

Response to the formal Planning Application: 20/2022/0426, Land adjacent to Paradwys, Graigfechan, June 2022

Llanfair DC Community Council (LCC) originally submitted its response to the pre-planning consultation on the above proposal in April / May 2021. Since then, the developer has prepared a revised scheme and has submitted this for full planning approval to Denbighshire County Council (DCC). The revised scheme was developed by The Building Plot (TBP) on a plan reference 19.045.A004 dated 14/04/2022 and is included in Appendix A to this document. TBP submitted its pre-application consultation report as part of its application and drawings showing various details of the proposal as well as the design and access statement.

The revised plan would provide 21 homes: 5 no. 4 bed roomed with integral garage, 5 no. 3 bed roomed detached, 9 no. 3 bed roomed semi-detached, and 2 no. 2 bed roomed semi-detached. All properties would be two storeys.

LCC's response to the full planning application and considering how the full application design addresses the points made by LCC in the response to the pre-planning application in April / May 2021 the following points apply:

1. The original design did not provide the mix of housing identified by Jane Abbott, DCC's Housing Strategy and Development Officer. This identified a housing need through analysis for "*smaller two bed roomed housing would be needed in this area*". Ms Abbott further advised that the impact of the development of the housing "*would benefit from being phased in order to explore and develop a local market for the properties.*"
 - LCC has concern that the revised April 2022 design, although providing smaller houses only provides two of 2 bedrooms, effectively starter homes. Welsh Government revised instruction (Policy BSC4) states that developments should comprise 30% affordable housing. The provision falls short of both the 10% requirement and the new guidance.
 - The developer has not indicated whether it would take a phased approach to determine the market need and should provide a statement of whether it would adopt this proposed approach and provide flexibility to ensure that the need is met.The mix of housing is an improvement from the April 2021 design. The design does not include bungalows as previously identified by the housing needs survey.
2. LCC would wish to see more detail about the approach the developer proposed for the site. This would include matters set out previously including:
 - How the proposal supports the Well-being goals of the Well-being of Future Generations (Wales) Act 2015,
 - The approach to Section 106 or Commuted Sums,
 - The outcome of consultation with the Clwydian and Dee Valley AONB relating to the proposal particularly in relation to the impact of the design on the setting and the lighting proposals.
3. LCC recognises that the design addresses some of the concerns about the original proposal and how the development would fit into the existing village in terms of local distinctiveness.

However, the density of housing remains a concern and the proposed layout is much more compact than the adjacent Bryn Glas development which is the most recent similar addition to the village, and which provides an example of more spacious and what LCC would consider appropriate development. Indeed, at the time when planning permission for the adjacent Paradwys was sought the proposer was instructed that only a single storey development would be permitted at this location. The layout of the development should reflect the setting. LCC believes that the density of the proposed development as well as the lack of variety in the appearance of the houses is not in keeping with the existing village and would be detrimental to the visual amenity of the area, especially as it sits within the Clwydian Range and Dee Valley AONB. There is concern that the development would give rise to noise and light pollution in the village.

4. The developer should set out how the development values and enhances the environment. It would be helpful to understand how the proposal considers LCC's biodiversity action plan. The Design and Access statement states "*The development intends to protect and wherever possible enhances the local natural and historic environment.*" This is a vague and aspirational statement and specific measures should be set out to demonstrate how the "nett gain" from the development would be achieved.
5. The developer should explain the approach to energy provision and management for the proposed housing. Given that government policy is striving to move towards a nett-zero carbon economy there is little detail in the application to demonstrate how energy efficiency has been incorporated into the design. As a rural off-grid village, householders would be dependent on oil or LPG for heating. The application provides no detail on how energy efficiency would be achieved other than as a basic minimum by compliance with building regulation standards. There is no proposal for example to incorporate additional value and benefit such as by incorporation of solar heating, heat pumps or photo-voltaic cells.
6. The developer should set out how the proposed design addresses potential privacy issues in relation to adjacent properties. This would follow the Welsh Government's National Development Framework "Building Better Places: The Planning System Delivering Resilient and Brighter Futures, July 2020". Particularly, the developer should provide evidence of how it has considered overlooking issues to Paradwys as well as within the development.
7. LCC notes that the revised design results in 52 parking spaces (including garages) being provided. House types 1 and 2 would have 3 spaces (including the garage for type1) and types 3 and 4 have 2 spaces. LCC has a concern that parking provision still falls short of DCC guidance especially in provision for visitor parking. There is concern that parking could overspill onto the B5429 main road. The LPA may deem it necessary to introduce parking restriction on the main road to overcome any highway safety issues that could arise. Should the LPA determine that permission be granted LCC would strongly suggest that a condition be made that no vehicles associated with the construction should be parked on the B5429 at any time.
8. LCC believes that the development would give rise to long-term highways issues as well as traffic problems. The B5429 is a multi-use road with pedestrians, cyclists, horse riders as well as vehicles. The road provides a short-cut avoiding the Nant Y Garth pass and LCC has been working with Denbighshire Highways for ten years to identify solutions to address traffic

issues. LCC has worked with North Wales Police's Community Speedwatch (Go-Safe) and has purchased speed guns. Vehicles are frequently observed and reported travelling at excess speed, despite signage to alert drivers. Traffic problems have not been resolved by the measures already introduced. The entrance to the development would be on a length of road that experiences speeding. This is at its current 30mph limit which will shortly become even worse once a 20mph limit is established in accordance with Welsh Government policy for built up areas. The provision of footpath alongside the proposed development is noted but this will do nothing to provide safety for anyone travelling either side beyond the site. There would be increased risk of traffic accidents because of the development.

9. Graigfechan can only be accessed locally on to the A525 or the A494 along narrow single-track lanes. At present these roads require frequent passing manoeuvres when vehicles meet. The addition of more traffic either from residents from the proposed development or from people providing services to them will exacerbate the situation.
10. LCC notes that the revised design increases the area of open space from 946m² to 1199m². The proposed open space is on the fringes of the development and does not provide any useful space as had been requested. The area is linear, is frequently marsh and is dark due to the hedges alongside. Further, the two wider parts of the space adjacent to the site will effectively be sterilised from any use by having SUDs beneath them. The village already has a recognised lack of recreational space. LCC is disappointed that the developer has not included for any play area provision within the development. It is suggested that the developer should either make provision for recreational space within the design or should make provision for funding through the s106 agreement.
11. Graigfechan is an unserviced village with no shop, or school. The village has no bus service, and the mobile phone signal coverage is poor. Graigfechan has one public house which opens for a limited number of days each week. Graigfechan has no amenities, so any resident moving into the proposed development would have little choice but to be reliant on the use of a vehicle to travel along on the B5429 to access everyday services such as for health or education.
12. LCC has a concern that the scale of the development in the village setting could have a detrimental impact on the health and well-being of village residents due to anxiety and stress. Whilst addressing potential housing need, the benefit from the proposal would be outweighed by the negative impacts as currently presented. The development would give rise to noise, dust and air pollution as well as the environmental impact on the site and loss of habitat and amenity both during and after construction is complete.

For the reasons stated above LCC would request that the LPA in its consideration require the applicant to address the issues and to refuse permission based on the application.

LCC would advise that the Community Council is not bound by its comments and is free to raise additional and / or different comments during the planning application determination.

Eirwen Godden

Clerk to the Council and Responsible Financial Officer

Appendix A revised design plan – April 2022

