 7.3 Vehicular access into the site is proposed via an existing vehicular access from the B5109 which has been constructed in accordance with plans approved as part of planning permission 46C6N for 15 holiday chalets at the site. no alterations are proposed to the existing access.
- 7.4 An internal access road is proposed that would provide safe access for vehicles as well as for pedestrians. This would be designed to adoptable standard. A pedestrian access link would be provided towards the south-eastern corner of the site, linking to the pedestrian pavement that would run along the site's frontage and connecting with an existing pavement along the B5109, providing safe pedestrian access into Pentraeth.
- 7.5 Car parking spaces will be provided to the front of the proposed dwellings. The proposal includes the formation of internal access road with adequate turning space to allow site users to enter and leave the site in a safe manner.
- 7.6 The application is accompanied by a Transport Statement. A speed survey was undertaken to assess the traffic speeds on the B5109 and this has used to determine the design speed for the road and the required visibility splays. The site access can provide visibility splays that comply with the requirement of TAN 18.
- 7.7 The site is in a suitable location for access by sustainable transport. The proposal includes a footway along the frontage of the site to link with the existing footway linking the site with Pentraeth.

## Design, Access and Planning Statement

- 7.8 The Transport Statement advises that the anticipated traffic generation for the morning peak and afternoon peak periods is expected to have a negligible impact on traffic capacity of the adjacent highway network.
- 7.9 The road safety record for the section of B5109, the road that will provide access to the site, is considered to be excellent but it was noted that there were injury accidents in the wider road network. The traffic from the proposed development is predicted to be negligible and it was therefore concluded that the potential for a worsening in the road safety record is not anticipated for the proposed residential development. Swept path analysis has demonstrated that a refuse vehicle is able to access and leave the site in forward gear.
- 7.10 The Transport Statement has demonstrated the traffic impact of the proposed development would have negligible effect on the operation or capacity of the local highway network and combined with the excellent road safety record within the local highway network, then this should mean on highway and traffic grounds the application for the proposed residential development scheme should be approved.
- 7.11 In terms of construction traffic, a Construction Traffic Management Plan will be submitted to the Local Planning Authority to consider and approve prior to the commencement of development.

## Sustainability

- 7.12 PPW supports the transport hierarchy, which prioritises sustainable means of transport, including walking, cycling and public transport, over travelling by private car. TAN 18 encourages development to take place in areas which would reduce car dependency and increase social inclusion.
- 7.13 At a local level, Policy PS 4 advises that development will be located so as to minimise the need to travel.
- 7.14 The Active Travel (Wales) Act 2013 focuses on walking and cycling as a mode of transport and highlights the importance of planning and building walking and cycling infrastructure as well as encouraging behaviour change in Wales.
- 7.15 The site is located within easy walking distance of a bus route linking the village with Menai Bridge, Bangor and Cemaes and other destinations along the route and also

## Design, Access and Planning Statement

allowing links with other destinations further afield. The nearest bus stops are located around a 450m and 500m walk away along Bron Ffinan and the A5025.

- 7.16 Further details regarding the site's accessibility is provided in chapter 3 of the Transport Statement. Access to the site by foot and public transport ensures that future occupiers are not reliant on car ownership.
- 7.17 It is considered that the application site complies with planning policy aims in terms of locating development in location accessible by all means of transport to ensure sustainable development. Therefore, it is considered that the site and the proposed development will be accessible to its future occupiers.

## Parking

- 7.18 Each dwelling is served by two or three parking spaces, with all two-bedroom dwellings providing two off-street car parking spaces and the three and four-bed dwellings providing a minimum of two car parking spaces. This is in accordance with the requirements as set out in the SPG in relation to parking which requires a maximum of 1.5 spaces plus 0.5 communal space or two spaces for two-bed dwellings and three car parking spaces for three- and four-bed dwellings. The site also offers opportunity to travel by non-car transport modes and encourage residents to choose to travel by sustainable modes.
- 7.19 The proposed car parking provision is therefore considered appropriate within the context of the site and its sustainable location.

## 8. Conclusion

- 8.1 The proposed development relates to the erection of 25 dwellings, comprising of 10 local market dwellings and 15 open market dwellings. The proposal would offer a mix of two-, three- and four-bed dwellings which would meet an identified need locally for housing.
- 8.2 The application is presented as enabling development linked to funding the conservation deficit for restoration works at Aberbrait, Llanfairpwll which is a Grade II\* listed building also within the ownership of Grŵp Amos Cymru Cyf.
- 8.3 Significant work needs to be carried out to the existing Listed Building at Aberbrait. Although the works required to bring the building back into use in an appropriate and sensitive manner now have the required Listed Building Consent, those works cannot be implemented as there is a substantial “Conservation Deficit” where the cost of repair of the heritage asset exceeds its market value on completion of repair or conversion.
- 8.4 To address the Conservation Deficit and ensure that the scheme of repair of the historic asset at Aberbrait is viable, a scheme for the erection of 25 dwellings at Tan y Graig, comprising of a mixture of open market and local market dwellings are proposed which would comprise of Enabling Development which will secure the listed building’s long-term future by using the uplift in value of the land resulting from the development at Tan y Graig.
- 8.5 An enabling development proposal can only be considered for approval if it provides benefits that outweigh the disbenefits, and where the decision-maker is confident that the scheme would secure the conservation of the heritage asset.
- 8.6 The consequence of not supporting the enabling development proposal, where the heritage asset has been damaged significantly, and deteriorated over decades to the point where the building has been listed on Cadw’s buildings “at risk” register 10 years ago, are that the continued deterioration cannot be reversed even with urgent and temporary remedial work.
- 8.7 A proven Conservation Deficit has been shown in detailed appraisals accompanying this application which show that the benefits of conserving the heritage asset outweigh the disbenefits of failing to comply with other planning policies. The Conservation Deficit can be addressed through a scheme of renovation and restoration of the existing

## **Design, Access and Planning Statement**

heritage asset with the erection of 25 new local market and open market dwellings as per the proposals on the current planning application.

- 8.8 It is therefore considered that the proposal is appropriate in planning terms.
- 8.9 As demonstrated throughout this report, we consider the proposal to be in accordance with the adopted policies within the JLDP, as well as the overarching principles of the PPW and the new national guidance Building Better Places. We therefore consider that the proposed development is acceptable.

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