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Planning Statement

Loreto Convent, Wales and West Housing

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1. Introduction

Introduction

1.1. JLL has been instructed by Wales and West Housing Association to prepare this Planning Statement in support of an application seeking approval of full planning permission for the demolition and redevelopment of Loreto Convent to provide new affordable housing accommodation (Use Class C3) to be located at Loreto Convent, Abbey Road, Llandudno.

1.2. The description of development is as follows:

‘Proposed demolition and redevelopment for an affordable housing apartment block comprising 30no. apartments (Use Class C3) and 6no bungalows (Use Class C3), Loreto Convent, Abbey Road, Llandudno’

1.3. In addition to this Statement, the planning application is accompanied by the following supporting documents:

- Planning Application Form and Certificates (Prepared by JLL)
- Statutory Planning Application Fee
- Planning Drawings (Prepared by Matthew Jones Architects)
 - D-1420-PL00D-PRO. SITE PLAN
 - D-1420-PL01-PRO. GROUND FLOOR PLAN
 - D-1420-PL02-PRO. FIRST FLOOR PLAN
 - D-1420-PL03-PRO. SECOND FLOOR PLAN
 - D-1420-PL04-PRO. BUNGALOW FLOOR PLAN
 - D-1420-PL05-PRO. MATERIAL PALETTE
 - D-1420-PL06B-PRO. APARTMENT ELEVATIONS 01
 - D-1420-PL07B-PRO. APARTMENT ELEVATIONS 02
 - D-1420-PL08B-PRO. APARTMENT SECTIONS
 - D-1420-PL09-PRO. BUNGALOW ELEVATIONS 01
 - D-1420-PL10-PRO. BUNGALOW ELEVATIONS 02
 - D-1420-PL11-PRO.CONTEXTUAL STREET SCENE

- D-1420-PL12-PRO. SITE SECTIONS
- D-1420-PL13A-PRO. 3D VISUALS
- CGI Visuals (Prepared by CGI Inspired)
- Highways drawings (Prepared by Datrys)
 - 24261-DAT-XX-XX-DR-C-SK400P6 General Arrangement and Levels
 - 24261-DAT-XX-XX-DR-C-SK401-1P6 Highway Vertical Alignments Sheet 1
 - 24261-DAT-XX-XX-DR-C-SK401-2P6 Highway Vertical Alignments Sheet 2
 - 24261-DAT-XX-XX-DR-C-SK410-1P7 Swept Path Analysis Refuse Analysis
 - 24261-DAT-XX-XX-DR-C-SK410-2P6 Swept Path Analysis Fire Tender
- Drainage Scheme (Prepared by Datrys)
 - 24261-DAT-XX-XX-DR-C-SK501P6 Proposed Drainage Scheme
- Design and Access Statement (Prepared by Matthew Jones Architects)
- Extended Phase 1 Habitat Survey (including Preliminary Roost Assessment) (prepared by Richards, Moorehead and Laing)
- Flood Consequences Assessment (Prepared by Weetwood Services Ltd)
- Green Infrastructure Statement (Prepared by The Environment Partnership)
- Bat Bird Box and Hedgehog Report (Prepared by The Environment Partnership)
- Heritage Impact Assessment (Prepared by Phoenix Heritage)
- Transport Statement (Prepared by Focus Transport Planning)
- Arboricultural Impact Assessment (Prepared by Tree Solutions)
- Utility Study (Prepared by Utilities Connections Management Ltd)
- Welsh Language Statement (Prepared by Wales and West Housing Association)

Structure

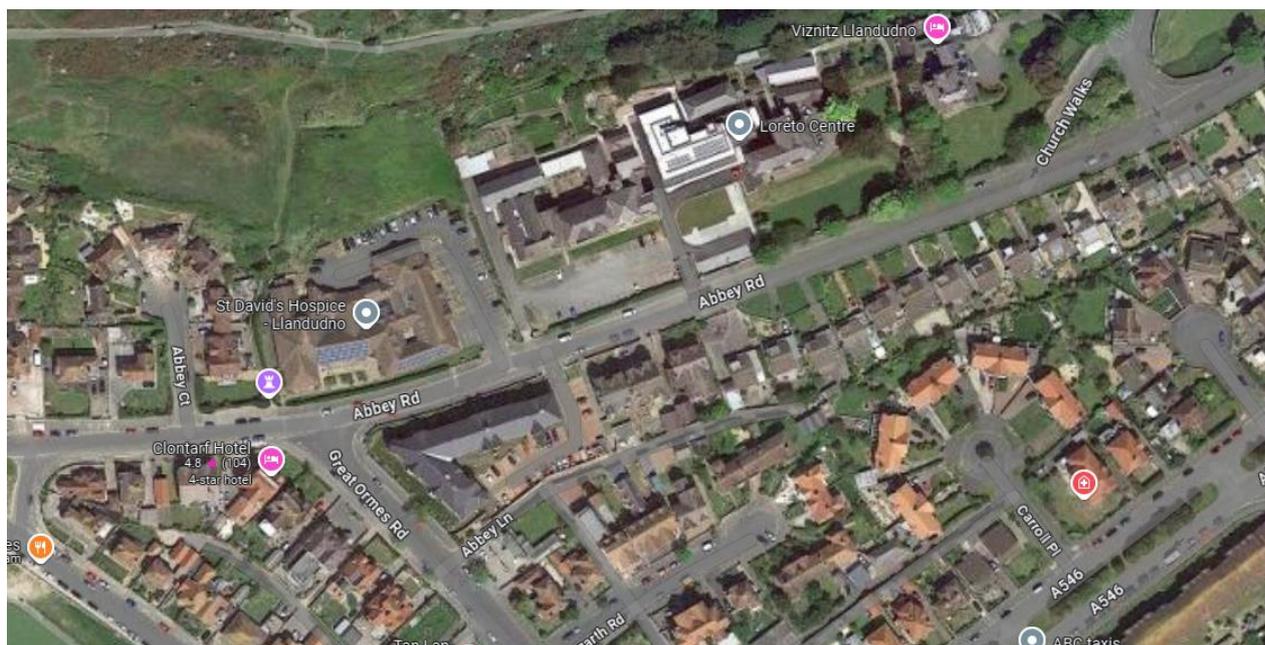
1.4. This Planning Statement identifies and addresses the issues relevant to the consideration of the application submission, as follows:

- Site Location and Description – describes the physical characteristics of the planning application site and its immediate surroundings;
- Planning History of the Site – identifies the relevant planning history for the site;
- Proposed Development – provides a description of the proposed development;
- Pre-Application Advice – summarises pre-application discussions undertaken between the applicant, its advisors and the Local Planning Authority;
- Planning Policy Context – describes the planning policies which are relevant to the proposed development;
- Open Space Assessment – Provides justification for the lack of provision of open space on the site
- Planning Considerations – Provides an assessment of the proposed development against the policies, guidelines and other material planning considerations ; and
- Conclusions - sets out the conclusions of this statement.

2. Site Location and Description

The Site and Surrounding Area.

- 2.1. The application site is currently previously developed land at Loreto Convent. The site measures approximately 0.49ha (1.2 acres) and is located to the north of Abbey Road, Llandudno. The site sits at the base of The Great Orme which is an important geological and environmental feature of Llandudno and is designated as a Local Nature Reserve, Special Area of Conservation and Site of Special Scientific Interest
- 2.2. The existing buildings on the site comprise of two mansion houses with modern extensions which have been added on in ad hoc fashion over many years. The site also includes dedicated access and associated car parking. The most recent use of the existing houses is as a convent, comprising former residential accommodation for the Sisters of the Order and overnight stay for guests.
- 2.3. Vehicular and pedestrian access to the site is currently taken from Abbey Road.
- 2.4. The site also sits within the Llandudno Town Centre Conservation Area.
- 2.5. Immediately to the east of the site is new fit for purpose, modern residential accommodation which the Sisters have recently moved to. It also functions as a spiritual centre offering a space for retreats, courses, conferences and a quiet space for individuals.
- 2.6. To the west of the site is St. David's Hospice which is a local charity providing hospice care to adult patients across Conwy, Gwynedd and Anglesey. To the south of the site are residential properties of a Victorian Era construction with modern apartment blocks and dormer bungalows on either side.



Wider Area

- 2.7. The wider area is predominantly made up of residential dwellings which are a mix of houses and apartments. There are also a number of hotels within walking distance of the site.
- 2.8. Llandudno West Shore Beach lies approximately 0.6km south west of the site where there is a café, miniature railway and a play area.
- 2.9. The site is located 1.6km west of Llandudno town centre which consists of an active high street along Mostyn Street as well as Llandudno Retail Park which contains a mixture of retail options including The Range and Marks and Spencer. Llandudno Junction lies 6.1km north of the site and Conwy is 6.km north of the site.
- 2.10. The nearest railway station is Llandudno, situated approximately 1.6km south east of the site, providing services to Llandudno Junction which then provides direct travel to Holyhead, Chester, Wrexham, Shrewsbury, Newport and Cardiff.
- 2.11. The nearest bus stop is located 0.64km (10 minute walk) south of the site on Gloddaeth Avenue providing services to Bangor and Llysfaen.

3. Planning History

3.1. A planning history search has been undertaken via a desktop search of Conwy County Borough Council's public access.

3.2. Whilst no significant planning history has been identified at the application site itself, there are relevant planning permissions at the site adjacent. These applications are shown in the table below.

Reference	Description of Development	Decision and Date
0/41051	Demolition of St Josephs; St Anne's, the Annex and outbuildings and construction of a new residential care home facility, including community and administrative space, self-contained apartments and chapel (C2/C3/D1); refurbishment and extension of existing convent building to provide a retreat and conference facility (C2/D1); reconfiguration of existing and provision of a new vehicular access and circulation space; parking and associated landscaping.	Approved With Conditions 06-02-2015
0/41052	(Conservation Area Consent) Demolition of St Josephs; St Anne's, the Annex and outbuildings and construction of a new residential care home facility, including community and administrative space, self-contained apartments and chapel (C2/C3/D1); refurbishment and extension of existing convent building to provide a retreat and conference facility (C2/D1); reconfiguration of existing and provision of a new vehicular access and circulation space; parking and associated landscaping.	Approved with Conditions 02-12-2014

3.3. On 2nd November 2014 and 6th February 2015 permission was granted for Conservation Area Consent and Full planning permission respectively, for the demolition of St Josephs; St Anne's, the Annex and outbuildings, and the construction of a new residential care home facility along with self-contained apartments, an extension to the existing convent building, a conference facility and additional parking.

4. Proposed Development

Proposal

4.1. The proposed development is described on the application form as follows:

Proposed demolition and redevelopment for affordable housing apartment block comprising 30no. apartments (Use Class C3) and 6no bungalows (use class C3), Loreto Convent, Abbey Road, Llandudno'

4.2. The proposal will be delivered by Wales and West Housing Association, an established registered provider of affordable homes in 13 local authorities across Wales.

4.3. The proposal has two elements:

- Part 1: 100% affordable homes, Use Class C3, to provide a total of 30no. apartments for social rent.
- Part 2: 6 bungalows, Use Class C3.

4.4. The apartment block will be split over three floors, providing a mix of one and two bed flats. The block will include 28 x one-bedroom apartments and 2x two-bedroom apartments.

4.5. The bungalows will comprise 4 x one-bedroom bungalows and 2 x two-bedroom bungalows.

4.6. The proposed car parking comprises 22 parking spaces which are to be shared across the development.

Site Layout

4.7. A detailed site plan has been prepared, outlining the layout of the proposed development. The affordable housing apartment block is proposed to the north of the site, set back slightly from where the existing building currently sits. The principal entrance is located to the front elevation of the building while secondary entrances are located on the eastern and western elevations.

4.8. The layout of the social rented apartment block would be as follows:

Ground floor:

- 4 x one-bedroom apartments
- 2 x two-bedroom apartments

First floor:

- 12 x one-bedroom apartments

Second floor:

- 12 x one-bedroom apartments

- 4.9. The bungalows are proposed to the south of the site and sit at a lower level than the apartment block. The three bungalow buildings that will comprise of two apartments each all sit facing inwards to create a courtyard space with a shared communal garden. A communal drying area is situated to the north west corner of the community garden.
- 4.10. A total of 22 car parking spaces are proposed at the site which includes three disabled parking bay spaces. 13 of the car parking spaces (including 2 of the disabled parking spaces) are proposed to the front entrance of the apartment block. The third disabled parking bay is proposed to the west elevation of the apartment block. The remaining eight car parking spaces are proposed to the eastern perimeter of the bungalows.
- 4.11. Secure enclosed cycle parking has been provided within the ground floor of the main building which will accommodate 10 spaces for cycle users.
- 4.12. A communal bin store which can accommodate 13 bins to serve the residents of the apartment block is proposed to the eastern elevation of the building. An additional bin store with a capacity of six bins is proposed to the north east corner of the bungalows to service those residents .
- 4.13. Vehicular and pedestrian access to the site is taken from the existing access point from Abbey Road. Pedestrian crossings and dropped kerbs have been provided at key junctions across the scheme to ensure for safe movement throughout.

Housing Standards

- 4.14. The proposed scheme has been designed to meet and largely exceed the housing standards in Wales, incorporating guidelines from local and national planning policy, the Welsh Development Quality Requirements (WDQR), Manual for Streets, and Disability Discrimination Act Regulations (DDAR). This comprehensive approach ensures a well considered layout that prioritises accessibility, inclusivity and sustainability, setting a benchmark for future residential developments within Conwy.
- 4.15. The proposed development fully adheres to Appendix B of the WDQR with regard to minimum floor areas for affordable housing. 22 of the 28 one-bedroom apartments range between 56sqm and 60sqm therefore clearly exceed the minimum requirements of 53 sq m. The two, two-bedroom apartments have GIAs of 92sqm and 93sqm, thus exceeding the minimum requirements by roughly 40sqm. Six of the one-bedroom apartments have been designed to have a GIA of 52sqm. Though this is below the minimum requirement by 2%, they sit within the acceptable buffer of 5%, and the quality of the apartments proposed have not been compromised in line with the guidance in the WDQR.
- 4.16. The two, two-bedroom bungalows have been designed to have a floor space of 67sqm, clearly exceeding the minimum requirements of 58sqm. The two one-bed bungalows have been designed to have a GIA of 49sqm, though this is below the minimum requirement by 2%, they sit within the acceptable buffer of 5%, and the quality of the bungalows proposed have not been compromised in line with the guidance in the WDQR.

- 4.17. The proposed apartments and bungalows all meet the minimum floor space requirements set out in the WDQR for these home types, providing generous space standards to promote functionality and adaptability.
- 4.18. All of the residential units within the proposed apartment block and the proposed bungalows have been designed to meet the requirements of Lifetime Home standards, providing adaptability for residents or those who may develop mobility needs in the future.
- 4.19. The five entrances to the buildings are proposed to provide level access or gentle gradients compliant with Part M of the DDAR, ensuring ease of use for wheelchair users or those with mobility issues to access the ground floor and first floor of the apartment block. All six of the bungalows are also accessible for those with mobility issues or wheelchair users.
- 4.20. Internal circulation within the apartment is facilitated by staircases compliant with Part M of the DDAR, allowing access to all levels within the proposed apartment block.
- 4.21. Ground floor communal entrances and stairwells within the apartment block have been proposed to feature large windows and level threshold which visually and physically link the indoor and outdoor areas to enhance accessibility and encourage social interaction.
- 4.22. Overall, the proposal delivers high quality, accessible homes which meet and largely exceed the minimum space and standards for new homes, delivering lifetime homes for future tenants.

5. Pre-Application Advice

Introduction

- 5.1. A pre application advice request was submitted by JLL on behalf of Wales and West Housing Association in relation to a proposed affordable housing scheme on the site in on the 2nd February 2023 (ref: ENQ/31873). The pre application request was for the following description of development:
- 5.2. *'Proposed demolition and redevelopment to provide new affordable housing accommodation, (use class C3), Loreto Convent, Abbey Road, Llandudno.'*
- 5.3. The proposal included two affordable housing apartment blocks with associated access, car parking, landscaping and facilities. It was proposed that one of the apartment blocks would sit to the north of the site and one to the south, proving a mix of one and two-bedroom apartments.
- 5.4. The block to the north of the site comprised a two storey building with a total of 13 apartments made up of 8 x one bedroom apartments, 5 two-bedroom apartments, and car parking comprising 14 parking spaces.
- 5.5. The block to the south of the site comprised a three storey building with a total of 32 apartments made up of 26 x one bedroom apartment, 6 x two bedroom apartment and 31 car parking spaces.
- 5.6. No pre application meeting was held between the Council and the applicant, however, a formal pre application response was received on the 4th May 2023 which included responses and guidance from various technical consultants within Conwy Council.
- 5.7. The formal pre application enquiry response concluded that based on the information submitted, the Council Officers would unlikely support the proposal. One of the main concerns from a design point of view was that the proposed apartment buildings may have resulted in a prominent impact on the street scene dependent on its massing and scale.
- 5.8. Based on the feedback, the applicant, JLL and the wider project team further advanced the proposal and submitted a new pre application pack on 7th November 2023.
- 5.9. The updated scheme included a change to the description of development which is set out below:
- Proposed demolition and redevelopment to provide new affordable housing accommodation (use class C3) and a separate step down/respice accommodation (use class C3), Loreto Convent, Abbey Road, Llandudno.*
- 5.10. The scheme was revised so that the apartment block building would not sit to the front of the site on the Abbey Road boundary and instead, it was decided to include one whole apartment block set back further into the site on the higher level and create further accommodation to the front of the site in the form of bungalows .
- 5.11. The bungalows were proposed to be used as new homes or possibly respice or step-down care for patients of St Davids Hospice which lies adjacent to the site.

- 5.12. The affordable housing block was redesigned to be in keeping with the surrounding area and retain similar features and attributes to that of the existing Loreto Convent in terms of scale and massing.
- 5.13. The bungalows were proposed to the front of the site at a lower level. They were designed in a way that would be discreet in comparison to the larger apartment block building. The initial design included using green roofs and a neutral colour palette so as to blend into the scheme and the surrounding landscape.
- 5.14. At this stage of the pre application, CGIs were produced for both the apartment block and the self-contained apartments to show more design detail including the proposed colour palette and materials as well how the scheme would look in relation to the street scene along Abbey Road.
- 5.15. JLL, the applicant and the Council held a meeting on the 19th December 2023 to discuss the new scheme at the site. The Case Officer agreed with the principle of the scheme but required some further design detail.
- 5.16. Following comments and feedback from the November 2023 pre application, the project team spent time evolving the design which included changes to the material palette of both the main building and the proposed bungalows as a way to make them more distinct to the local area. Other updates to the scheme included:
- Adapting the window proportions to ensure they were more practical and allow more daylight into the space
 - Updating the street scene elevations
 - Changes made to the front entrance way of the main building.
 - Revised car parking spaces.
 - More detailed GA plans for the bungalows and main building.
- 5.17. The updated drawings were submitted to the Case Officer on 17th May 2024. The Case Officer confirmed that the principle of the scheme was still acceptable, but the design and detail were slightly lacking.
- 5.18. From this, a separate meeting was organised with the Design team to discuss the proposal updates which was held on 20th August 2024. Some of the main points that came from the meeting with the design team were focused on the main building and are set out below:
- Avoid the pastiche approach
 - Some fascia's added to the front elevation to give the design some more depth
 - Window proportions
 - Roof material of main building
- 5.19. The Council's Design team requested rendered images to show 3D viewpoints including the materials and the colour palette of the main building. Comments were also made about the windows not being uniform and slightly random.

5.20. Since the design meeting in August, the project design team has altered the scheme by taking on board the comments raised by the Council and has evolved to what is being presented in the proposed scheme and the 3D rendered images.

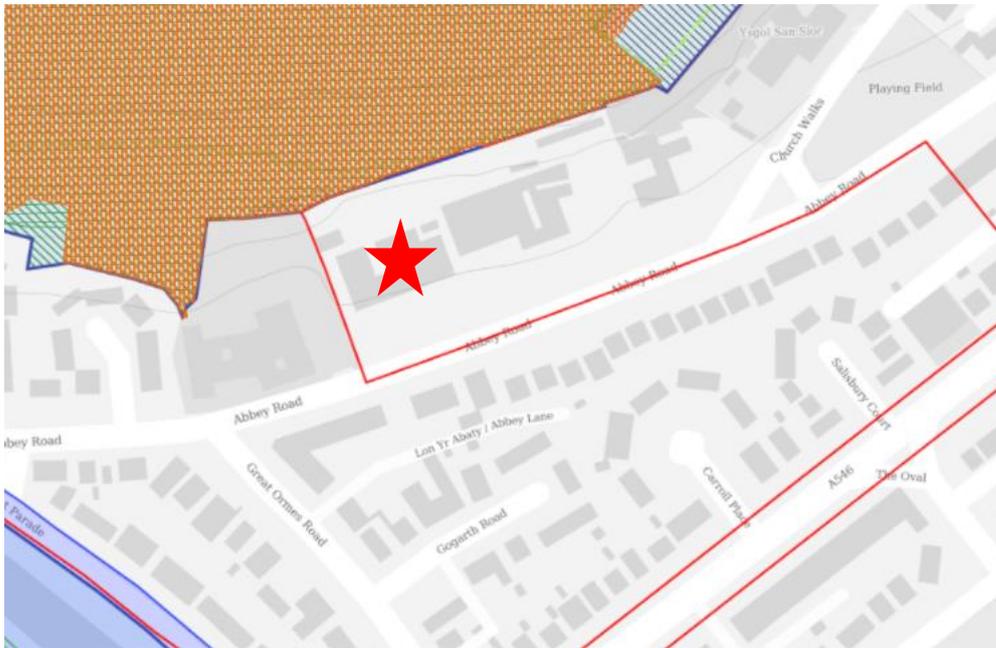
6. Planning Policy Context

Introduction

- 6.1. When determining a planning application, the relevant authority (in this case Conwy Borough Council) as the Local Planning Authority will be under statutory obligation, as imposed by Section 38(6) of the Planning and Compulsory Purchase Act 2004 to make their determination in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. The current Conwy Local Development Plan 2007-2022 was adopted in October 2013. The Plan is currently under review and is at Stage 5 (Preferred Strategy) in its progress. The last consultation on the Preferred Strategy was between 29th July 2019 and 20th September 2019 which has not since progressed further. Relevant policy will be taken from the current Local Plan and Planning Policy Wales (PPW) (Feb 2021).
- 6.3. The Planning Wales Act and Wellbeing of Future Generations (Wales) Act 2015 are also recognised as part of this proposal.

Local Planning Policy

- 6.4. As identified in the local plan policies map, the site lies within the Llandudno Settlement boundary and is not allocated within the Conwy Local Development Plan for any use type. However, the site does lie within, but on the edge of, the Llandudno Town Centre & Seafront Conservation Area.
- 6.5. The site also sits at the base of The Great Orme which means the site is within close proximity to a variety of environmental designations including a Site of Special Scientific Interest (SSSI) Special Landscape Area, Safeguarded Hard Rock Reserve, Local Nature Reserve as well as the Special Area of Conservation.



6.6. The below policies are considered to be relevant to the proposed development.

6.7. **Policy CTH/2 ‘Development Affecting Heritage Assets’** states that proposals which affect heritage assets, including Conservation Areas, and/or its settings should preserve or enhance that asset. There has been demolition and redevelopment on the neighbouring site which has been complimentary to the Conservation area. The principle of this type of development has therefore been accepted in the area and the proposed scheme will take a similar approach in its mass, scaling and design.

6.8. **Policy DP/1 ‘Sustainable Development Principles’** sets out that development be consistent with sustainable development principles. Key requirements include:

- Compliance with national guidance and the sequential approach to development.
- Efficient use of land and infrastructure, prioritizing previously developed sites in accessible locations.
- Conservation or enhancement of cultural heritage, biodiversity, and wildlife habitats.
- Addressing risks of flooding and various forms of pollution.
- Employing sustainable building techniques and incorporating energy and water conservation measures.

Where appropriate, developments should also:

- Provide safe access via public transport, bicycle, and foot, minimizing car dependency.
- Include traffic management and congestion reduction measures.
- Make provisions for necessary infrastructure and public services.
- Adhere to high design standards, ensuring attractiveness, adaptability, accessibility, and security.

- Promote sustainable economic development.
- Conserve or enhance valued open spaces and local landscapes.
- Address potential climate change impacts.
- Protect natural resources including water, air, and soil.
- Reduce waste production and manage recycling.

6.9. These requirements align with various Strategic Policies and Development Policies outlined in the Local Plan, ensuring a comprehensive approach to sustainable development.

6.10. **Policy DP/3 ‘Promoting Design Quality and Reducing Crime’** sets out that new development should be of high quality, sustainable design which provide usable, safe, durable and adaptable places while protecting the local character and distinctiveness of the historic and natural environment. The policy goes on to set out the ‘must have’ requirements for development as well as other requirements where appropriate.

6.11. **Policy DP/4 ‘Development Criteria’** states that development proposals should provide the following where appropriate:

- a) Affordable Housing for Local Need;*
- b) Safe access from the highway network and enhancement of public transport, cycling and pedestrian infrastructure;*
- c) Car parking;*
- d) Safe and secure cycle parking;*
- e) Open Space;*
- f) Safe and convenient access for all to public buildings and spaces, including those with limited mobility or those with other impairments such as of sight or hearing;*
- g) Screened storage of refuse, including recyclable materials;*
- h) A design and layout that minimises opportunities for crime;*
- i) Financial contributions towards the provision and maintenance of infrastructure, services and facilities required by the development*

The policy goes on to state that planning permission will not be granted where the development would have adverse impacts on:

- a) residential amenity;*
- b) From traffic generated;*
- c) On archaeological interests and the built form;*
- d) On the Welsh language;*
- e) On environmental conditions arising from noise, lighting, vibration, odour, noxious emissions or dust;*

- f) On ecological and wildlife interests and landscape character;*
- g) On flooding and flood risk;*
- h) On the best and most versatile agricultural land;*
- i) On quality of ground or surface water;*
- j) On essential community facilities*

- 6.12. **Policy DP/5 ‘Infrastructure and New Developments’** sets out that *‘All new development, where appropriate will be expected to make adequate contributions towards new infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from the development or future maintenance and upkeep of facilities. Contributions will be sought in line with the Council’s priorities.’*
- 6.13. **Policy DP/6 ‘National Planning Policy and Guidance’** states that *‘development proposals must comply with national planning policy and guidance’*
- 6.14. **Policy HOU/1 ‘Meeting Housing Need’** sets out that over the period of the Local Plan, the Council will aim to deliver approximately 6,520 new dwellings, 85% of which will be located primarily within and on the fringe of Urban Areas. The site lies within Llandudno which is listed as an Urban Development Strategy Area therefore residential development in this area is favoured to be able to reach the Council target for new dwellings.
- 6.15. **Policy HOU/2 ‘Affordable Housing for Local Need’** explains that the council will require the provision of affordable housing in new developments as identified in the Local Housing Market Assessment (LHMA) Housing developments in Llandudno would be expected to provide 35% of affordable housing on new residential schemes. The proposed development is for 100% affordable housing which exceeds the Councils target of 35% in the Llandudno area, therefore meets the requirements of Policy HOU/2.
- 6.16. **Policy HOU/4 ‘Housing Density’ sets out that:**
- 1. Residential developments should make the best use of land. The Council will seek a density of 30 dwellings per hectare on allocated sites and large windfall sites (10 dwellings and above).*
 - 2. Higher densities of up to 50 dwellings per hectare will be sought where it represents a sustainable use of land and buildings and does not result in an unacceptable impact. Higher density schemes which result in a negative residual value and lower affordable housing provision will be discouraged.*
 - 3. Lower densities below 30 dwellings per hectare may be acceptable in circumstances where natural and/or built environment and infrastructure constraints impact on site layout.*
- 6.17. **Policy HOU/5 ‘Housing Mix’** sets out that proposals should reflect the requirements for housing mix as set out in the LHMA unless otherwise demonstrated by evidence of the local circumstances of the area suggests a different housing mix which would better suit the local needs. The LHMA recommends more affordable housing is required now more than previously, concluding that 1,155 would be required between 2017-2022 (231 per annum). It also suggests that there is a need for smaller house types as single person households increase. In line with the need for small

house types, the proposal is aiming to deliver 36 affordable one and two bed apartments and six one and two bedroom bungalows.

6.18. **Policy HOU/6 ‘Exception Sites for Affordable Housing for Local Need’** states that *‘Housing schemes providing 100% AHLN may be permitted as an exception to normal policy circumstances in line with Strategic Policy HOU/1 and Policy HOU/2 and providing the following criteria are met:*

- a) *The general local need for affordable dwellings has been proven;*
- b) *There are no allocated sites coming forward within the development boundaries or confinements of the settlement which could meet this need;*
- c) *The proposal adjoins and forms a logical extension to the development boundary or adjoins the existing settlement;*
- d) *Secure arrangements are provided to restrict the occupation of an affordable house/houses on first occupation and in perpetuity to those who can prove general local need for an affordable house;*
- e) *The number, size, type and tenure of the dwellings meet the justified local need as set out in the local housing needs survey in line with Policy HOU/5;*
- f) *The AHLN units are of high quality, built to the Welsh Government’s Development Quality Requirements – Design Standards and Guidance 2005 in line with Policy HOU/2, Strategic Policy NTE/1 – ‘The Natural Environment’ and The Code for Sustainable Homes;*
- g) *The development proposal meets the requirements set out in the Development Principles and other related policies of the Plan*

Policy CFS/11 ‘Development and Open Space’ sets out that

‘1. New housing development of 30 or more dwellings shall make on site provision for the recreational needs of its residents, in line with the Council’s standards for open space of 3 hectares per 1000 population, comprising of:

- *1.2 hectares for playing pitches*
- *0.4 hectares for outdoor sport*
- *0.8 hectares for children’s playing space*
- *0.6 hectares for amenity open space 2.*

2. In exceptional and justified circumstances, consideration will be given to the provision of a commuted sum as an alternative to on-site provision, in accordance with Strategic Policy DP/1 – ‘Sustainable Development Principles’ and Policies DP/4 – ‘Development Criteria’ and DP/5 – ‘Infrastructure and New Developments’.

3. New housing development of less than 30 dwellings shall make provision of a commuted sum as an alternative to on-site provision, in line with the Council’s standard for open space of 3 hectares per 1,000 population’

6.19. **Policy NTE/3 ‘Biodiversity’** sets out that new development should aim to conserve and enhance biodiversity through various routes including; sensitive siting, layout and design, the management of wildlife habitats, integrating biodiversity into the built environment, achieving targets in the

Conway Local Biodiversity Action Plan and providing a management agreement with the LPA to secure the long term future of biodiversity interests. The policy goes onto state that all proposals should provide a Biodiversity Statement and that the Council will refuse proposals which would negatively impact on certain sites, species or habitats.

6.20. **Policy NTE/4 The Landscape and Protecting Special Landscape Area** states that Special Landscape Areas (SLAs) include the Great Orme and Creuddyn Peninsula. In order to conserve the attributes of the SLAs, proposals should show regard to the character of the locality in order to minimise their impact.

6.21. **Policy STR/1 'Sustainable Transport, Development and Accessibility** sets out that Development will be strategically located to minimise travel needs and promote sustainable transportation. The Council will:

- Focus development in highly accessible areas along the A55 and railway network, adhering to policies on parking standards, travel impact mitigation, and sustainable modes promotion.
- Safeguard land for integrated sustainable transport, improve public transit, and enhance interchanges between modes. Developments will contribute to these improvements as required.
- Promote walking and cycling throughout the Plan Area by improving infrastructure design and safety. Developments will contribute to these connections and provide quality cycle parking where appropriate.
- Support transport schemes that improve accessibility. Development proposals must address potential for sustainable transport options, including Travel Plans.

These actions aim to reduce private car dependency, improve service accessibility, and encourage sustainable travel behaviour.

Planning Policy for Wales

- 6.22. Chapter 2 People and Places paragraph 2.8 explains that proposals and decisions must seek to promote sustainable development and support the well being of people and communities across Wales.
- 6.23. Chapter 3 Strategic and Spatial Choices paragraph 3.5 sets out that development should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.
- 6.24. Chapter 4 Active and Social Places paragraph 4.2.1 sets out that planning authorities must understand all aspects of the housing market in their areas which will allow them to develop evidence based market and affordable housing policies in their development plans. New housing development in urban and rural areas should incorporate a mix of market and affordable house types, sizes and tenures to cater for local needs and create sustainable communities. As stated above the LHMA recommends more affordable housing which the proposed development intends to fulfil and will provide a mix of one and two bed units.
- 6.25. Chapter 4 paragraph 4.2.33 sets out that proposals for residential sites that comply with up-to-date development plan policies for the inclusion of an element of affordable housing should be

assumed to be viable. The proposal commits to 100% affordable housing and so meets the requirements of national policy.

- 6.26. Chapter 6 Conserving and Enhancing the Historic Environment, paragraph 6.1.6 explains that the Welsh Government seeks to preserve or enhance the character or appearance of conservation areas while helping them to remain vibrant and prosperous. As stated above there has been demolition and redevelopment on the neighbouring site which has been complimentary to the Conservation area. The principle of this type of development has therefore been accepted in the area and the proposed scheme will take a similar approach in its mass, scaling and design.
- 6.27. Chapter 6 Conservation Areas, paragraph 6.1.16 states that preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area. The proposal aims to ensure that a high quality proposal is presented which contributes to the preservation of the conservation area.
- 6.28. Paragraph 6.1.17 is clear that a conservation area designation introduces control over the total or substantial demolition of unlisted buildings within these areas, requiring conservation area consent and should take account of the wider effects of any proposed demolition. The proposal, i.e. replacement structure, will be designed with the conservation area status in mind and tested against the conservation area appraisal.

Planning Wales Act and Wellbeing of Future Generations Act

- 6.29. It should be noted that more recently, the Planning (Wales) Act requires a development to be sustainable, with this requirement being in accordance with the Wellbeing of Future Generations Act 2015, the main objective of which is to ensure *'that the land development contributes to the economic, social, environmental and cultural wellbeing of Wales.'*
- 6.30. The Wellbeing of Future Generations Act, defines 'Sustainable Development' as follows *'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals'*, it is considered that the proposed scheme adopts the principles of sustainable development.

7. Open Space Assessment

- 7.1. This Section provides an assessment of the Open Space available within Llandudno.
- 7.2. Policy CFS/11 Development and Open Space sets out that *'new housing development of 30 or more dwellings shall make on site provision for the recreational needs of its residents, in line with the Council's standards for open space of 3 hectares per 1000 population, comprising of:*
- *1.2 hectares for playing pitches*
 - *0.4 hectares for outdoor sport*
 - *0.8 hectares for children's playing space*
 - *0.6 hectares for amenity open space*
- 7.3. *In exceptional and justified circumstances, consideration will be given to the provision of a commuted sum as an alternative to on-site provision, in accordance with Strategic Policy DP/1 – 'Sustainable Development Principles' and Policies DP/4 – 'Development Criteria' and DP/5 – 'Infrastructure and New Developments'.*
- 7.4. Paragraph 4.510.1 states that, *'housing developments should, in the majority of cases, incorporate play and amenity spaces into a scheme or, where this is not feasible, make a financial contribution secured through a planning obligation made under Section 106 of the Town and Country Planning Act 1990. Financial contributions will be accepted for residential developments of less than 30 dwellings. For residential developments of 30 or more dwellings, the Council will seek the provision of on-site children's play facilities and a financial contribution to off-site outdoor sports space. Developments of 200 or more residential dwellings will normally be expected to provide all required outdoor sport and children's playing space on-site. Further details on provision of open space and commuted sums can be found within LDP4 – 'Planning Obligations' SPG'*
- 7.5. Further advice in respect of open space considerations is provided at Chapter 9 of LDP4: Planning Obligations Supplementary Planning Guidance. This sets out, *'measures required to meet the needs of the future occupants of the proposed development where the failure to provide the obligation would impose unacceptable impacts on the local community'* and that *"the Council will, where appropriate, seek planning obligations to provide or improve public open space and recreational facilities in association with new developments'*
- 7.6. The SPD goes on to describe various types open space and thresholds for their provision. Paragraph 9.7 is highly pertinent in connection with the proposed development of specialist forms of development where children in the 0-14 age range will not be resident. It sets out exceptions and confirms that *'a contribution towards the enhancement and development of play areas will not be sought from studio dwellings, one bed dwellings owned by a registered social landlord, sheltered and elderly housing and other specialist forms of development where children in the 0-14 age range will not be resident. One bed dwellings may be able to negotiate a reduced amount of contribution towards children's play; however, the 2011 Census does indicate that there are children living in one bedroom properties'*
- 7.7. The proposed development comprises mainly of 1 bedroom apartments within the main apartment block and 4 x 1 bedroom bungalows, therefore it is unlikely that children will be residing on the

site. Moreover, it was identified that there is a children's play area within 0.49km of the site as well as Llandudno West Shore Beach which lies approximately 0.6km

- 7.8. The Council has also recently approved an application for the *'Demolition of existing buildings and erection of a supported living affordable housing development (Use Class C3), access, parking, landscaping and communal courtyard, drainage infrastructure and associated development.'* (ref:0/48566)
- 7.9. As part of the application, the Council accepted the Landscape Plan submitted by Wales and West Housing and the justification for not providing the Open Space as required by local policy. It was agreed by Wales and West and the Council that the Landscape Plan provides sufficient open space for the proposed apartments due to the age group of the residents (over 55's) that will be occupying the dwellings.
- 7.10. The proposed Landscape Plan for the development at Loreto Convent provides a similar amount to the above approved scheme of open space for the future residents of the proposed apartments. The plan comprises:
- 9 new trees
 - A gravel garden in the courtyard area of the proposed bungalows
 - Ornamental Planting
 - Three areas of single species hedging
 - Large tiered garden which comprises of pockets of green space and existing trees with an existing walkway which is accessible via steps for residents who wish to use the space.
- 7.11. The submitted landscape plans set out a comprehensive landscape proposal indicating the hard and soft landscape elements of the scheme. The proposed development is similar to the approved application (ref: 0/48566) in the fact that children are not expected to be living in the apartment block or bungalows due to the majority of dwellings comprising of one bedroom only. It is therefore considered that the proposed landscape plan is sufficient to fulfil the needs of the residents who will be residing at the apartment block and the bungalows.

8. Planning Considerations

Introduction

- 8.1. When determining a planning application, the relevant authority (in this case Conwy Borough Council) as a Local Planning Authority will be under statutory obligation, as imposed by Section 38(6) of the Planning and Compulsory Purchase Act 2004 to make their determination in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

- 8.2. The site is not allocated within the Conwy Local Development Plan 2007-2022 for any use type. The surrounding area is primarily made up of residential properties under use class C2 and C3. It is considered the principle of the proposed use, residential use Class C3, is acceptable at the site. Moreover, following the most recent pre-application with Conwy Council in August 2024, it is considered that the principle for this use has been accepted.
- 8.3. In November 2023, the applicant submitted a further pre-application pack to Conwy Council following a review of the internal layout of the existing building. The internal layout does not lend itself to conversion for an affordable housing scheme. It would not meet modern housing standards and due to the complexity of works required for any conversion it would result in inefficient space on varying levels resulting in a financially unviable scheme. The site was also put on the open market, and no interest came forward to retain and convert the existing building. This is a reflection of the market and condition of the building.
- 8.4. It is important to note that the convent lies within but on the edge of the Llandudno Town Centre & Seafront Conservation Area. The new accommodation for the Sisters also sits within the Conservation Area and provides a complimentary design demonstrating that the principle of demolition and redevelopment is also considered acceptable subject to appropriate scale and design.
- 8.5. Whilst some impact has been identified in demolishing the existing building, the proposal to introduce a significant number of much needed affordable homes are important to contribute to the needs of Conwy community.
- 8.6. As set out in the Affordable Housing Provision: April 2023 March 2024¹ document, the Welsh Government has committed to delivering 20,000 new low carbon homes for rent within the social sector. Currently, a total of 8,933 units have been delivered since 2021, leaving approximately 11,000 units still to be delivered by 2026.
- 8.7. Within Conwy specifically, according to the Social Housing Register, Creuddyn has the highest percentage of overall demand for social housing in the Conwy area as of April 2024 (42.2%). Llandudno falls within the Creuddyn Local Housing Market Area and is the first area choice for one, two, three and four bedroom houses.
- 8.8. The proposed development will materially contribute to the goal of 20,000 new homes within the social rented sector across Wales, producing an energy efficient low carbon scheme. Locally, the

¹ <https://www.gov.wales/affordable-housing-provision-april-2023-march-2024-html>

development will assist in addressing the much-needed requirement for one and two bedroom accommodation in the Llandudno area.

- 8.9. The pre application response that was received in May 2023 understood that the proposed development would be 100% affordable housing which positively exceeds the policy requirement, therefore the development would be supported in principle. The Housing Strategy team was also supportive of the proposal 'as the application is 100% affordable housing and it meets the following strategic priority – general needs 1 bed accommodation.' The strong stance on the provision affordable housing for the proposal has not changed so it is expected that the proposal is still supported in principle.
- 8.10. The proposal also contributes to the key objectives of the PPW by delivering much needed new homes, and in particular affordable homes, whilst the provision of good quality, accessible, DDA compliant homes which will further contribute to the wellbeing objectives set out in the Wellbeing Act 2015.

Design

- 8.11. The design, appearance and functionality of the proposed development has been carefully considered by Matthew Jones Architects in consultation with Conwy Council and relevant national and local design led policy guidance.
- 8.12. The design rationale and specification are set out in detail in the accompanying Design and Access Statement submitted in support of this application.
- 8.13. The Statement confirms that the overall design of the development respects the surrounding street scene, with the scale and massing in keeping with adjacent buildings. The form of the proposed buildings is traditional, reflecting the historical architectural features of the area, but also incorporates modern design elements to provide contemporary and efficient living spaces for the residents.
- 8.14. The palate of materials has been chosen carefully to ensure the building is in keeping with the natural landscape and surroundings, set forward of the Great Orme whilst giving it an identity of its own. The muted multicolour facing brickwork and grey cladding is proposed as it helps the building blend into its surroundings from distant vantage points from the East and West.
- 8.15. Following formal pre-application with the Council, windows have been 'framed' externally with a protruding aluminium frame to emphasise the vertical proportions. Furthermore, the elevations are broken up with vertical cladded recesses between each gable end to break up the massing and emphasise the vertical proportion of the facades.
- 8.16. The bungalows are located on the lower level of the site and following formal preapplication with the Council are arranged in a 'U' shape to create an enclosed courtyard. The location of the bungalows provides an appropriate balance, with the taller apartment block on the raised part of the site.
- 8.17. The development has been designed to ensure accessibility for all, in line with Inclusive Design principles and DDA regulations.
- 8.18. The design of the buildings, both internally and externally, adheres to the requirements of Lifetime Homes standards and Secured by Design Gold standards, ensuring that the units meet the highest standards of quality, safety, and accessibility. The units are designed to maximise light whilst controlling solar gain, ventilation, and functional space, while ensuring adaptability for future

residents. All buildings are designed with accessibility in mind, and the external areas have been landscaped to provide communal spaces that foster a sense of community among residents.

8.19. Overall, it is considered that the proposed development is in accordance with both local and national planning policy.

Heritage

8.20. A Heritage Impact Assessment (HIA) has been prepared by Fenix Heritage in support of this planning application.

8.21. In considering the proposed development, Fenix Heritage noted that the existing building is made up of two original buildings that over time has experienced a range of changes including extensions and alterations. Sit within the Llandudno Conservation Area, the site sits along a section comprising a number of large residential buildings. The HIA sets out that the existing structure was last utilised for multiple occupancy. The proposed development aims to replace this building with a new purpose-built multiple occupancy accommodation, maintain consistency with the site's recent historical use.

8.22. The HIA demonstrates that the site does not contain any World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks/Gardens or Registered Battlefields. The site is located within the Llandudno Conservation Area and within the Creuddyn & Conwy Registered Landscape of Historic Interest.

8.23. The changes to the settings of the Listed Buildings and the location of the site within a Conservation Area and within the setting of a Registered Park and Garden have been considered and assessed using a formal and accepted method and it is concluded that the change to the physicality of assets and their settings represented by the proposed development would not lead to any negative impact to the significance of the assets.

8.24. The proposed development would have no detrimental effect on the character or appearance of the Llandudno Conservation Area and as such a neutral outcome demonstrates the proposal would be policy compliant. It is also concluded in the HIA that the proposed development would change the setting of the Haulfre Gardens but would have no negative effect on the setting of the Gardens.

8.25. Whilst the site is located within the Creuddyn & Conwy Registered Landscape of Historic Interest, the HIA confirms that the scale of development does not meet the criteria for Environment Impact Assessment. In addition, the proposed development would lead to a small change to the built form within landscape. Fenix Heritage confirms that this would have no negative impact on this landscape.

8.26. The Assessment concludes by setting out that, the changes to the historic environment represented by the proposed development would not be in conflict with any national policy provision for the historic environment or specific features which contribute to that environment and under national policy there is no reason to withhold planning permission on the basis of heritage factors.

8.27. As such, it is considered that the proposed development is in accordance with local policy (Policy CTH/1 and Policy CTH/2) and national planning policy.

Highways and Access

- 8.28. A Transport Statement (TS) has been prepared by Focus Transport Planning in support of this planning application.
- 8.29. The TS has demonstrated that the application scheme would represent appropriate and sustainable development when considered in highways and transport terms. The site is located adjacent to a mature residential area and offers the potential to encourage access by alternative sustainable travel modes to the private car for some day-to-day journeys. The proposal incorporates a suitable level of car and cycle parking, and appropriate servicing arrangements are available for refuse collection and delivery vehicles.
- 8.30. With regards to car parking, in recognition of the application site's excellent sustainable location, and the census statistics outlined within the TS, 22 on-site parking spaces are proposed, which is considered to be entirely appropriate to support the operation of the scheme. Please refer to the supporting Transport Statement for the full Parking Provision justification.
- 8.31. There is no evidence to suggest that the application scheme would give rise to a severe detrimental impact on local highway network operation, especially when considering the trip generating potential of the extant site's use. Development traffic increases would be of a strictly limited scale and would not require the provision of specific network capacity improvements.
- 8.32. Overall, it is considered that the proposed development is in accordance with local policy STR/1 and national planning policy.

Sustainable Design

- 8.33. Within the Design and Access Statement prepared by Matthew Jones Architects, section 11 sets out that the following systems will be incorporated into the building design:
- MVHR (Mechanical Ventilation and Heat recovery) system to all flats
 - ASHP (Air source Heat pumps) to all flats
 - Extensive LED lighting and daylight linked lighting control within common areas.
 - Roof mounted Photovoltaic panels
- 8.34. The photovoltaic panels form an important part of the approach to the sustainable aspect of the design. These are proposed to be located on the roof of the south-west facing roofs. In addition to providing a sustainable source of power to the building, any excess can be fed into the National Grid. The building is orientated with a south facing facade looking out towards the coast. The largest sized windows that are feasible have been incorporated into this facade to obtain the benefits of solar heat gains without overheating during the warmer months of the year. Modern glazing technologies coupled with deep recessed reveals will provide solar shading to reduce these gains in the warmer months of year.
- 8.35. The proposed materials will be sourced as sustainably as possible and will be of a robust nature to address the current local seaside climate and any impact of global climate change. The natural appearances of the selected materials aim to provide a visual enhancement now and for many years to come in the local Conservation Area.

Ecology, Biodiversity and Green Infrastructure

Preliminary Bat Roost Assessment and Emergence Surveys

- 8.36. An Extended Phase 1 Habitat Survey and Preliminary Roost Assessment has been prepared by RML in support of this planning application.
- 8.37. The Survey concludes that No Section 7 habitats would be disturbed/lost. The site is considered to be of low biodiversity value. Statutory designated sites occur adjacent to the site. There are areas of Invasive Non-Native Species (INNS) on the site which must not be disturbed or caused to spread off site by the works.
- 8.38. The Assessment also sets out the site has little value for protected or notable species, and none were recorded on site during the surveys, with the exception of herring gulls, a species of conservation concern. No bats were recorded roosting within the structures. Reasonable Avoidance Measures (RAM's) have been advised for species such as nesting birds and hedgehogs, should they be found on site.
- 8.39. It is considered that the proposed development is in accordance with local policy NTE/3 and national policy.

Green Infrastructure Statement

- 8.40. A Green Infrastructure Statement (GIA) has been prepared by The Environment Partnership in support of this planning application.
- 8.41. The GIS outlines how green infrastructure has been incorporated into the proposed scheme. It follows the stepwise approach as required by PPW to maintain and enhance biodiversity.
- 8.42. Pre application ecological surveys were conducted in 2023 to establish baseline biodiversity conditions. The site is predominantly man made with limited biodiversity value, consisting mainly of hard standing and built structures with some landscaped ornamental gardens. It was identified that some of the garden, trees and shrubs will be retained as part of the proposed development.
- 8.43. Several statutory designated sites are adjacent to or near the site, including Great Orme's Head. To mitigate potential impacts, a Construction Environmental Management Plan will be implemented during demolition and construction phases.
- 8.44. The surveys identified potential for protected species, including bats, birds, reptiles and hedgehogs. Mitigation measures include installing bat and bird boxes across the site, retaining some of the existing vegetation, new tree, shrub and hedge planting. Vegetation clearance is to be carried out outside of the nesting season.
- 8.45. Enhancement to the proposed development include planting four extra heavy standard trees, removing non invasive plants, and installing bat, bird and hedgehog boxes. This will aim to maintain the ecosystem by addressing diversity, connectivity and adaptability of habitats.
- 8.46. Green infrastructure components will be incorporated through new landscaping to replace lost vegetation, though not at the 3:1 ratio suggested in PPW 12. The document recommends that long-term management of retained and created habitats be secured through a Landscape Management Plan.

Trees and Landscaping

- 8.47. An Arboricultural Impact Assessment (AIA) and Tree Survey has been prepared by Tree Solutions in support of this application.
- 8.48. The assessment was carried out in accordance with BS 5837:2012 and included a survey of all trees within influencing distance of the development, both on and adjoining the site.
- 8.49. The survey identified 13 individual trees, 4 groups of trees, and 2 hedgerows. Most trees are situated on a steep terraced embankment to the rear of the site, with restricted rooting environments due to retaining walls and hard standing.
- 8.50. The AIA concludes that no trees of significant value will be impacted by the proposed works. The design has taken into account the long-term future of the most visually important trees in line with local policy DP/3.
- 8.51. To accommodate the new apartment block, it will be necessary to remove a hedgerow along the frontage. This hedgerow is described as an unattractive landscape feature of no particular value. Additionally, two trees (T4 and T13) are recommended for removal due to significant decay, posing a potential safety hazard. These removals are deemed necessary regardless of the development proposal.
- 8.52. Moreover, the proposed Landscape Scheme includes the introduction of 9 new trees, a gravel garden, ornamental planting and single species hedging and the retention of the tiered garden at the north of the site.
- 8.53. The AIA includes a detailed method statement and tree protection plan to ensure the preservation of retained trees during construction. This includes the erection of protective fencing, restrictions on storage and activities within root protection areas, and supervision by an Arboricultural Clerk of Works.
- 8.54. In conclusion, the assessment finds no viable arboricultural grounds for refusal of the proposed development; and introduction of a high quality landscape scheme.

Flood Risk

- 8.55. A Flood Consequences Assessment has been prepared by Weetwood Services Ltd in support of this planning application in line with policy DP/1.
- 8.56. The Development Advice Map indicates that most of the site is located in Zone A (little or no risk of flooding), with south western corner falling partially within Zone C1 (developed floodplain with flood defences). The Flood Map for Planning shows the southern boundary of the site to be in flood zone 3 (sea) and a TAN15 defended zone.
- 8.57. An assessment of flood risk from all potential sources found the risk to the proposed development to be negligible or low, with the exception of an unrealistic 'Walkaway' defence failure scenario from the North Shore. In this scenario, some flooding could impact the site access points, although the majority of the site would remain dry.
- 8.58. To mitigate any flood risks, the FCA recommends setting a minimum site level of 7.26m Above Ordnance Datum (AOD), with finished floor levels at a minimum of 7.64m AOD. The proposed access road will fall below the recommended minimum level where it connects to Abbey Road but will rise quickly above this level moving north into the site.

8.59. In line with local policy DP/4, the FCA has concluded that the proposed development would not be expected to have an adverse impact of flood risk elsewhere. With the recommended mitigation measures implemented, the flood risk to the site is considered acceptable for the proposed residential use.

Sustainable Development

8.60. In line with the Wellbeing of Future Generations Act, which defines 'Sustainable Development' as follows 'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals', it is considered that the proposed scheme adopts the principles of sustainable development.

8.61. The proposed scheme is for the redevelopment of a brownfield site which will provide a new build scheme to deliver energy efficiencies and therefore reduce carbon emissions which will lend itself well to the residents of the affordable homes. The enhanced landscaping that has been proposed as part of the scheme will also bring environmental benefits by allowing existing and new habitats to evolve at the site.

8.62. The introduction of new homes in the Llandudno area will allow people to improve their economic wellbeing due to the security of quality homes which are also affordable, in turn improving their health, resulting in the ability to find and secure work (where they do not already have work). Not only does this benefit the individual resident, but the Llandudno area due to money being earned and spent within the locality.

8.63. Accessibility to good quality housing also provides social benefits. Affordable, safe and comfortable living conditions contribute to reduced stress, anxiety and depression, therefore leading to an improved quality of life. On a community scale, well designed neighbourhoods with quality housing foster social cohesion and tend to have lower crime rates, contributing to safer and more engaged communities.

8.64. The application site represents a suitable location for residential development, being located at an established residential area, on the edge of Llandudno town centre, and within an accessible location. The site is particularly accessible as it is within a practical walking distance of regular frequency public transport services (by bus and train) and a wide range of everyday local shops, services & facilities.

8.65. The Site benefits from well maintained pedestrian routes which provide adequate connectivity to the site. The surrounding Llandudno local centre demonstrates good accessibility features, including strategically placed dropped kerbs and tactile paving at pedestrian crossing points, which enhance the overall pedestrian experience and support inclusive mobility.

8.66. Overall, the proposed development meets the overarching objectives of the local development plan, PPW and the Wellbeing Act, therefore bringing significant well being and sustainability benefits.

9. Conclusions

9.1. This Planning Statement has been prepared on behalf of Wales and West Housing Association in support of the full planning application for the demolition and redevelopment of Loreto Convent to provide new affordable housing accommodation at Abbey Road, Llandudno. The proposed description of development is as follows:

‘Proposed demolition and redevelopment for an affordable housing apartment block comprising 30no. apartments (Use Class C3) and 6no bungalows (use class C3), Loreto Convent, Abbey Road, Llandudno’

- 9.2. The principle of residential development on the site is established and considered acceptable, given its location within the Llandudno Settlement boundary and the surrounding residential context. The proposal for 100% affordable housing exceeds the Council's target of 35% for the Llandudno area, addressing a significant local need as identified in the Local Housing Market Assessment.
- 9.3. The design of the development respects the character of the Llandudno Town Centre & Seafront Conservation Area, with careful consideration given to scale, massing, and materials. The Heritage Impact Assessment concludes that the proposed development would not adversely affect the setting of nearby Listed Buildings or the character of the Conservation Area.
- 9.4. The Transport Statement demonstrates that the site is in a sustainable location with appropriate parking provision and would not have a severe impact on the local highway network.
- 9.5. The development incorporates sustainable design features, including Mechanical Ventilation with Heat Recovery systems, air source heat pumps, and photovoltaic panels, aligning with local and national sustainability policies.
- 9.6. Ecological assessments show the site to be of low biodiversity value, with appropriate mitigation measures proposed where necessary. The Arboricultural Impact Assessment confirms that no trees of significant value will be impacted by the proposed works. A high-quality landscape scheme, introducing nine new trees is also proposed. The Flood Consequences Assessment concludes that, with recommended mitigation measures, the flood risk to the site is acceptable for residential use.
- 9.7. In light of these conclusions, it is considered that the proposed development accords with relevant local and national planning policies. The scheme will deliver much needed accessible and high quality affordable housing meeting Lifetime Homes Standards in a sustainable location, while respecting the character of the area and addressing relevant environmental considerations to deliver sustainable development. As a high quality development, it will also bring clear wellbeing benefits to its residents. Overall, the proposed development meets the overarching objectives of the local development plan, PPW and the Wellbeing Act , therefore bringing significant well being and sustainability benefits. Therefore, it is respectfully requested that planning permission be granted for this development.

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