

PLANNING SUPPORT STATEMENT

Proposed erection of 10 no. affordable dwellings and associated development
at
Former Ysgol Babanod Coed Mawr, Bangor, Gwynedd, LL57 4TW

Prepared on behalf of
Cyngor Gwynedd Council



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Agents Ref: - 1607/11/23



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PLANNING SUPPORT STATEMENT

FORMER YSGOL BABANOD COED MAWR, BANGOR, GWYNEDD, LL57 4TW: PROPOSED ERECTION OF 10 NO. AFFORDABLE DWELLINGS AND ASSOCIATED DEVELOPMENT

1.0 INTRODUCTION

- 1.1 The purpose of this Planning Support Statement is to examine the proposal and the key material considerations for it, including relevant planning policy. Overall, it is clear that the development would utilise a vacant previously developed site to provide a housing scheme that is suited to its setting and context within Bangor to accommodate a development targeted at meeting the affordable housing need for the locality.
- 1.2 As a result, it will make a valuable and significant contribution to addressing the currently un-met need in the locality, and on a highly accessible site within a key local settlement. The scheme is also suited to the site and locality in terms of its layout, density, and design approach, and would have an acceptable impact upon residential and general amenities, the operation and safety of the highway, biodiversity & ecology, trees, the Welsh Language, and all other acknowledged interests.
- 1.3 This proposal follows an earlier one which was approved on the 13/04/2023 under permission ref:- C22/0525/11/LL. The scheme has been subject to design changes to address drainage requirements, with the layout of the development changed as a result. Therefore, the Applicant must, of course, apply for a new permission for the development as it materially differs from that previously approved. However, the overall number of properties is unchanged as is the tenure of the proposed dwellings.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The site is situated within the south-western section of Bangor, within the residential area set between Caernarfon Road and Penrhos Road, just off Ffordd Coed Mawr.
- 2.2 The site is currently vacant, having been previously occupied by Ysgol Babanod Coed Mawr, which was recently demolished. As such, the site now contains the remains of the building and its associated hardstandings, together with the soft landscaped area that were set around the school.
- 2.3 The site is mainly defined on its frontage/north-western edge by fencing & gates that separate the site from Bron-y-De, which is the highway and associated footway that serves the site. Opposite are no's 1 & 3 Bron-y-De, which are set above the site. The remainder of the boundary is formed by other boundary treatments that separate the site from the rear of no's 5 & 7 Bron-y-De that abut the site.
- 2.4 Varying boundary treatments also form the southern edge of the site and separate it from numbers 1-9 Lon-y-Bedw, whose amenity areas abut the site.
- 2.5 Fencing defines the eastern edge of the site and separates it from the rear gardens of no's 2-16 Toronnen, which are set to the south and below the site.
- 2.6 Finally, the northern/north-eastern edge of the site is also defined by fencing that separates it from the rear and side gardens of no's 29-39 Ffordd Coed Mawr.
- 2.7 From the above it can clearly be seen that the site is set amongst existing residential development in the heart of Bangor, and that it presently offers little to the area following the demolition of the school.

3.0 PROPOSED DEVELOPMENT

3.1 The proposal is a full application for the erection of 10 affordable dwellings and associated development on the application site. The proposal includes the following development:-

- The erection of 10 no. affordable dwellings of various sizes (see proposed plans);
- Provision of associated off-road parking to serve the above;
- Formation of garden areas, hard paved areas, and curtilages to serve the above;
- Alterations to the existing entrance serving the site and provision of a roadway and pedestrian footways within the site, together with visitor parking spaces;
- Hard and soft landscaping as per the submitted details, inclusive of the removal of existing trees & vegetation where required;
- Creation of a children's play area;
- Installation of a foul drainage system to serve the proposed dwellings, and a surface water drainage system to serve the proposed dwellings and roadway as per the submitted details;
- Other associated minor development as per the submitted documents.

3.2 The proposal seeks consent for intermediate affordable dwellings, which are being developed by Gwynedd Council through their Ty Gwynedd arm in order to meet an identified gap in this form of provision within the plan area. This approach has been adopted by the Authority as they have identified a gap in provision of affordable homes, with properties being provided at present comprising mainly social rented units (provided by Housing Associations) or a smaller amount of discounted/intermediate affordable housing provided by developers. This has left a gap for those requiring a shared ownership arrangement that the Applicant is well placed to fill. If approved, the houses would be made available on a shared ownership basis, with qualifying occupiers able to purchase the majority of the value of the dwelling (setting their mortgage at a substantial discount from open market value and thus ensuring that it is affordable), with the remaining value held by the Authority. This would ensure their long-term affordability for the occupiers, and the retained equity for Authority would guarantee that they provide a resource for the community for decades to come.

3.3 The school that previously occupied the site has been demolished prior to this scheme advancing (under decision ref:- C21/0125/11/HD issued on the 19/03/2021). It was no longer required as primary provision was reorganised within Bangor with Ysgol y Garnedd established and Ysgol y Faenol modernised and improved to replace the provision on this site and on other sites within the town. As such the site is currently a vacant previously-developed/brownfield site, which although tidy offers little to the area in terms of amenity or function.

3.4 As part of the submission the following documents have been supplied which detail the development proposed:-

Existing plans as follows:-

- Location plan - Ref:- A.00.02 - Scale:- 1:1250 @ A4
- Existing site plan - Ref:- A.01.02 - Scale:- 1:200 @ A1;

Proposed plans as follows:-

- Proposed Site Layout - Ref:- A.00.01 - Scale:- 1:200 @ A1
- Proposed layout (floor plans and elevations - plots 1 and 2) - Ref:- A.02.01 - Scale:- 1:50 & 1:100 @ A1
- Proposed terrace GF (ground floor plan - plots 3, 4 and 5) - Ref:- A.02.2 - Scale:- 1:50 @ A2
- Proposed terrace FF (first floor plan - plots 3, 4 and 5) - Ref:- A.02.3 - Scale:- 1:50 @ A2
- Proposed second floor/roof space plan - plots 3, 4 and 5) - Ref:- A.02.4 - Scale:- 1:50 @ A3
- Proposed terrace elevations (plots 3, 4 and 5) - Ref:- A.02.5 - Scale:- 1:100 @ A2
- Proposed terrace GF (ground floor plan - plots 6, 7 and 8) - Ref:- A.02.10 - Scale:- 1:50 @ A2
- Proposed terrace FF (first floor plan - plots 6, 7 and 8) - Ref:- A.02.11 - Scale:- 1:50 @ A2
- Proposed second floor/roof space plan - plots 6, 7 and 8) - Ref:- A.02.12 - Scale:- 1:50 @ A3
- Proposed terrace elevations (plots 6, 7 and 8) - Ref:- A.02.13 - Scale:- 1:100 @ A2
- Proposed layout (floor plans and elevations - plots 9 and 10) - Ref:- A.02.15 - Scale:- 1:50 & 1:100 @ A1

Drainage documents as follows:-

- Geotechnical, Ground Permeability and Contamination Investigation Report - Ref:- E1321.GGCI.R1 - Dated:- February 2021
- Geotechnical, Ground Permeability and Contamination Investigation Report - Appendices 2 - 6 - Ref:- E1321.GGCI.R1 - Dated:- February 2021
- Surface water Drainage Model - Ref:- 5318-CAU-XX-XX-CA-C-060 - Dated:- 27/02/2024
- Surface water Drainage Model - Ref:- 5318-CAU-XX-XX-CA-C-060 - Dated:- 27/02/2024
- Foul and surface water drainage layout - General Arrangement - Ref:- 5318-CAU-XX-XX-DR-C-1600 - Rev. P02 - scale:- 1:200 @ A2
- SAB Surface water drainage layout - Sheet 1 - Ref:- 5318-CAU-XX-XX-DR-C-1601 - Rev. P02 - scale:- 1:100 @ A2
- SAB Surface water drainage layout - Sheet 2 - Ref:- 5318-CAU-XX-XX-DR-C-1602 - Rev. P02 - scale:- 1:100 @ A2
- Drainage Construction details - Sheet 1 - Ref:- 5318-CAU-XX-XX-DR-C-5600 - Rev. P01 - scale:- As shown @ A1
- Drainage Construction details - Sheet 2 - Ref:- 5318-CAU-XX-XX-DR-C-5601 - Rev. P01 - scale:- As shown @ A1
- Drainage Construction details - Sheet 3 - Ref:- 5318-CAU-XX-XX-DR-C-5602 - Rev. P01 - scale:- As shown @ A1
- Drainage schedules and notes - Ref:- 5318-CAU-XX-XX-DR-C-7600 - Rev. P02 - scale:- As shown @ A1

- Existing surface water drainage layout - Ref:- 5318-CAU-XX-XX-SK-C-0101 - Rev. P02 - scale:- 1:200 @ A2
- Existing drainage calculations - Dated:- 21/02/2024
- Existing drainage calculations - Dated:- 21/02/2024

Landscape documents as follows:-

- Landscape general arrangement - Ref:- 664-STO-00-00-DR-L-0005 P02 - Scale:- 1:200 @ A1

Other documents as follows

- Ecological survey report - Ysgol Coed Mawr, Bangor - Dated:- 25/03/2024;
- Biodiversity Enhancement Plan and Green Infrastructure Statement - Ysgol Coed Mawr, Bangor - Dated:- 21/02/2024;
- Arboricultural Impact Assessment - Ref:- RTA.30.01 - Version 2.0 - Dated:- January 2023 - inclusive of:-
 - Tree Constraints Plan - Ref:- D.RTA.30.01 - Scale:- 1:500 @ A3
 - Tree Implications and Protection Plan - Ref:- D.RTA.30.02_B - Scale:- 1:500 @ A3
- Planning Support Statement - Ref:- 1607/11/23 - Dated:- April 2024;
- Design & Access Statement - Ref:- 1607/11/23 - Dated:- April 2024;
- Community & Linguistic Statement - Ref:- 1607/11/23 - Dated:- April 2024;
- Housing Needs & Affordable Housing Statement - Ref:- 1607/11/23 - Dated:- April 2024;
- Water Conservation Statement - Ref:- 1607/11/23 - Dated:- December 2023.

3.5 As the proposal constitutes a 'Major Development' it will be subject to statutory pre-application consultation. Details of the responses received and an explanation of the manner in which these have been addressed will be provided in the Pre-Application Consultation (PAC) Report submitted as part of the application as per the DMPW (Amendment) Order 2016 (as amended) requirements.

3.6 This proposal follows an earlier one which was approved on the 13/04/2023 under permission ref:- C22/0525/11/LL. The scheme has been subject to design changes to address drainage requirements, with the layout of the development changed as a result. Therefore, the Applicant must, of course, apply for a new permission for the development as it materially differs from that previously approved. However, the overall number of properties is unchanged as is the tenure of the proposed dwellings. As such, many of the considerations in this case are the same as for those in the previous and so the scheme should prove to be equally acceptable.

4.0 PLANNING POLICY CONTEXT

4.1 There are a number of policies relevant to this proposal. These are briefly detailed below, with the following section summarising the key material considerations for the proposal and referring to the relevant policy where required:-

NATIONAL PLANNING POLICY

Planning Policy Wales (PPW) 12th Ed. (2024)

4.2 The following chapters and paragraphs are of relevance as they set out policy requirements in respect of key material considerations that impact upon this application:-

4.3 Chapter 2 of PPW brings into policy the concept of Placemaking which is considered to be fundamental to the goals of the planning system. The key principles underlying placemaking are set out in this section.

4.4 Chapter 2 also sets out, and in particular Figures 4 and 5 and the accompanying text, the general planning and sustainable place marking principles which are intended to underpin decision making for all development. In particular the principles of:-

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating accessible and healthy environments
- Creating and sustaining communities
- Maximising environmental protection and limiting environmental impact

4.5 Turning to the National Sustainable Placemaking Outcomes (Figure 5) the following are particularly:-

Creating and Sustaining Communities

- Enabling the Welsh Language to thrive
- Appropriate development densities
- Homes and jobs to meet society's needs
- Community based facilities and services

Making Best Use of Resources

- Makes best use of natural resources
- Prevents waste
- Prioritises the use of previously developed land and existing buildings
- Unlocks potential and regenerates
- High quality and built to last

Maximising Environmental Protection and Limiting Environmental Impact

- Resilient biodiversity and ecosystems
- Distinctive and special landscapes

- Integrated green infrastructure
- Appropriate soundscapes
- Reduces environmental risks
- Manages water resources naturally
- Clean air
- Reduces overall pollution
- Resilient to climate change
- Distinctive and special historic environments

Facilitating Accessible and Healthy Environments

- Accessible and high-quality green space
- Accessible by means of active travel and public transport
- Not car dependent
- Minimises the need to travel
- Provides equality of access
- Feels safe and inclusive
- Supports a diverse population
- Good connections
- Convenient access to goods and services
- Promotes physical and mental health and well-being

- 4.6 Key objectives and requirements for good design are set out in para's 3.3-3.16 with key themes being inclusivity & accessibility (3.5-3.6), environmental sustainability (3.7-3.8), character & context (3.9-3.10, 3.14), community safety (3.11), movement (3.12-3.13).
- 4.7 Para's 3.15 & 3.16 provide guidance on how to consider issues of design, requiring Authorities to have policies and guidance to promote good design and provide a robust basis for refusal of poor-quality design. This work should also take place for strategic issues including plan allocations. When considering design an Authority is required to seek to improve poor or average designs, and to reject them where they are not successful with clearly articulated grounds required in any refusal. However, it is clearly stated that *"they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions"*.
- 4.8 Para's 3.19-3.24, and in particular 3.22, highlight the importance of ensuring that healthy and active lifestyles are provided for a wide range of communities and people, both through improving urban areas, and also making appropriate use of the rural environment.
- 4.9 Para's 3.25-3.29 identify the importance of the Welsh Language and requires LPAs to consider the likely effects of development upon the Welsh Language and include policies within the LDP's assessing impacts.
- 4.10 Para's 3.41-3.52 guide authorities to produce spatial strategies that support objectives of minimising travel and improving access by non-car modes of transport. In particular a balance is sought on locating various types of development in urban and rural areas with an emphasis on placing major generators of travel demand within urban areas where they are accessible by non-car modes of transport.

- 4.11 In particular para's 3.51 & 3.52 encourage higher density development in urban centres and near to public transport nodes and interchanges.
- 4.12 Section 3.55-3.56 and the accompanying definition are relevant as the application concerns a previously developed site.
- 4.13 Section 4.1 provides overarching guidance on issues of relevance to transport, with a key priority being to enable more sustainable travel, utilise existing capacity effectively, and managing demand (in particular by reducing reliance upon the use of private cars).
- 4.14 Para's 4.1.9-4.1.18 set out details of the preferred approach to reducing car use, through facilitating development in accessible locations, and utilising the transport hierarchy - which prioritises walking and cycling and then public transport over ULE and other private vehicles.
- 4.15 Para's 4.1.19-4.1.25 provide a considerable amount of guidance on creating active and social streets that are well designed and people orientated as this is seen to be a key driver of sustainability. Streets are required to give a high priority to their role as public spaces and to the needs of pedestrians, cyclists, and public transport. A break from engineering lead design standards is advocated and more green infrastructure integration. Reference is also made to other Welsh Government policy and Manual for Streets 1 and 2. This is also picked up in para's 4.1.44-4.1.45 in terms of traffic management and the role of street design in this.
- 4.16 Detail on policy concerning active travel is set out in para's 4.1.26-35, setting out the duty placed on Authorities to identify and plan for this issue through protection and improvement of existing infrastructure and routes, and provision of new infrastructure where required. There is also a priority placed on LPAs to ensure that development accounts for and integrates with active travel principles and networks, and where required contributes to the improvements of existing routes and provides new ones as well as providing supporting infrastructure within the development (e.g. cycle parking and changing areas etc.).
- 4.17 There is clear guidance (in para's 4.1.36-4.1.39) on directing development in urban and rural areas to sites that are most accessible by public transport, with highly accessible sites in urban areas to be utilised at higher-densities and where appropriate with mixed uses.
- 4.18 Para's 4.1.49-4.1.54 set out a general approach to car parking, with an emphasis on reducing parking levels wherever possible to take account of the accessibility of sites by other modes.
- 4.19 Section 4.2 sets out overarching policy and strategy on housing and key issues, with the key priorities being to:- deliver an adequate supply of housing land to meet needs of communities across all tenures; providing well-designed, sustainable, and good quality housing in all tenures to meet the community's needs; and focusing upon the delivery of an identified housing requirement and the required land supply.

- 4.20 Para. 4.2.17 directs Authorities to maximise the use of previously developed and underutilised land for housing development due to its benefits in achieving regeneration and reducing pressure for use of greenfield sites, with this including sites allocated for other uses where they are under-used or underperforming. However, the policy also cautions against utilising sites genuinely required for recreation, amenity or nature conservation purposes.
- 4.21 Authorities are again encouraged to utilise sites within town centres and in other highly accessible locations for higher density housing development in para 4.2.23.
- 4.22 Infill and windfall sites are tackled in para. 4.2.24, with Authorities required to have clear policy criteria to assess them, their valuable contribution noted, and a direction that windfall sites within settlement boundaries should be supported where *“they accord with the national sustainable placemaking outcomes”*.
- 4.23 Affordable housing is tackled in para’s 4.2.26-4.2.33, requiring Authorities to identify a community wide need across different categories of sites and contributions, and to set appropriate thresholds & targets, including requirements for commuted sums if sites fall below set thresholds. It also emphasises the importance of viability, sets out a requirement for viability assessment to take place on an open book basis (as per para. 4.2.22).
- 4.24 Para. 4.4.1 highlights the importance of community facilities in contributing *“to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places”*, and that such facilities cover a broad range of uses provided by public, private, and third sectors.
- 4.25 LPA’s are directed (in para. 4.4.2) to develop a strategic and long-term approach to the provision of such facilities in their development plans, and that when considering applications concerning/for community facilities that *“should consider the needs of the communities and ensure that community facilities continue to address the requirements of residents in the area”*.
- 4.26 Section 4.5 sets out the requirements for Authorities to consider and plan for their communities needs for recreational spaces, both through policies for new spaces (including through delivery as part of development schemes) and by protecting existing spaces. This includes a requirement to consider broader sport, recreational and leisure facilities, as well as formal and informal open spaces.
- 4.27 Section 6.2 of PPW addresses the concept of Green Infrastructure (GI) which is the *“network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places”* at various different scales from landscape scale features such as wetlands, waterways, peatlands etc. to individual local features such as parks, fields, ponds, to individual trees and hedgerows etc. These features are of value to protecting, maintaining and enhancing biodiversity and ecosystem resilience by connecting different eco systems and improving their condition and extant. Thus, the protection and improvement of GI is an important way that the LPA’s can deliver their duties under 6 of The Environment Wales Act (2016). GI also is capable of

providing multiple benefits to matters such as flood management, air quality, leisure spaces, sense of place etc.

- 4.28** Para's 6.2.6 to 6.2.10 require that LPA's must produce Green Infrastructure Assessments to detail existing GI and ecological assets and networks, with these required as part of work to underpin development plans. With clear objectives and benefits from these assessments set out in para. 6.2.9. This should include work to identify measures to adapt to climate change and other pressures, and that avoid or reverse habitat fragmentation, improve connectivity, and achieve other benefits such as restoration and improvement of land, landscapes, and ecosystems.
- 4.29** Para's 6.2.11 to 6.2.14 then set out how GI should be addressed in development, with schemes required to account for it in site selection and design, integrate GI into development, and deliver multiple benefits.
- 4.30** All applications are required to be accompanied by a Green Infrastructure Statement (GIS) of a scale proportionate to the scale and nature of the development proposed per para. 6.2.12, and for minor development can be a short description and should not be an onerous requirement for the Applicant. This must describe how GI has been incorporated into the proposal, from smaller scale measures such as site landscape, SuDS feature, green roofs etc to larger scale measures such as woodland, habitat linkages, meadows etc. This must be built up from baseline data on the site and scheme such as *"habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links"*. The GIS and development proposal should also be informed by the GIA for the area, and the Building With Nature Standard is also mentioned as being of value.
- 4.31** Section 6.3 sets out policy concerning landscapes, noting that all landscapes are valued and that their special characteristics should be protected and enhanced whilst paying *"due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places"*.
- 4.32** Section 6.4 sets out the approach to ensuring that the planning system plays its part in reversing the decline in biodiversity and improving ecosystem resilience by protecting against losses and securing enhancements (6.4.1-6.4.41). A key concept within this is the delivery of biodiversity net gain (BnG) and ecosystem resilience, with the required steps meaning that biodiversity and ecosystem reliance must be addressed at the early stages of both development plan and development proposal preparation.
- 4.33** Para. 6.4.5 provides greater detail on this point and states that *"A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site"*. A stepwise approach to achieving this is then set out as figure 1X and its accompanying paragraphs, which provide detailed guidance on how a suitable approach can be achieved. Off-site measures are included in this stepwise approach as a last resort, though this must be of significant magnitude to fully compensate

for any loss and only after it is evident that other solutions or sites for development are not suitable.

- 4.34** Para. 6.4.11-6.4.16 sets out more detail on the approach to maintaining and enhancing biodiversity, with a step-wise approach set out requiring that losses are first avoided where possible, minimized where not, then mitigated, and as a last resort that compensation is provided. Enhancement should be secured primarily on site or immediately adjacent to it, over and above the level required to mitigate or create for negative impacts.
- 4.35** Para. 6.4.12 states that evidence of this work must be provided in the GIS. Where evidence of steps to achieve enhancement is not provided then significant weight must be given to its absence, and unless there are significant material considerations otherwise such a proposal should be refused.
- 4.36** 6.4.16 is a new paragraph that sets out expectations that all applications are accompanied by pre-application surveys, research, and data surveys to establish the baseline state of a site, and its contribution to *“resilient ecological networks through its diversity, extent, connectivity and condition and the provision of ecosystem services”*. Such work is vital to delivering a proportionate response to significance of any impact. It is notable that the para. also states for householder scale schemes that LPA’s are directed to outline their expectations regarding information required as part of householder applications, and that enhancement measures sought must be proportionate to the scale of the development.
- 4.37** This para. also states that pre-emptive clearance work must not take place, and where this takes place the biodiversity value of the site should be taken from its state prior to clearance, and in the absence of evidence to the contrary it will be assumed to be good.
- 4.38** Finally, the para. confirms that all schemes must deliver net benefit for biodiversity and ecosystem resilience, including where the value of a site is maintained.
- 4.39** Para’s 6.4.10-20 set out guidance on the differing levels of nature conservation designation, ranging from international down to local level non-statutory designations. The key principle is that the relative value of the designation must be assessed, and that the impact of a proposal must be fully considered to ensure that adverse impacts are avoided (unless in certain cases the scheme is of sufficient importance and there is no feasible alternative, with greater weight against development in the highest tiers of designation).
- 4.40** The role of non-statutory sites is also recognised in para’s 6.4.31-6.4.33 with such sites forming part of habitat networks, and delivering key value biodiversity. GIA will be a key consideration when assessing schemes that may impact upon such sites. Appropriate developments can be advanced on such sites provided that it clear that adverse impacts are avoided, or where such harm is unavoidable it is minimised through mitigation measures and offset delivered to ensure that there is overall no loss in value or area, and that net benefit for biodiversity is delivered.
- 4.41** Para’s 6.4.34-6.4.36 set out guidance on how matters related to protected species and their habitat must be dealt with.

- 4.42 Para. 6.4.37 states that trees, hedgerows, groups of trees and woodlands are of great importance for biodiversity, as well as providing other benefits to landscape, culture, heritage, sense of place, air quality, recreation, and local climate moderation as well as tackling climate change. Promotion by LPA's of new tree (individual, group, and woodland) and hedgerow planting as part of development is encouraged. Welsh native species are noted as being of particular benefit.
- 4.43 LPA's are directed (in para. 6.4.39) to protect trees, hedgerows, groups of trees and woodlands where they *"have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function"*.
- 4.44 Para. 6.4.40 states that where *"trees, woodland and hedgerows are present, their retention, protection and integration should be identified within planning applications."*, with this being key where they are capable of making a significant contribution to the area. This includes planning of services & utilities to sites. Where trees are lost a set replacement ratio is set out later in PPW.
- 4.45 Para. 6.4.41 also notes that rural trees are also of value, with positive mechanisms to allow retention of rural trees expected to be delivered.
- 4.46 Para. 6.4.42 states that where removals are required then this must achieve significant and clearly defined public benefits, and that the step wise approach set out in para. 6.42 must be taken first. Where loss is unavoidable compensatory planting of a proportionate value must be delivered at a suitable ratio, but as a minimum at 3 trees of a similar type and compensatory size for every 1 lost. Where a woodland or shelter belt is to be removed then any replacement must also be suitable, and at a minimum *"of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers"*.
- 4.47 Para. 6.4.44 sets the expectation that planting of trees and hedgerows is delivered through suitable locally specific policies and strategies, conditions as part of consents, and/or by making of TPOs. This should also form part of GIA and plans.
- 4.48 Following the introduction of national mandatory SuDS standards and the SAB process SuDS requirements are flagged up in para's 6.6.17-6.6.19 as a key issue in any new development, and especially for those exceeding the relevant threshold.
- 4.49 Para's 6.6.20-6.6.21 express the requirement to utilise sewers in areas served by them, and where they are not present that suitable detail is provided on alternative systems.

Technical Advices Notes (TANs)

Technical Advice Note (TAN) 2 - Planning and Affordable Housing - 2006

- 4.50 This guidance document is relevant as it expands upon the approach to affordable housing set out in chapter 9 of PPW and provides greater detail on the approach to securing and providing affordable housing, including assessing the viability of schemes. There is also the aspect of 'need' and whether or not the affordable provision already approved is sufficient.

TAN 5 - Nature Conservation & Planning - 2009

- 4.51 Again, this TAN is relevant due to the potential for the site to host protected or priority species and/or habitats.

TAN 12 - Design - 2016

- 4.52 TAN12 is relevant as the proposal involves the construction of new buildings on the site and so its guidance on good design applies to the scheme.

TAN 15 - Development and Flood Risk - 2004

- 4.53 This TAN is only marginally relevant as it contains some guidance on matters relating to drainage.

TAN 16 - Sport Recreation and Open Space (2009)

- 4.54 This TAN is relevant due to the guidance that it sets out on providing open space in new developments.

TAN 18 - Transport - 2007

- 4.55 TAN18 is directly relevant to this application as it sets out the direction for transportation strategies that planning authorities should adopt at a policy level. In particular, the sections on maximum parking standards and the need to consider accessibility of sites set out in para's 4.6-4.7 are relevant.

TAN 20 - Planning and the Welsh Language - 2017

- 4.56 This TAN is relevant to the proposal as it exceeds the threshold in the relevant policy of the LDP where a Community & Linguistic Statement (or Welsh Language Statement as per the LDP) is required.

LOCAL PLANNING POLICY

Joint Anglesey & Gwynedd Local Development Plan (JLDP) - (2017)

- 4.57 The ***JLDP*** is the key material planning consideration for the proposal and sets out a variety of policies which are of relevance to the proposal, which include:-

- 4.58 ***Policy PS1: Welsh Language and Culture*** - Sets out thresholds beyond which development will trigger the requirement for a Welsh Language Statement, or in the case of more substantial developments a Welsh Language Impact Assessment.

- 4.59 ***Policy PS2 & ISA 1 - Infrastructure and Developer Contributions & Infrastructure Provision*** - Set out requirements that developments must provide or be served by sufficient infrastructure, and that where such infrastructure does not exist or has inadequate capacity then this must be provided either as part of the development or through financial contributions towards new infrastructure in the locality.

- 4.60 ISA 2 Community Facilities** - This policy sets out requirements for the development of new community facilities (defined in the supporting para's to the policy as "*facilities used by local communities for health, leisure, social and educational purposes and include schools, libraries, leisure centres health care provision, theatres, village halls, cemeteries, places of worship, public houses, and any other facility that fulfils a role of serving the community*"), as well as policy on resisting the loss of such facilities unless key criteria are met.
- 4.61 Policy ISA 5 - Provision of Open Spaces in New Housing Developments** - This policy is of relevance only due to the fact that this scheme exceeds the 10 or more unit threshold where there is a requirement to provide open space, or exceptionally provide off-site space or contribute towards new or improved facilities in the locality.
- 4.62 Policy PS4: Sustainable Transport, Development and Accessibility** - This policy sets out the high-level principles for matters relating to transport and accessibility within the plan area and summarises key material issues that are of relevance for this broad material consideration.
- 4.63 Policy TRA 1: Transport network developments** - is of some relevance to the scheme as it set out a requirement for schemes over a certain threshold or in sensitive areas that substantially increase journeys to provide a Transport Assessment. This will not be the case for this proposal as it is far below the thresholds set in the policy.
- 4.64 Policy TRA 2: Parking Standards** - Defines the LPA's parking standards for all modes of transport (by reference to a relevant SPG).
- 4.65 Policy TRA 4: Managing Transport Impacts** - This policy defines the transport and access hierarchy for proposals to be assessed by, and requires that development accounts for this hierarchy and does not cause unacceptable harm.
- 4.66 Policy PS 5: Sustainable Development** - This policy confirms that development will be supported where it is demonstrated that it is consistent with the principles of sustainable development.
- 4.67 Policy PS 6: Alleviating and Adapting to The Effects of Climate Change** - This policy is the companion to PS 5 and requires that development includes specific aspects which will assist in alleviating the effects of climate change.
- 4.68 Policy PCYFF 1: Development Boundaries** - This policy defines the plans policy in respect of the approach to development within or outside development boundaries, stating that:- for development within them that this will be allowed subject to compliance with specific policy relevant to the nature of development proposed; or, for development outside boundaries that it will only be allowed where it complies with specific policy within the JLDP or national policy, or where a countryside location is proved to be essential.

- 4.69 **Policy PCYFF 2: Development Criteria** - This policy sets out the key criteria which apply to development proposals across the plan area, detailing things which development should provide and also areas where if unacceptable impacts are identified a development will be refused.
- 4.70 **Policy PCYFF 3: Design and Place Shaping** - This is the overarching design policy for the plan and sets out all the key issues which relate to good quality design and development.
- 4.71 **Policy PCYFF 4: Design and Landscaping** - This is the overarching design and landscaping policy for the plan and sets out the key issues relating to landscape which relate to good quality design and development.
- 4.72 **Policy PCYFF 6: Water Conservation** - This policy defines requirements for efficient usage and best practice of the management of water consumption and drainage of a proposal. Again, it set out a requirement that a Water Conservation Statement be provided for major development schemes.
- 4.73 **Policy TAI 1: Housing in Sub-Regional Centre & Urban Service Centres** - this policy sets out the housing strategy for the proposed site's location, stating that housing development will be delivered through a mix of allocated and windfall sites, and setting out an indicative maximum provision of windfall sites within the settlement.
- 4.74 **TAI 8: Appropriate Housing Mix** - This policy seeks to intervene in the mix of housing units delivered on sites in order to "*improve the balance of housing and meets the identified needs of the whole community*". This includes both affordable and special needs housing, and also has links to density and housing design policies.
- 4.75 **Policy TAI 15: Affordable Housing Threshold & Distribution** - This policy set out thresholds for residential development beyond which affordable housing conditions will be sought at expected percentages of the dwellings on site.
- 4.76 **Strategic Policy PS 19: Conserving and where Appropriate Enhancing the Natural Environment** - Sets out high level policy to conserve and where appropriate enhance the natural environment, countryside and coastline of the plan area, and not to allow developments that have significant adverse effects except where the benefits of a development clearly outweigh the harms. The policy also sets out key points which must be given consideration when assessing applications, including impacts upon habitats & species, geology, and landscapes, designated sites, biodiversity, green & blue infrastructure, trees hedgerows & woodlands.
- 4.77 **AMG 3: Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character** - Guidance is given in this policy that requires consideration of features and qualities that are distinct to local landscapes, and which requires that where proposals would have a significant adverse impact upon landscape character (as per LCA's) that this has been considered in designing the development and selecting the site.

- 4.78 Policy AMG 5: Local Biodiversity Conservation** - This policy ensures that biodiversity is identified and protected in all proposals, and that mitigation and/or enhancement is provided as part of new development.

Supplementary Planning Guidance

- 4.79** The LPA has also adopted a number of guidance documents which expand upon policy within the LDP and provide greater detail and guidance on the LPA's approach to the key considerations that they cover. However, presently some of these documents relate to the previous development plan, and as such the weight that can be placed upon them is reduced. The following SPG's are of relevance for this proposal:-

- Affordable Housing (2019);
- Housing Mix (2018);
- Open spaces in Residential Development (2019);
- Planning Obligations (2019);
- Maintaining and Creating Distinctive and Sustainable Communities (2019);
- Parking Standards (2008);
- Change of use of community facilities and services, employment sites and retail units (2021);
- Design in the Urban and Rural Built Environment (2008) (Gwynedd only).

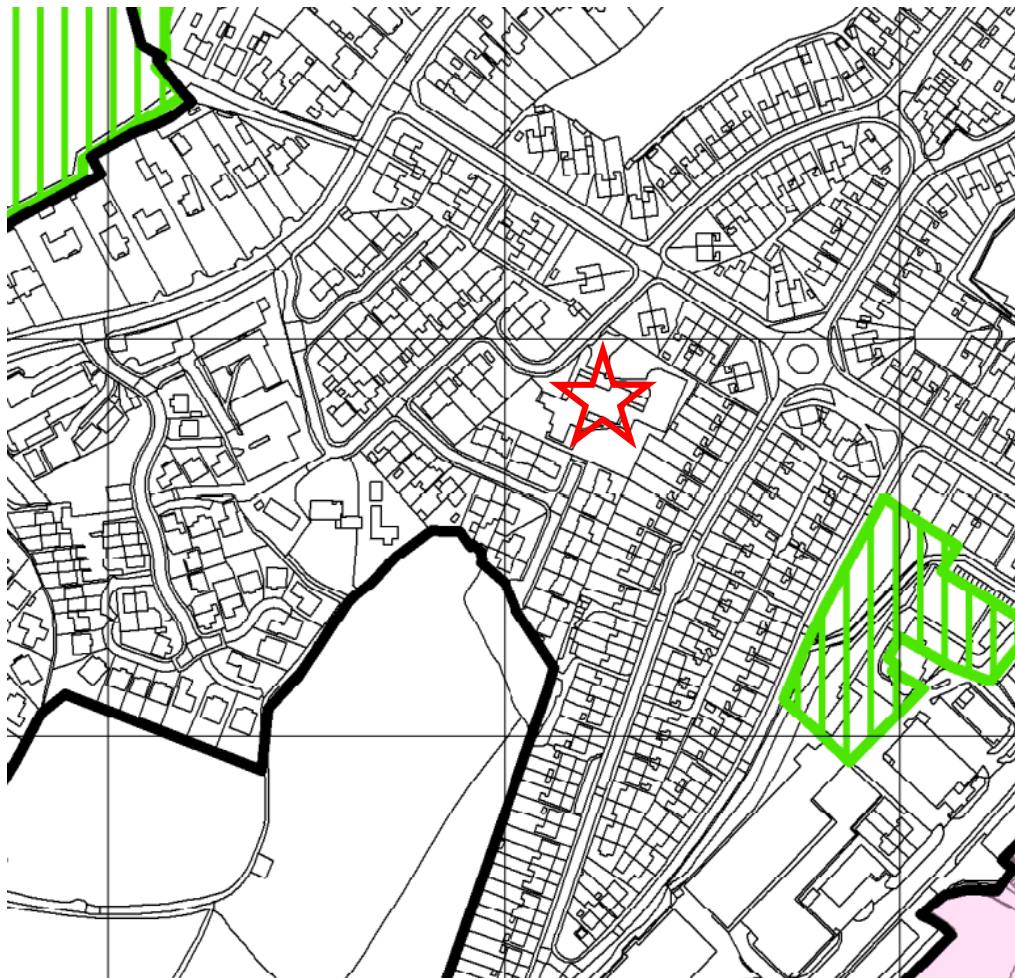
5.0 PLANNING CONSIDERATIONS

- 5.1 This section will examine the key material considerations of the scheme and assess the development against them in order to demonstrate that it is an acceptable scheme.

Principle

- 5.2 The proposal would utilise a site that is composed of previously developed land (containing areas of hard surfacing and the remnants of a demolished building - together with areas of grassland, trees, and other vegetation) and which is set entirely within the development boundary of the sub-regional centre of Bangor, to accommodate a suitable development for the site and locality (in terms of both the nature and the scale of the development proposed). The site is also accessible via non-car modes of transport and is well placed in terms of ease of access to the wide range of services, facilities, and employers within the town and the wider region. As such, it is clear that it will make a suitable use of this site.

Image 1 - Extract from JLDP Inset Map for Bangor, with the site marked with a red star



- 5.3 This is of particular relevance as the delivery of reasonable levels of windfall development forms an important element of the housing delivery strategy for the area with such sites providing a significant contribution to the total expected land supply. Importantly, the site is also set within the highest category of settlement within the plan - the sub-regional centre. Issues of housing supply and mix are dealt with later in this statement.
- 5.4 As such, it is considered that the scheme complies with the policy set out in *chapters 3 & 4 of PPW, and policies PS/5, PCYFF1, PCYFF2, PCYFF 3, PCYFF 4, & TAI1 of the JLDP* as the proposal is for a suitable type of development that reflects the settlement strategy and strategic approach to the housing land supply set out within the JLDP.
- 5.5 It is noted that no concerns were raised in respect of the principle of the scheme in the previous application. If there were such issues then they would have been highlighted in that case, and as nothing has changed it is expected that the proposal will continue to be acceptable.

Housing Mix & Level of Development

- 5.6 Policy TAI 8 looks at Housing Mix and requires a justification of mix sought in most cases. In this instance the proposal seeks consent for only intermediate affordable dwellings, which are being developed by Gwynedd Council through their Ty Gwynedd arm in order to meet an identified gap in this form of provision within the plan area. This approach has been adopted by the Authority as they have identified a gap in provision of affordable homes, with properties being provided at present comprising mainly social rented units (provided by housing associations) or a smaller amount of discounted/intermediate affordable housing provided by developers. This has left a gap for those requiring a shared ownership arrangement that the Applicant is well placed to fill. If approved, the houses would be made available on a shared ownership basis, with qualifying occupiers able to purchase the majority of the value of the dwelling (setting their mortgage at a substantial discount from open market value and thus ensuring that it is affordable), with the remaining value held by the Authority. This would ensure their long-term affordability for the occupiers, and the retained equity for Authority would guarantee that they provide a resource for the community for decades to come.
- 5.7 As stated above, the mix as presented would meet a particular affordable housing need identified for the settlement, with a mix of dwelling types and sizes provided to accommodate that need.
- 5.8 The following mix is proposed:-

Table 1 - Proposed Housing Mix

Unit type	No.	%	Type of dwelling	Total Bedroom no.	Tenure
4-person 2 bed house (4P2B)	4	40%	Semi-detached two-storey house	8	Shared equity intermediate affordable
5-person 3 bed house (5P3B)	6	60%	Terraced two-storey house	18	Shared equity intermediate affordable
Total no. dwellings	10		Total bed spaces	28	

- 5.9 The submitted Housing Mix Assessment provides a detailed assessment of the proposed mix, current supply, likely demand (inclusive of detail of need recorded in relevant data sources), and then assesses the proposed mix against that information and the County level expectations of the Local Housing Market Assessment. That report should be read in full for a proper understanding of this matter.
- 5.10 However, it is concluded that the proposed development would meet an identified local need for affordable homes for purchase, and the type of units proposed address the key aspects of that need. The scheme is also suited to its setting in terms of the type and nature of housing proposed. Critically, the scheme responds to registered affordable housing needs, and would provide a very under-represented tenure type in the city and county, and so will make a valuable contribution to addressing demand for affordable dwellings in the community.
- 5.11 As such, it is considered that the proposal responds well to the site and local needs, and indeed has been explicitly designed around them, and would provide a valuable opportunity to deliver a mixed tenure affordable housing led development on a highly accessible site in a key settlement, and so meet the need for affordable dwellings in the area.
- 5.12 As such, the development complies with the approach set out in *PPW, and JLDP policy TA18 as well as the current SPG on housing mix* as it will clearly meet local needs.
- 5.13 Turning to the question of *the growth level identified for the settlement*, policy TA11 identifies a set growth level for Bangor, comprising allocated site and indicate level of windfall growth. It is understood from correspondence received from the Joint Planning Policy Unit that supply in the settlement has exceeded the level allowed for in the plan.
- 5.14 As such, if allowed, the proposal will further exceed the indicative growth level of Bangor.

5.15 However, it is submitted that this further modest exceedance is justified owing to the following factors:-

1. The Housing Mix Report includes details of available housing need data (i.e. social housing register and Tai Teg) which shows a considerable demand for social rented, intermediate affordable rent, shared equity affordable housing, and intermediate affordable housing for sale. This acknowledged need considerably exceeds the available supply of both allocated and consented sites, and this proposal would go some way toward meeting that due to the intended shared equity intermediate affordable housing approach. On its own this unmet need provides a pressing basis to deliver more housing in the settlement, and the use of this previously developed site represents the most sequentially preferable option for delivering that need over greenfield or exception sites.

5.16 As such, it is submitted that there is a sound and reasoned basis for approving this scheme and further exceeding the indicative growth level set in the plan. Indeed, there would appear to be a basis for releasing other land in and around the settlement to meet the registered affordable housing need, but this falls outside the scope of this submission and document.

5.17 **Scheme density** is 27.5 dwellings per hectare (10 dwellings on a 0.4ha site) which falls slightly below the minimum target density of 30 dwellings per hectare sought in the plan (at PCYFF2). However, it is considered that the proposed scheme is acceptable as it clearly makes best use of the site whilst accounting for site constraints (such as trees) and policy requirements (such as open space and SuDS features) and respecting the amenities of the occupiers of neighbouring properties and the character of the area. As such the proposal complies with **policies PCYFF2 & TAI8 of the JLDP**.

5.18 It is noted that no concerns were raised in respect of the mix, housing, or density of the scheme in the previous application. If there were such issues then they would have been highlighted in that case, and as nothing substantive has changed it is expected that the proposal will continue to be acceptable in this respect.

Affordable Housing

5.19 As set out in the preceding section, the required level of affordable housing within the JLDP is 20% (so 2 dwellings) with the balance of the scheme (8) normally being provided as open market housing. However, in this case the entirety of the scheme is to provide as affordable housing as intermediate affordable dwelling for purchase.

5.20 It has been shown in the housing mix report that there is a clear need for affordable housing in the settlement and in particular for intermediate affordable dwellings for purchase and that the need considerably exceeds the number of houses proposed on the site. It is also clear that the level of need for affordable housing almost certainly exceeds that which will be delivered by other consented sites. As such, there is a clear demand and need for the dwellings proposed, and it is entirely reasonable to assume that they will be taken up by those on the housing need register.

- 5.21 The proposed mix and tenure of the scheme will be subject to an affordable housing restriction, and this will be discussed and agreed with the LPA during the application.
- 5.22 As such, the development complies with the approach set out *in section 4.2 of PPW, and in particular para's 4.2.26-33, TAN2, and JLDP policy TAI15 as well as the current SPG on affordable housing* as it will meet and will considerably exceed the required target for affordable housing percentages on sites within Bangor.

Design & Context

- 5.23 When assessing design, the initial process seeks out the context of the site and surroundings. The site lies in a residential area of the town, though there are commercial uses nearby that are mainly concentrated on Caernarfon Road.
- 5.24 Full detail of the design approach adopted for the scheme are provided in the *Design & Access Statement* provided as part of the submission and thus will not be repeated in full here.
- 5.25 However, it is clear from that the scheme represents a considered approach to the site and its context. The proposal adopts a traditional scale, form, and general design approach, but is of its time in terms of the design philosophy and materials¹. The result is a successful design for the proposed properties that will be suited to the site and context and will be of a high quality.
- 5.26 This approach also extends to the street design, with a 'standard estate road' providing the core access route within the site, but with parking deliberately placed mainly to the side of the dwellings to reduce the influence of cars on the street-scene and retain green space to the front of the properties. This arrangement will result in a higher quality streetscape than can be achieved with a 'standard developer' approach which usually dictates large areas of parallel parking spaces along the street edge. Thus, the proposal represents best practice in terms of design quality and sustainability as it reflects the role of those streets as part of a residential development, with pedestrians and cyclists given priority over cars.
- 5.27 Whilst the layout is different to that previously approved, proposing a single fairly straight access road with houses either side, rather than an inverted T-layout to the road with houses set around it, this layout is considered to be appropriate and would sit well amongst the housing set around the site and reflect the general street pattern of the area.
- 5.28 Open space for recreation has also been included within the proposal, and existing trees retained where possible and complemented with new landscaping, ensuring that it provides a pleasant environment for occupiers and also is subject to passive surveillance to give a safe and enjoyable space.

¹ At this stage final detail of materials has not been confirmed. However, sufficient detail is provided to allow consideration of the application, and it is submitted that condition requiring submission and approval of final details of external finishes prior to development proceeding beyond slab would be appropriate as it would allow control of this matter whilst also allowing preparatory works to commence on the development.

- 5.29 A detailed **soft landscaping design** has also been provided as part of this submission, with the proposed scheme designed to ensure that the site is landscaped to a high standard and thereby integrates successfully into its setting. The scheme also offers ecology benefits and has been integrated into the surface water drainage design.
- 5.30 Overall, what is being proposed is a high-quality scheme of a good standard of design that reflects the pattern of adjoining development and would provide a well-designed space that will be pleasant and enjoyable for its occupiers. As such, the proposal complies with the guidance on design set out within **Chapter 3, section 4.2 of PPW, TAN12, and policies and policies PCYFF2, PCYFF3, & PCYFF4, PS19, & AMG3 of the JLDP and SPG - Design in the Urban and Rural Environment.**
- 5.31 As detail of proposed finishes as well as landscaping have been provided on the submitted plans it is considered that there should be no further requirements for conditioned approval of those aspects, and instead that the submitted detail should be conditioned to be followed. Model conditions no's 84 and 69 respectively of Welsh Government Circular 016/2014 - Use of Planning Conditions for Development Management (WGC 016/2014).

Residential amenity & privacy

- 5.32 The submitted design would respect the amenities enjoyed by the occupiers of neighbouring properties as the proposal is set at a suitable distance from them and would be of an appropriate height and form to ensure that it would not have an overbearing impact upon the neighbouring dwellings. In particular, care has been taken to ensure an adequate level of separation from the facing side elevation of no. 39-29 Ffordd Coed Mawr, and the rear elevations of 1-7 Lon y Bedw and the side elevation of no. 9 Lon y Bedw, which are set closest to the proposed properties.
- 5.33 Activity on the site would be fairly limited and low-key due to nature of the use and would not be harmful to neighbours due to the level of separation involved and the existing urbanised character of the area. In addition, the previous use of the site would have generated a higher level of activity and thus the proposal will have a lesser impact. Similarly, movement of vehicles associated with the site would have a limited and entirely acceptable impact upon neighbours due to the relatively modest number of movements involved, the previous use of the site, current levels of vehicle movements in the area, and the acceptable degree of separation between the access and neighbouring properties.
- 5.34 A suitable level of amenity space will be provided for each of the proposed dwellings, with sufficient space provided around them to meet their occupants' needs. Similarly, a suitable level of separation would be provided between the proposed dwellings to ensure that their occupiers enjoy a good standard of privacy and amenity, and this again has been designed to comply with the relevant LPA guidance.
- 5.35 As such the proposal will comply with **sections 3 & 4 of PPW, and policies and policies PCYFF2, PCYFF 3, & PCYFF 4 of the JLDP** as the proposal has been suitably positioned and designed to respect and protect the amenities

& privacy of the occupiers of neighbouring properties and to provide a good standard to its own occupiers.

- 5.36 Again, it is noted that no concerns were raised on this point for the previous scheme, and as such it is expected that will remain the case for this proposal.

Ecology

- 5.37 An Ecological survey has been completed by Cambrian Ecology, with the resulting report provided as part of the submission. This was undertaken prior to demolition of the school building, but also provides conclusions and advice for the then forthcoming development. The report has been submitted with the application and should be read in full, but in brief it confirms that:-

- **Records search** - There are no protected or designated habitats within or close to the site. There are also no records of protected or notable species on the site;
- **Bats** - The site itself provides some potentially suitable bat habitat in the form of the buildings and trees. However, surveys have revealed that they are not in use and provide low potential after a detailed inspection and an emergence survey, and therefore the site has limited value due to its nature and setting. As such mitigation measures are proposed in the form of ceasing works if bats are found during demolition (none were found). Turning to enhancement, measures were proposed in earlier ecology reports for inclusion as part of the originally approved development, but the subsequent work supersedes this and does not recommend their inclusion, but recommendations for planting to offer connectivity and foraging are set out and these have been respected in the landscape plan. Where possible these are incorporated onto the plans, with the remainder suitable for imposition through conditions upon any permission;
- **Birds** - The site has some potential to host nesting birds and provides some foraging value. As such, the report recommends that the planting scheme is designed to provide native species that are of value to birds, with these either carried through onto the relevant plans. Similarly, enhancement measures are set out in the GIS, including house sparrow colony boxes, and swift bricks, all of which are shown on the proposed plans. Timing controls for removal of vegetation/trees are also set out;
- **Other protected & non-protected species** - No other protected or priority species were found to be present, and the GIS report recommends including 20 bee bricks within the development, which can easily be accommodated in the development;
- **Habitat** - The site comprises a mix of habitats comprising mainly amenity grassland, ornamental planting, some trees (within and adjoining the site), and the then present building and its hardstandings that dominated the site. The habitat assemblage is not rare or notable, and as such the report concludes that suitable mitigation and enhancement can be provided through a detailed landscaping scheme, with its recommendations carried through into the submitted design;
- **Invasive Non-Native Species** - Montbretia and Rockspurry cotoneaster are present on the site, which are both INNS, though their numbers are very limited. The report sets out two options for

eradication of the INNS, which are entirely suitable for control through conditions upon any permission;

- **Green Infrastructure** - The submitted GIS confirms that the site does not provide important habitat or connections, and those that exist will be retained and impacts avoided. Whilst these would be some habitat loss this is of lower value habitat and mitigation will be provided through the landscaping scheme and replanting proposed as part of the scheme. It is also confirmed that compensation & enhancement will be provided through bird boxes & other similar measures, tree & other planting, and other similar measures. As such, it is clear that the scheme will deliver biodiversity & ecosystem resilience and net benefit.

5.38 Overall, the measures set out in the report will protect the favourable conservation status of the species present on the site, and will address the requirement for ecological enhancement & mitigation. These are suitable for approval as part of any permission, and should be secured through a suitably worded condition/s upon any permission. As such the proposal complies with the guidance within *para's 6.4.1-36 of PPW & TAN 5, and with the requirement of policies PCYFF2, PCYFF 3, & AMG 5 of the JLDP.*

5.39 Again, it is noted that no concerns were raised in respect of the ecology & biodiversity matters in the previous application. If there were such issues then they would have been highlighted in that case, and as nothing substantive has changed it is expected that the proposal will continue to be acceptable in this respect.

Trees

5.40 In respect of trees, as the site is within influencing distance of 9 individual trees and 5 groups a detailed arboricultural survey was commissioned from Rob Taylor Arboriculture, with the resulting reports and plans included as part of this application. That report should be read in full but in brief it demonstrates that:-

1. Trees T1, T3, T4, & T5 and groups G2, G3, and G5 must be removed to allow development, but these are of low value and thus should not form a barrier to development;
2. Trees T2, T6, T7, T8, & T9 and groups G1 and G4 will be retained and safeguarded as part of the development. T2 in particular is a highly valuable tree which has been carefully incorporated within the scheme, requiring amendments from the initial concept;
3. The report and accompanying plans set out detailed measures to safeguard the retained trees during and following development. This scheme is detailed and is suitable for approval as part of this application and then imposition through conditions as part of any consent;
4. More than sufficient mitigation in the form of new planting is provided as part of the proposal to compensate for the removal of trees from the site.

- 5.41 As such the proposal complies with the guidance within *para's 6.4.37-44 of PPW& TAN10, and with the requirement of policies PCYFF4, PS19, & AMG/3 of the JLDP* as account has been taken of the trees within and around the site and suitable steps proposed to ensure that they will be retained and protected where they are of sufficient quality and value. Where removals are required these are justified and compensatory planting is proposed. Sufficient detail has been provided such that no further approvals are required, and the report and its requirements should be required to be followed under an adapted version of conditions 118 or 119 of WGC 016/2014.
- 5.42 It should also be noted that the impacts of the scheme in terms of tree removal and retention are the same as for the previous proposal, and so it is submitted that it should be equally acceptable as nothing substantive has changed from the previous case.

Drainage

- 5.43 A drainage scheme providing detail of surface water drainage arrangements has been prepared by YGC and has been included as part of the submission, this sets out the drainage approach for the scheme. This shows that:-
1. **Surface Water Drainage** - A proposed drainage approach is set out that addresses SuDS requirements. It has been concluded that the use only soakaways is not feasible in this case due to site conditions. As such, it is proposed that surface water will be managed within the site through swales, rain gardens, cellular storage, and a swale (plus the infrastructure and pipework leading into them) and then discharged at a controlled rate (allowing for climate change and a threshold storm event) to an existing DCWW surface water drain on the eastern boundary of the site. Use of other SuDS feature will also assist in reducing flows. This approach reflects the SuDS hierarchy and would ensure that this site is suitably drained. It is anticipated that a SAB pre-app advice will be sought concurrently with this application, allowing for any required adjustments to be made as part of this application. An application for SAB consent would then follow on from any planning approval.
- 5.44 In respect of **foul drainage**, the plans shows that a connection will be made to the foul drain within the site which then connects to a DCWW public sewer.
- 5.45 As such, the proposal will comply with *sections 6.6.17-6.6.21 of PPW and policies DP/3, NTE/8 and NTE/9 of the JLDP*.

Access & Accessibility

- 5.46 In respect of **vehicular access**, the scheme will be served by an improved access onto Bron-y-De. The proposed entrance provides a good standard of visibility onto the highway, with clear splays available in both directions that are sufficient bearing in mind the expected speeds and volumes on the highway, and also the historic use of the site as a school.
- 5.47 The proposed entrance will also provide a suitable **pedestrian access** from the site onto the existing footway that adjoins the site, with a crossing put in across that entrance to ensure that there is clear and safe access across it.

This arrangement will provide a good standard of access onto the wider pedestrian network within the settlement.

- 5.48 Turning to the question of parking, the proposed provision is suitable bearing in mind the size of the dwellings and the accessibility of the site.
- 5.49 Indeed, it is also considered to be pertinent to briefly touch upon the Council's SPG on parking.
- 5.50 The proposal includes the following number of parking spaces:-

Table 4 - Proposed parking

Type of space	Proposed number
On-plot parking	22 (2 per property, except for plots 5 and 6 which will have 3 spaces)
Visitor spaces	2
Cycle & motorcycle	<i>Space within plot of each dwelling to store at least one bicycle, likely more. No requirement for motorcycle spaces.</i>
Total	24

- 5.51 As the application relates only to residential development the scheme has been assessed against the residential zone 2-6 in the SPG standard as this is the most appropriate fit for this location (which is likely to be zone 3 or 4). Based on the size of dwellings indicated in the proposed plans (6 no. 3-bed, 4 no. 2-bed houses) the following level of parking is normally required *as a maximum*:-

Table 5 - Parking sought by SPG LDP02

Type of space	Level sought
Residents	26 (1 per bedroom)
Visitor	2 (1 per 5 units)
Cycle & motorcycle	<i>No requirement for cycle 'spaces', no requirement for motorcycle spaces</i>
Total	28

- 5.52 However, it is considered that the sustainability scoring set out Appendix 6 applies, with the following scores achieved:-

Table 6 - Sustainability points

Type of space	Level sought
Local facilities, (community centre, 205m, school 350m) 2 points	2
Public transport - stop within 300m	3
Frequency of public transport (within 800m)	2
Total	7

- 5.53 Which results in the following parking requirement:-

Table 7 - Parking sought by SPG LDP02 based on above points

<u>Type of space</u>	<u>Level sought</u>
Residents (reduction in 1 space per unit, subject to minimum of 1 space per unit)	16
Visitor (1 space reduction)	1
<i>Cycle & motorcycle</i>	<i>No requirement</i>
Total	17

- 5.54 The following table compares the proposed numbers of spaces against the standard sought by LDP02:-

Table 8 - Comparison between proposed parking and level sought by LDP02

<u>Type of space</u>	<u>Proposed number</u>	<u>Level sought</u>	<u>Difference</u>
Residents	22	16	+6
Visitor	2	1	+1
<i>Cycle & motorcycle</i>	<i>0 specified, sufficient space for at least 1 per dwelling</i>	0	<i>n/a</i>
Total	24	17	+7

- 5.55 The preceding table clearly shows that the proposal actually exceeds the required provision under the SPG's requirements, with the 4 no. of 3-bed properties meeting requirements, 2 no. of the 3-bed properties and the 2-bed exceeding them by one space (a prudent step), with an extra visitor space also provided (also considered to be prudent). Bearing in mind the accessibility of the site it is submitted that there should be no barrier to the approval of the application on the basis of the proposed level of parking.
- 5.56 In addition, it must be noted that car ownership levels can be expected to lower in this scheme as it proposes entirely affordable homes. In addition, to provide more parking would fly in the face of national and Local Policy which seeks to foster use of non-car modes of transport in locations such as this (as per. Para's 4.1.49-54 of PPW and TRA/2 of the JLDP). Indeed, the proposal all day-to-day facilities and many employers can be reached within an acceptable cycle distance or on foot. This coupled with the availability of public transport means that car use should be lower in any case, and all steps should be taken to encourage this through lower on-site parking provision.
- 5.57 As such, it is submitted that the development will have a minimal and entirely acceptable impact upon the operation and safety of the highway, which has sufficient capacity to accommodate the development, and that suitable access & parking arrangements are proposed for vehicles. It is also clear that the site can be provided with a suitable pedestrian access and is highly accessible via non-car modes.

- 5.58 As such, the proposal will comply with the requirements of **section 4.1 of PPW & TAN18 as well as policies PS4, TRA1, TRA2, TRA4, PS5, & PCYFF4 of the JLDP and together with SPG - Parking Standards**, as suitable access and parking arrangements are proposed.
- 5.59 It is noted that the Authority was satisfied with the access arrangement or parking provision for the scheme in the previous application. As nothing substantive has changed it is expected that the proposal will continue to be acceptable in this respect.
- 5.60 Any **construction impact** from the proposal will be modest and limited in duration, and there is more than sufficient space within the site to ensure that construction activity of fully self-contained. Therefore, no further detail should be required in this respect. However, in the event that the LPA disagrees on this point and can provide justification of any such stance then a Construction Method Statement could be provided as part of the application, or required through a pre-commencement condition to address construction impacts and management of traffic. In the case of the latter model condition no. 35 of WGC 016/2014 would be suitable.
- 5.61 Similarly, **construction operating hours** would be appropriate in this case and it is submitted model condition 65 of the same circular should be used and that 08:00-18:00 Monday to Friday, and 09:00-17:00 on Saturdays would be appropriate hours for this site.
- 5.62 In respect of access by persons with **disabilities or mobility impairments** the scheme has been laid out to provide suitable clear access routes within the site to allow for movement within it by all potential users. Turning to the dwellings themselves, the floor plans demonstrate that the buildings will be reasonably accessible subject to minor adaptations to allow use by particular users, such as the installation of a stair lift or full lift, either of which would be achievable within the proposed designs. As such, it is submitted that it is clear that these proposed dwellings will all be reasonably accessible and adaptable as per the approach set out in **para's 3.5-3.6 & 3.7-3.8 of PPW and TAN12, and in JLDP policies TRA4, PS5, PCYFF3, PCYFF4.**

Sustainability

- 5.63 In respect of **access via non-car modes of transport** the proposal is situated within walking and cycling distance of the wide range of shops, services, facilities, and employment sites available within Bangor. A good number of very regular bus services are also available within easy walking distance of the site allowing easy access to a wide variety of key local settlements, with a mainline railway station also set within a short walk or cycle allowing access to the wider region and nation.
- 5.64 As such, the proposal is set in a highly accessible location and therefore has the potential to foster the adoption of non-car modes of transport by its occupiers.
- 5.65 The proposal therefore complies with the objectives set out in **para's 3.6, 3.12-3.13, and section 4.1 of PPW, and in policies PS/4, TRA1, TRA4, PS5, PCYFF3 of the JLDP.**

- 5.66 Turning to the question of **energy use and built sustainability** the proposed dwellings will be designed to reduce their energy consumption through high levels of insulation, and the specification of energy efficient technology and fittings, as well as appliances and fittings that would reduce the use of water. As such, the environmental impacts of the proposal will be minimised as will the on-going running costs for its occupiers. This will address the requirements of **para's 3.7-3.8 & section 5.8 of PPW, TAN12, and policies PS5, PS6, PCYFF3, & PCYFF5 of the JLDP.**
- 5.67 A **Water Conservation Strategy** has been provided as part of the scheme which demonstrates that suitable measures can be incorporated into any future detailed design to reduce water usage. As such, the proposal complies with the requirements of **section 6.6 of PPW and policy PCYFF6 (as well as PS5, & PS6) of the JLDP.**
- 5.68 Again, it is noted that the previous application was entirely acceptable in respect of matters of sustainability, and as nothing substantive has changed it is expected that the proposal will continue to be acceptable in this respect.

Welsh Language

- 5.69 A Community and Linguistic Statement has been provided² to assess the possible impact of the development on the Welsh Language in the community. The statement should be read separately to allow a full assessment of the proposal but in brief it concludes that the scheme will have a modest impact and is unlikely to result in any harm due to its suitable scale in terms of the resident local population and the clear targeting of the development at identified local need for affordable housing.
- 5.70 Indeed, it is submitted that the project is likely to be beneficial as it would provide dwellings suited for use by a wide range of local residents, with the targeted tenure meeting an under-served need and allowing local people to establish long term homes in their community. This will ensure that the development provides a long-term asset for the community in meeting affordable housing need. This would assist in addressing the issue with housing affordability in this community, and thus will be an important component in retaining Welsh users in this community and in particular the young who are of course vital to the future of the language and the most likely to require assistance in accessing housing.
- 5.71 A set of mitigation measures are proposed in that document, and those would provide a proportionate and sufficient response to mitigate the modest risks/impacts identified and ensure that the scheme results only in positive impacts for the Welsh Language and its use in this community. Those measures could be controlled by way of a condition upon any permission requiring that the measures set out in the CLS are followed.
- 5.72 As per the requirements of policy PS1 of the JLDP the Applicant is also happy to agree to a condition requiring the use of bilingual signage and the retention and use of Welsh names within the development.

² Per the previous scheme this is required as the scheme exceeded the indicative growth level for the settlement, and thus triggered the relevant criterion of policy PS1, but a more detailed CLIA was not needed in this case.

- 5.73 As such the proposal complies with *para's 3.25-29 of PPW and TAN20, and the requirements of policy PS1 (& PS5) of the JLDP and SPG - Maintaining and Creating Distinctive and Sustainable Communities* as it is clear that the potential impacts of the development have been assessed and that the scheme will not result in any material harm to character and linguistic balance of the local community, and in addition mitigation would assist in addressing the residual impacts and ensuring a positive impact.

Open space

- 5.74 As the proposal is for more than 9 dwellings policy ISA 5 seeks provision of open space as part of the development “*where existing open space cannot meet the needs of the proposed housing development*”. This point was discussed in the previous case and following discussions with the LPA it was confirmed by the Joint Planning Policy Unit that there was an oversupply of outdoor sports space (a 6.17ha over supply of general outdoor sport, and an excess of 9.35ha of playing pitches) and an oversupply of children’s play space (5.26ha), but that there was a shortfall of equipped children’s play space (-0.34ha).
- 5.75 There has of course been further development since that time. However, this would not be sufficient to erode such a large oversupply.
- 5.76 Therefore, as it is clear that there is still a considerable over-supply of outdoor sport space and equipped play space for Bangor, this then leaves only equipped children’s playspace to be provided on site.
- 5.77 The following tables provide calculations of required open space on-site as part of this development:-

Table 9 - Required equipped children’s play space

A. Number of Bedrooms	B. Occupancy Assumption	C. Need per Unit (m ²)		CH. Number of Units	Total Need (m ²) (C x CH)
		B X	2.5		
1	1.31	3.28		0	0
2	1.72	4.3		4	17.2
3	2.35	5.88		6	35.28
4	2.82	7.05		0	0
5 or more	3.18	7.95		0	0
Total	-	-		10	52.48
				Less oversupply	0
				Net total	52.48

m2

m2

- 5.78 The required space has been integrated into the scheme, with additional space provided which will assist in meeting the current undersupply.
- 5.79 As a result the proposal will comply with the requirements of *section 4.5 of PPW and policy ISA 5 of the JLDP & the SPG Open Spaces in New Residential Developments*.

- 5.80 Again, this aspect of the proposal was accepted by the LPA when considering the previous submission, and overall provision is the same, so this should continue to be acceptable.

Planning contributions

- 5.81 At this stage it would appear that the scheme would not be liable to make any contribution. The only likely category would be toward education, and we understand that this will not be required as there is adequate space within local schools to serve the proposal.
- 5.82 As such the proposal has responded to the requirements of *policies PS2 & ISA 1 of the JLDP as well as the SPG on Planning Obligations* as no contributions are needed in this case.

'Loss' of community facility

- 5.83 Whilst the school that occupied the site was a community facility, it was no longer required as primary provision was reorganised within Bangor with Ysgol y Garnedd established and Ysgol y Faenol modernised and improved to replace the provision on this site and on other sites within the town. As a result, it is clear that a suitable replacement facility has been provided and that the existing provision was surplus to requirements as per criterion i. and ii. of part 2 of policy ISA 2.
- 5.84 In addition, the Authority has already allowed the demolition of the existing school via the prior notification route, and approved consent for redevelopment of the site for housing, thus accepting that the demolition of the building was appropriate and moving this aspect outside of this application.
- 5.85 As such, the proposal entirely complies with the requirements of *para's 4.1.1-2 of PPW as well as policy ISA2 of the JLDP and the accompanying SPG* as the 'loss' of the community facility provided by the school is acceptable. Indeed, this was confirmed by the LPA as part of the response to the PPE.

CONCLUSION

- 5.86 Overall, the proposal would develop a vacant previously developed site set within the built form of Bangor to accommodate a suitable, attractive, and affordable housing development that would be suited to its setting and the wider locality in terms of its scale, form, and design. The scheme would provide a mixed housing development that will meet identified local needs for affordable housing, and thus will make a valuable contribution toward meeting identified levels of housing need in the locality. It would also make the best use of the site in terms of its density, balancing the requirement to achieve higher densities in accessible locations against the constraints of the site, open space requirements, and the need to respect the locality. Finally, it would have an acceptable impact upon residential and general amenities, the operation and safety of the highway, biodiversity, and all other acknowledged interests.

6.0 CONCLUSIONS

6.1 The following conclusions can be drawn from the sections above:-

- ☑ The proposal would utilise a vacant previously developed site set within the existing built form of Bangor to accommodate a suitable development for the site and locality;
- ☑ The proposed mix would meet identified local housing needs, and is targeted at a large unmet need for intermediate affordable housing. Similarly, the level of development is appropriate bearing in mind that need for affordable dwellings in Bangor. As such, a further exceedance of the indicative growth level for Bangor is justified. The density of the scheme is also acceptable;
- ☑ The submitted plans show that it would result in an attractive development that would respond well to its context and the character of development in the locality;
- ☑ The scheme would ensure that the amenity & privacy of neighbouring residents is not materially harmed, and would provide a good standard of both for its own occupiers;
- ☑ The ecological report submitted with the application demonstrates that the development of the site is acceptable, subject to a suitable set of mitigation & enhancement measures being put in place. Those measures are achievable and could be secured by way of a condition upon any permission;
- ☑ Similarly, only a small number of lower value trees would be lost to accommodate the proposal, with only modest impacts upon the higher value retained trees as per the Arboricultural Assessment. Those impacts are acceptable subject to suitable protection measures and sensitive construction techniques being employed. The proposed measures are achievable and could be secured by way of a condition upon any permission;
- ☑ The site can be satisfactorily drained, with suitable foul and surface water drainage arrangements proposed as part of the scheme;
- ☑ A suitable access will be provided and the highway serving the site has adequate capacity to cater for the proposal. Pedestrian access has also been addressed with good arrangements proposed. Similarly, suitable off-road turning and parking space has been proposed, with the indicative level of parking meeting policy requirements and reflecting the accessibility of the site. The site is highly accessible via non-car modes of transport and as such is well placed to foster its adoption by its occupiers;
- ☑ The proposal is also highly sustainable from a built environment perspective, with a sustainable design & construction approach for the proposed dwellings being at the heart of the design;

- ☑ The Community & Linguistic Statement submitted with the application demonstrates that the scheme would not result in negative impacts upon the linguistic and social character of the locality, and indeed that it would be likely to be beneficial through the provision of much needed affordable homes. Residual impacts can be addressed through the proposed mitigation measures, which are reasonable, proportionate, and deliverable;
 - ☑ A suitable level of open space has been integrated into the scheme that will meet the needs arising from the development, and make a suitable contribution toward meeting the shortfall in provision in the area;
 - ☑ In this case a contribution toward school places is not expected to be required;
 - ☑ It must also be noted that this site was recently granted consent for the redevelopment with the same number of dwellings, and the only changes here are modest one to layout. As the previous proposal was acceptable, relevant planning policy is unchanged, and there has been no material change in circumstances since the last approval it is expected that this proposal will continue to be acceptable and should be approved.
- 6.2** To conclude, the proposal would make use of an area of a vacant previously developed site set within the heart of Bangor to accommodate an intermediate affordable housing development. Whilst the proposal would contribute to the exceedance of the indicative growth level for Bangor within the JLDP it will be modest and importantly will meet a clear need for affordable dwellings, and so is justified.
- 6.3** The submitted plans show that the scheme has been designed to a high standard and that it would form a suitable and attractive addition to the locality that would reflect the general pattern and form of development in the area, and which would sit well amongst the surrounding properties. The density of the scheme strikes a suitable balance between making the best of use of this highly accessible site whilst taking account of its constraints and the need for open space, and also ensuring that the proposal would not materially harm the privacy and amenities of neighbouring residents.
- 6.4** The site is highly accessible via non-car modes and a suitable access has been proposed together with off-road parking and turning space that would meet the proposal's needs, and a good standard of pedestrian access has also been proposed.
- 6.5** Detailed technical documents have also been supplied in respect of ecology & biodiversity, trees, community & linguistic impacts, and drainage, which should all be read in full but which demonstrate that the proposal is entirely acceptable in all these regards.
- 6.6** The previous consent also provides a fallback position for the Applicant, and as that decision was quite recent it is expected that this application should prove to be equally acceptable as there has been no change in circumstances or policy since that decision was made.

- 6.7 As a result, the proposal is fully supported by all relevant national and local policy. Therefore, there should be no barrier to approval of this application, and it is respectfully requested that permission be granted.

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