

PLANNING COMMITTEE	DATE: 02/03/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 2

Application Number: C25/0651/23/LL

Date Registered: 22/09/2025

Application Type: Full

Community: Llanrug

Ward: Llanrug

Proposal: Full planning application for 17 affordable dwellings, together with the creation of new vehicular access and an internal access road, the closure of 2 existing agricultural access points, the creation of a new access to serve a new substation, extension works to Ffordd Glanffynnon along with landscaping, drainage and other associated works.

Location: Land off Ffordd Glanffynnon, Llanrug, LL55 4PT

Summary of the Recommendation: To approve with conditions and a 106 agreement or unilateral agreement for open space/play contribution.

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1. Description:

- 1.1 A full planning application for the erection of 17 affordable dwellings, along with the creation of new vehicular access and an internal access road. It is proposed to build five 2 bedroom two-storey houses, four 2 bedroom bungalows, six 3 bedroom two-storey houses, one 4 bedroom bungalow and a 5 bedroom two-storey house.
- 1.2 The single-storey and two-storey houses would have a simple and plain design without architectural features. The applicant states that it is proposed to provide 100% affordable housing within the scheme with a mix of social and intermediate rented tenures.
- 1.3 It is proposed to maintain a 3-metre-wide easement between the development and a watercourse running along the eastern boundary of the site, create an ecological corridor in the southeastern corner of the site and develop a water retention basin in the north and south corners of the site.
- 1.4 The site of the application measures approximately 0.74 ha. and is bordered by existing residential dwellings to the south, Ffordd Glanffynnon to the west, an agricultural field and overgrown vacant land to the east and residential houses to the north. The land consists of three fields currently used for sheep and cattle grazing and has been assessed and classified as an Agricultural Land Class (DTM) Levels 3b and 4. The site gradually slopes downwards from the west toward the watercourse along the eastern boundary.
- 1.5 It is proposed to construct a new access to the adjacent unclassified county road to serve the new estate. Regarding landscaping issues, it was stated in the ecological report (trees) and landscaping plan that most of the hedge that runs alongside the county road along the western boundary of the site is to be retained.
- 1.6 It is not proposed to change the location of the public footpath which is situated at the centre of the site and runs from west to east.
- 1.7 The site is located outside the Llanrug development boundary as set out in the Joint Local Development Plan but with the northern corner of the site touching the development boundary.
- 1.8 The following documents were submitted as part of the application.
 - Land quality report
 - Gradiometer Report
 - Flood modelling report
 - Drainage Strategy
 - Water conservation statement
 - Development Impact Assessment
 - Flood Consequence Assessment
 - Porosity Report
 - Utility Study
 - Reptile Survey
 - Preliminary ecological evaluation
 - Geological Environmental Report
 - Green infrastructure statement
 - Transport Statement
 - Design, access and planning statement
 - Pre-application consultation report
 - Scheme Delivery Statement
 - Trees Statement

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- Affordable Housing Statement
- Evidence of need and letting strategy

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), the development that is the subject of this application is defined as a "major development" due to the number of units proposed. In line with the appropriate procedure, a Pre-application Consultation Report was received as part of the application. The report shows that the developer advertised the proposal to the public and statutory consultees prior to submitting a formal planning application. The report includes copies of the responses received at the time.

2. Relevant Policies:

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

2.2 The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the 7 well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

2.3 Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017

PS 1 The Welsh Language and Culture

ISA 1 Infrastructure Provision

ISA 5 Provision of existing open spaces

PS 4 Sustainable Transport, Development and Accessibility

TRA 2 Parking Standards

TRA 4 Managing transport impacts

PS 5 Sustainable development

PS 6 Alleviating and adapting to the effects of climate change

PCYFF 1 Development Boundaries

PCYFF 2 Development Criteria

PCYFF 3 Design and place shaping

PCYFF 4 Design and Landscaping

PCYFF 5 Carbon Management

PCYFF 6 Water Conservation

PS19 Conserving and enhancing the natural environment

AMG 5 Biodiversity Conservation

PS20 Safeguarding and Where Relevant Improving Heritage Assets

AT1 Conservation Areas, World Heritage Sites and Scheduled Historic Landscapes, Parks and Gardens

PS 17 Settlement Strategy

TAI 16 Exception Sites

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HOUSING 8 Appropriate Mix of Housing
TAI 15 Threshold of Affordable Housing and their Distribution

Supplementary Planning Guidance (SPG):

SPG: Maintaining and Creating Distinctive and Sustainable Communities

SPG: Housing Mix

SPG: Affordable housing

SPG: Planning obligations

SPG: Open Spaces in New Housing Developments

2.4 National Policies:

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 12 - February 2024)

Technical Advice Note 12 - Design

Technical Advice Note 15 Development, flooding and coastal erosion

Technical Advice Note 16 Sports, Leisure and Open Spaces

Technical Advice Note 2 Planning and affordable housing.

Technical Advice Note 20 Planning and the Welsh Language

Technical Advice Note 18 Transport

3. Relevant Planning History:

No current planning history.

4. Consultations:

Community/Town Council: No response.

Transportation Unit: The applicant has responded to all the concerns raised by the Highways Authority and we are satisfied that the applicant has dealt with all the issues identified. Following this, the Transportation Unit has no objection to the application.

NOTE: The applicant is directed to contact the Street Works Manager to obtain permission under Sections 38 and 278 of the Highways Act, 1980 for the development of a new residential estate road and for the imposition of permanent alterations to the public highway.

Further comments because of local residents' concerns:

Traffic Assessment

The current Transport Statement provides an initial picture of the expected increase in traffic on the network as a result of the development. However, in order to carry out a thorough assessment, we ask the applicant to submit a detailed assessment of the existing traffic on Ffordd Glanffynnon over a full week period, paying

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particular attention to the impact during peak hours, particularly outside the surrounding school.

Road Safety Inspection

The Service is concerned about the impact of the increase in traffic as a result of the development on Ffordd Glanffynnon on safety, particularly on the corner before reaching the site. While the developer has proposed widening the road, it's unclear what the impact would be on the safety of vehicles and other users, especially on the corner.

We therefore ask the applicant to undertake a **Road Safety Inspection** for the whole plan and provide detailed information about how it will respond to any problems identified. In particular, details are needed on the elements relating to the widening of the road and the proposed improvements to the road.

Further observations following receipt of the plan dated 04.02.2026

I would like to confirm that we have reviewed and noted the changes to the plan to widen the road, along with the Safety Assessment. The additional information provided is in response to our observations on the plan.

I would like to submit the following response to the safety issue raised by YGC in their safety study, namely the visibility of the pavement.

This concern has been identified in the safety review, and I would expect the recommendation to be considered as part of the detailed design that will be submitted under agreement 278. As the recommendation relates to a matter of technical detail and does not affect the overall layout of the development, it is our view that it is not an issue that requires attention as part of the decision on the planning application.

Natural Resources Wales:

Thank you for re-consulting Natural Resources Wales (NRW) regarding the above, which we received on 24/12/2025.

We have concerns regarding the application as submitted. However, we are satisfied that these concerns can be overcome if the document set out below contains the following in the condition of the plans and approved documents on the notice of decision:

- **Enfys Ecology Ltd., Ffordd Glanffynnon, Llanrug, Preliminary Ecological Appraisal (PEA), 22/5/2025**

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Please note that without the inclusion of this document, we would object to this planning application. Further details are provided below.

Protected Species

We have reviewed the following information submitted in support of the application:

- Enfys Ecology Ltd., Ffordd Glanffynnon, Llanrug, Preliminary Ecological Appraisal (PEA), 22/5/2025

Bats

We note that the Lead Ecological Appraisal has noted that bats are likely to use the site for foraging and commuting, with the potential for bat nesting characteristics in mature trees on the site.

Bats and their breeding and roosting sites are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection afforded to them, development may only proceed under a licence granted by Natural Resources Wales, having met the three tests set out in the regulations. (Please refer also to paragraph 6.3.7 of Technical Advice Note 5: Nature Planning and Conservation). Please note that for the purposes of providing advice at the planning application stage, our observations are restricted to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

We believe that the above report provides a sufficient basis to consider the potential impacts of the scheme on this species and inform the decision-making process.

We agree with the mitigation measures set out in section 6.3.2 of the report submitted.

Therefore, we advise that the following document be included in the approved list of plans/documents within the decision notice:

- Enfys Ecology Ltd., Ffordd Glanffynnon, Llanrug, Preliminary Ecological Appraisal, 22/5/2025

Otters

We note that the Preliminary Ecological Appraisal considers that otters may temporarily use the site for foraging or commuting, we agree with the reasonable avoidance measures outlined in section 6 and advise that these are retained.

Pollution Prevention

The Rhos river lies within the boundaries of the site. We note the buffer strip and 3m ecology corridor as shown on the proposed site plan (DWG NO. FGL-SAL-A1-ZZ-DR-A-003).

Please inform the developer: During the construction phase, precautions should be taken to prevent contamination of surface

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water drains and local watercourses. Oils and chemicals should be stored in contaminated areas and spill kits should be readily available in case of accidental spillages. For further guidance, please refer to 'Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water', and 'GPP 6: Working on construction and demolition sites', available on the NetRegs website.

Land Pollution

We have reviewed the Phase 1 Desk Study and the findings of the Phase 2 Invasive Site Investigation (presented in the Geological Environmental Report, Cadarn Consulting Engineers Ltd, Reference 5824L-CCE-XX-XX-RP-S-0001, dated July 2024). Based on the information provided, we have no concerns to raise in relation to land pollution.

Flood Risk

The Flood Map for Planning states that the site of the application is within Flood Zone 1, and therefore at low risk of flooding. We have no further observations on flood risk.

As they fulfil the role of the Lead Local Flood Authority, we recommend that you contact the Local Authority's Drainage Department for further advice in relation to the proposed site drainage. We advise that any proposed surface water drainage scheme should ensure that run-off from the proposed development is reduced or will not exceed existing run-off rates. Adoption and management details should also be submitted to ensure that the plan/systems remain effective for the life of the development.

Observations on local residents' concerns:

Thank you for forwarding some of the concerns related to the proposed development above. We note that some of the concerns that have been identified are drainage and wildlife concerns.

In relation to drainage concerns, the Flood Map for Planning states that the application site is within Flood Zone 1, and therefore at low risk of flooding. We have no further observations on flood risk. As they fulfil the role of the Lead Local Flood Authority, we recommend that you contact the Local Authority Drainage Department for further advice in relation to the proposed site drainage. We advise that any proposed surface water drainage scheme should ensure that run-off from the proposed development is reduced or will not exceed existing run-off rates. Adoption and management details should also be submitted to ensure that the plan/systems remain effective for the life of the development.

For any concerns about foul water drainage, this should be discussed with Welsh Water.

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In relation to wildlife concerns, we refer to our response of 16 October 2025. We recommend that you discuss the need to secure further ecological measures / avoidance / lighting measures with your in-house ecological advisor

Welsh Water:

Firstly, with respect to the submitted application form and accompanying Drainage Strategy, we acknowledge that the development proposes to discharge foul and surface water flows to a public sewer and watercourse respectively.

FOUL WATER

The proposed development site is located in the catchment of a public sewerage system which drains to Llanrug Wastewater Treatment Works (WwTW). We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system.

SURFACE WATER

Turning to surface water drainage, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. In this instance, we offer no objection to proposals for disposal of surface water flows into a surface water body, in principle, subject to consultation and agreement with the regulatory body or riparian owner of this system.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

Capacity is currently available in the water supply system to accommodate the development. We reserve the right however to reassess our position as part of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the Advisory **Notes** are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

Rights of Way Unit

I refer to the above application. Public Rights of Way (Footpath) number 74 in the Community of Llanrug is affected by this proposal

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(See plan above). As can be seen, the footpath crosses the site. Public safety takes priority here, and the applicant must contact the Rights of Way Unit at Llwybrau@gwynedd.gov.wales, to discuss the temporary closure of the route. It will also be an opportunity to discuss the design of the footpath with the officer. The applicant will also need to accept that the path is expected to be at least 2 metres wide.

Heneb

Thank you for consulting us on this application. As detailed in the submitted documents, the application site has been subject to staged archaeological evaluation, comprising desk-based assessment, geophysical survey and trial trenching. We have monitored this work on behalf of the council and can confirm that all stages have been carried out in accordance with the relevant professional standards. The fieldwork established that archaeology is absent from most of the site but confirmed the presence of a Late Bronze Age burnt mound in the south-eastern field. Burnt mounds vary widely in form but typically consist of a lined earth-dug trough, fire pits or hearths, other pits and postholes, and a large mound of burnt stone. Although relatively common features, they are important indicators of settlement and a principal source of evidence for this period. The burnt mound is not of sufficient importance to merit preservation in situ, but does need to be properly excavated and recorded to mitigate its loss as a result of the development.

In light of the above observations and in accordance with Planning Policy Wales 12 and TAN24 The Historic Environment, it is recommended that, should planning permission be granted, the local planning authority should require that a proportionate mitigation programme is put in place. The following condition wording is suggested to secure such work:

(i) No development (including any topsoil strip, site clearance or other groundworks) shall take place until a written scheme of investigation for archaeological work has been submitted by the applicant (or their agent or successors in title) and approved in writing by the Local Planning Authority. The development shall be carried out and all archaeological work completed in accordance with the approved written scheme of investigation.

(ii) A detailed analytical final report on the archaeological work described in the approved written scheme of investigation shall be submitted to the Local Planning Authority within 6 months of completion of archaeological fieldwork. The report must be approved in writing by the Local Planning Authority.

Reasons: 1) To ensure the implementation of an appropriate

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programme of archaeological mitigation in accordance with the requirements of Planning Policy Wales 2024 and TAN24: The Historic Environment.

2) To ensure that the work will comply with MORPHE/Management of Archaeological Projects (MAP2) and the Standards and Guidance of the Chartered Institute for Archaeologists (CIfA).

The mitigation programme should entail the targeted excavation of the burnt mound and any associated features that were not revealed in the trial trenching, together with subsequent analysis, reporting and archiving as necessary according to the discoveries made. All aspect of the mitigation programme must be undertaken by a professional archaeological firm experienced in work of this nature.

Land Drainage Unit

A full SDC application has been submitted for this development. The CCS has been in discussions with the agent and there are only a few small points that need to be addressed before we can issue a certificate of approval. Because of this, we have no objections to this planning application.

Biodiversity Unit

The ecological reports have been completed to a good standard – this development follows the stepwise approach by avoiding and retaining significant biodiversity features as far as reasonably practicable, and offering appropriate mitigation, compensation and enhancement measures to achieve a Net Benefit for Biodiversity, as shown in the soft landscaping design plan.

Planning should be conditioned in strict conformity with the landscaping design and RAMS provided in both ecological reports (PEA and Reptile Survey) and the arboricultural report – particularly regarding reptile translocation and tree root / stream protection areas and fencing prior to commencement of works.

Water and Environment Unit
YGC

The site of the proposed development is partly located within Flood Zones 2 and 3 (Surface Water and Small Watercourses) as shown in the Flood Map for Planning. As such, and in accordance with part 6 of TAN 15, the applicant has submitted a Flood Consequences Assessment as part of the application (Cadarn, June 2025 – version 3 received in December 2025). We have reviewed the Flood Consequences Assessment (FCA) and are satisfied with the level of risk shown to the development for various events, and also that there is no increase in flood risk to properties beyond the proposed development site.

INFORMATION: An open watercourse runs along the eastern boundary of the proposed development and the new development will

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need to consider this ditch and ensure that it can be maintained in the future. We recommend a corridor of 3m (minimum) from the shore of the undeveloped watercourse to enable this. An Ordinary Watercourse Consent will be required for any work that could affect the flow of this culvert, and the developer should contact FCRMU@gwynedd.llyw.cymru to seek further advice.

Language Unit:

The risk/impact on the language identified by the applicant:
Generally beneficial

Language Unit's brief opinion:

This is a comprehensive Language Assessment, which outlines the linguistic context, not only within the boundaries of Llanrug Community Council (which is the application area), but also within the nearby Llanddeiniolen Community Council and Waunfawr Community Council areas, including the latest language statistics available from the 2021 Census, as well as a breakdown by age groups. The author has also outlined the need locally in providing Housing Options and Tai Teg statistics, as well as the history of planning applications in the area.

The information in the assessment supports the linguistic risk/impact identified above.

Education Unit:

Given the capacity available in the Primary and Secondary Schools and the number of children that would result from the development, it is seen that capacity is currently available in the local schools.

Public Protection:

Not received

Housing Strategic Unit:

Information about need:

The following indicates the number of applicants who wish to live in the area:-

131 options on the Tai Teg register for intermediate properties

292 applicants from the common housing waiting register for social property

Data source:

Tai Teg

Cyngor Gwynedd's Common Housing Register

Observations:

** The figures could be duplicated **

Information on the type of need:

The following shows the number of bedrooms that the applicants wish

to have:

Number of bedrooms (Tai Teg)

Number of bedrooms	Need as a %	rent	buy
1 bed	2%	8%	1%
2 bed	39%	32%	17%
3 bed	53%	17%	20%
4+ bed	6%	2%	2%

Number of bedrooms (Housing Options Team)

Number of bedrooms	Need as a %
1 bed	27%
2 bed	43%
3 bed	22%
4 bed	8%
5 bed	1%

Data source:

Tai Teg

Cyngor Gwynedd's Common Housing Register

** The figures could be duplicated **

Suitability of the Plan:

Based on the above information it appears that the Scheme :-

Meeting the area's needs

Schemes are expected to include 20% of affordable housing.

It is noted that 100% of the units will be affordable as part of this scheme

If a Housing Association is a partner for this development, the design of the property must conform with WG standards (DQR).

Please note that the application is on behalf of the Adra housing association and therefore requires compliance with WG standards (DQR)

The plan has been included within the programme to receive a Social Housing Grant from the Welsh Government.

These schemes contribute directly to the aim of the Cyngor Gwynedd's Housing Action Plan to provide more housing to meet

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with the current high demand that exists in the county.

Public Consultation:

A notice was posted on the site and nearby residents were notified and correspondence was received objecting on the grounds of:

- Road safety, increased traffic and traffic volume during certain times, existing roads are dangerous and narrow, sub-standard junction, on-road parking and emergency vehicle access.
- Concerns about pedestrian safety and impact on the public footpath.
- Impact on the School/no intention to extend the School.
- Puts extra pressure on the local health service.
- Doubt and concern over the number of houses.
- Concern about the sewerage situation.
- Concerns over Biodiversity.
- Surface Water and wet ground concerns.
- Concerns over the development of grassland/ an exception site rather than within the boundary and that it sets a precedent.
- Premature application due to no new Development Plan.
- Impact on amenities of nearby residents due to air pollution.
- Setting a precedent for similar developments.
- Visual and landscape impact.
- Concerns about flooding.
- Installing an electricity station and relocating a cable near a neighbour's house.
- There are empty houses in the village at present.

As well as the above objections, objections were received that were not material planning objections and these included:

- Doubts about the use of the field
- Discussions about developing other sites

Correspondence in support:

- No social housing has been built in Llanrug for years

5. Assessment of the material planning considerations:

The principle of the development

- 5.1 The site in question is located outside the Llanrug development boundary as set out in the Joint Local Development Plan but directly adjoins the development boundary. In this respect the site can be regarded as an exception site in terms of the requirements of Policy TAI 16 (Exception sites) of the Joint LDP.

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- 5.2 Policy PCYFF 1 ('Development Boundaries') states that outside development boundaries, proposals will be refused unless they are in accordance with specific policies in the Plan or national planning policies or that the proposals show that their location in the countryside is essential. Policy TAI 16 ('Exception Sites') enables the development of housing on sites that are outside but abutt the development boundaries but must ensure that the proposal complies effectively with the Policy requirement. This site has not been designated or protected for any specific land use.
- 5.3 Criterion (3) in Policy PCYFF 2 seeks to ensure that the best use of land is made, including a density of at least 30 living units per hectare for residential development (unless there are local circumstances or site constraints which dictate a lower density). The proposal includes the construction of 17 residential houses along with an estate road on land measuring approximately 0.74 ha. This means that the density of the proposal is approximately 22 units per hectare, which is significantly less than the figure of 30 in the Policy. It is noted that information submitted with the application states that the density is lower than that required by Policy PCYFF 2 due to site constraints and the need to accommodate SuDS features and areas for ecology enhancement. This is realised, and that the northern part of the estate road serves housing on one side only.
- 5.4 The indicative supply level of housing for Llanrug over the Plan period, as noted in Appendix 5 of the Joint Local Development Plan, is 61 units (including a 10% 'slippage allowance', which means that the method of calculating the figure has taken into account potential unforeseen circumstances which could influence the provision of housing, e.g. land ownership matters, infrastructure restrictions, etc.). In the period 2011 to 2025 a total of 53 units have been completed in Llanrug (38 on random sites and 15 on T44 and T45 house designations). The windfall land bank i.e. sites with existing planning permission on sites not designated for housing, in April 2025 was 10 units. One unit on T44 designation (Cae'r Ysgol) remains in the land bank (did not commence in April 2025).
- 5.5 This proposal would therefore involve provision that would exceed the indicative supply figure for Llanrug considering the units already completed during the life of the Plan and the units in the land bank.
- 5.6 The Plan's Monitoring Framework will consider the number of units that will be completed annually to determine whether the Scheme meets the housing requirement. 1317 units were completed between 2011 and 2025 in each Local Service Centre and 297 were in the land bank in 2025. This means there is a shortage of 92 units within the entire tier. Based on the completion rate to date within the Local Service Centres category this proposal is acceptable given the current situation.
- 5.7 However, as the proposal would involve going beyond its local indicative growth level, a justification is needed for this development, and it is noted that the proposal has been introduced to meet a recognised need for affordable housing.
- 5.8 Evidence was presented in the form of an Affordable Housing Statement, Evidence of Need and Letting Strategy. This information is the justification for the need for these 17 houses. The information submitted refers to a need highlighted on the Social Housing and Tai Teg Register in Llanrug as well as Cwm-y-glo as a village with a development boundary located within 6km of Llanrug. It is believed, therefore, that the situation in terms of the level of growth in this settlement needs to be considered as well. This is as follows:

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Cwm-y-glo – Indicative supply = 13; Housing units completed (2011-25) = 10; Land bank = 5; Remaining shortfall = -2

- 5.9 Policy TAI 8 promotes proposals that will contribute towards improving the balance of housing and will meet the needs noted for the entire community. Therefore, there is a need to consider whether the mix of units and tenure proposed here is suitable to promote a sustainable mixed community. It is therefore important to consider the contents of the 'Housing Mix' SPG when establishing whether the proposal is suitable, and it is noted that the guidance expects all applicants submitting a planning application for a Use Class C3 housing development consisting of 5 or more housing units to submit a Housing Statement in support of their planning application. As noted in the application documents, the proposal compares well with the need that has been highlighted in Llanrug, noting that a specific need has been highlighted for the 5 bedroom house for residents of the housing association within the village.
- 5.10 The Plan's List of Glossary Terms defines Local Need Affordable Housing within or on Local Service Centre exception site as; "... people in need of an affordable house who have resided within the Local Service Centre or in the surrounding rural area for a continuous period of 5 years or more, either immediately before submitting the application or in the past..."

Paragraph 8.1.3 of the Affordable Housing SPG gives a definition of the 'surrounding rural area' as:

"'surrounding rural area', which is a distance of 6km from the site of the application and the extent of any Community Council area bisected by the 6km distance, but excluding properties within the development boundary of any settlement other than the settlement within which the application is located."

It is known that the Social Housing Register contains a 5-year local connection confirmation, but it is not entirely clear what the length of the local connection is for those currently on the Tai Teg register, and the Tai Teg register figure has been filtered to include only those with a 5 year connection. The proposal will provide a scheme with a mix of social rent and intermediate rent.

- 5.11 Evidence was submitted as part of the application for the need for affordable housing in Llanrug. The information submitted includes confirmation that the number on the Social Housing Register with a 5-year connection for Llanrug is 22, and the number for the Tai Teg Register is 26 which gives a combined figure of 48. There is no designated housing site available in Llanrug, and there are extant permissions for 4 affordable units and opportunities for windfall affordable housing provision are limited to one or two units. This means that the combined and current figure for need for affordable housing in Llanrug is 42, having considered other opportunities available in Llanrug. Information has been provided which confirms that Adra's housing stock in Llanrug (67 houses) includes underusing and overusing existing houses in terms of size and number of bedrooms. This means that the need for 2 bedroom houses is higher, and it justifies the need for the 5 bedroom property. Having given regard to all the information that has been submitted, it is considered that it is sufficient to prove a specific need for this proposal on the outskirts of the village. As has already been stated, there is an intention to meet the need for affordable housing in the neighbouring village of Cwm-y-glo as a priority as well as Llanrug. To this end evidence has been provided showing the number on the Social Housing Register with a 5-year connection for Cwm-y-glo at 7 and the Tai Teg Register at 3 which gives a combined figure of 10. It is possible that this figure includes duplication with Llanrug's combined figure, and therefore it is not considered appropriate

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to consider this figure only an additional need, but as there is no opportunity for housing development in the village and there are no current applications or permits for affordable units, and due to the proximity of the village to Llanrug, it is considered that it is acceptable for this development to meet the need of Cwm y Glo as well. There is no opportunity for housing development in the village and there are no existing applications or permissions for affordable units.

5.12 As noted above exception sites normally provide for the need of the village itself, together with the 6km surrounding rural area and excluding villages with development boundaries within this area, but in this case the information submitted shows that Cwm-y-glo (which is within the 6km area) is unable to meet its need for affordable units. To this end, this proposal is therefore an opportunity to satisfy a proven need for affordable units through this site, and it is considered that sufficient information has been received to include the need of Llanrug and Cwm-y-glo in the development.

5.13 Paragraph 4.1.7 of the Affordable Housing SPG confirms:

"Where the main sources (LHMA, Common Housing register and Tai Teg) or evidence submitted by the applicant have not identified a need for Local Need Affordable Housing in a rural area (e.g. because the households concerned have not chosen to register their need or priority for specific settlements) then a local survey is the best way to demonstrate a need for affordable housing. The survey should be carried out by a qualified individual / company / service, such as a Rural Housing Facilitator and the methodology should be agreed with the Council"

5.14 In this case therefore, as the need has been proven from the main sources and evidence from the applicant, in accordance with the requirements of the SPG there is no purpose to carry out a local survey by a Rural Housing Facilitator.

5.15 It is therefore considered that the application provides sufficient information as to the justification of the mix and type of housing provided and how the proposal will meet the needs of the local community. This is echoed in the response received to the consultation from the Strategic Housing Unit which confirms that the Plan addresses a need in the area.

5.16 The need for evidence is completely essential to undertake a full assessment and is a fundamental requirement with this type of application and to this end the proposal is for housing where an affordable local need has been proven on a site located outside but abutting the development boundary for Llanrug. It is considered that the proposal forms a logical extension to the village and therefore fully conforms to the requirements of policies PCYFF 1 and 2, TAI 8, TAI 15 and TAI 16 of the Local Development Plan as well as the relevant advice provided by the Supplementary Planning Guidance and national guidance within Planning Policy Wales and the Technical Advice Notes.

Visual amenities

5.17 Policy PCYFF 3 states that proposals will be approved, including extensions and changes to existing buildings and structures, if they comply with a number of criteria including that the proposal adds to or improves the character or appearance of the site, the building or the area in terms of setting, appearance, scale, mass, the height and elevation treatment; that it respects the context of the site and its place in the local landscape; that it uses materials that are appropriate to their surroundings and incorporates soft landscaping; that it improves a safe and integrated transport and communications network; that it limits the risk and danger of flood water run-off and prevents

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pollution; that it achieves an inclusive design that allows access for all and helps to create healthy and vibrant environments taking into account the health and well-being of future users.

- 5.18 The application involves the development of a green field into an estate of residential housing. The site is located on the outskirts of the village and outside its development boundary. There are dwellings to the south, Ffordd Glanffynnon to the West, an agricultural field and overgrown vacant land to the east and the village's residential houses to the north. The land consists of three fields that are currently used for sheep and cattle to graze on. A *clawdd* and hedge run along the boundary of the site with the Ffordd Glanffynnon.
- 5.19 The proposal would include opening a gap in the *clawdd* for the creation of a new access in the southern part of the site. The tree report states that it is proposed to retain the hedge along the boundary of Ffordd Glanffynnon, a grove of native trees in the northeast corner, an oak tree at the boundary of Ffordd Glanffynnon and an oak tree in the middle of the site. The houses are of a design that resembles those seen in the village and subject to a suitable finish are considered acceptable. A landscaping plan was submitted showing hedges and trees to be preserved, and as this proposal is located on the outskirts of the village, it is considered acceptable and will not have a significant adverse effect on the character of the area or the wider landscape. It is therefore considered that the proposal is acceptable based on compliance with the relevant requirements of policies PS 5, PCYFF 3 and 4 and TAI 16.

General and residential amenities

- 5.20 The application was advertised in the press, on the site and nearby residents were informed and correspondence was received objecting to the proposal and in support of it. Points of support and objection are set out above.
- 5.21 The site is located outside the development boundary and as such is not surrounded by housing. The house closest to the site of the application is located approximately 13 metres to the north, the rear design of that house would face the side elevation of a bungalow on the proposed estate. The southern boundary of the site would be the width of small field away from a dwelling called Afon Rhos. The houses on the Minffordd estate to the west on the opposite side of the county road and are afforded some shade by a road hedge. It is unlikely that the proposal would have a significant negative impact on the privacy of nearby residents. With regard to the impact of noise emanating from the activities and traffic of a new housing estate, it is not anticipated that it would significantly disrupt nearby houses.
- 5.22 The site plan indicates that it is proposed to place a small substation building between plot number 8 and a property known as Glanffynnon Bungalow together with the removal of the electricity cables above the site and installing them above ground in this area, with the exact location of the cables to be confirmed. The substation will be landscaped with a native hedge to be planted around it, and it is considered that there is sufficient distance between it and the surrounding houses. No observations have been received from Public Protection at the time of writing this report, but it is considered that any noise concerns could be mitigated with measures to reduce it such as insulation, increased landscaping or an acoustic barrier. Moving the overhead cables would be subject to separate consideration under the Electricity Act as electricity consultants have delegated rights for the provision of poles / cables.

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5.23 To this end, the proposal is not considered to have a significant adverse effect on the amenities of neighbouring residents and therefore the proposal is considered acceptable and complies with the requirements of policy PCYFF 2 of the LDP.

Transport and access matters

5.24 The proposal involves developing a housing estate on a green field. It is proposed to construct a new access to the adjacent county road at the southern end of the site. The work would involve creating a gap with visibility lines in the existing *clawdd*. The road is narrow and narrows near a bend in the road to the south and the access to the village to the north of the site. It is also noted that the new access is located approximately 40 metres into a blind bend in the county road.

5.25 Extensive correspondence was received from local residents raising significant concerns about the impact of the proposal on road safety and as a result, further information was received in the form of a Road Safety Audit from the applicant which includes an examination of the plans and other information. The report looks at the safety implications of the proposed highway. It considers the problems arising from the proposals and the measures that will be required for their resolution in order to improve the safety of the scheme and reduce accident incidents.

Mainly, the report refers to 3 sites:

- 1) End of pavement footway from the estate to the village.
Vehicles travelling south may not see the footway and could drive over it or hit the footpath, especially at night. This could result in the vehicle coming into contact with pedestrians or vice versa, resulting in a collision that causes injury to the pedestrians, plus the vehicle may have to slow down suddenly which can lead to a rear-end shunt type collision with the vehicle following from behind.
Recommended - The end of the pavement would need to be illuminated with road markings or low posts to warn road users.
- 2) Lines of visibility from the intended access.
It is likely that a hedge on the south side of the proposed access would create a barrier for users of the access and impair road safety.
Recommend - Ensure adequate visibility lines.
- 3) No road signs. That would result in road users making inappropriate movements.
Recommend standard signage.

5.26 Further to this survey, discussions have taken place between the applicant and the Transportation Unit and there is a plan that indicates improvements which include widening the right turn from the site (on highway land only) and the latest observations from the Transportation Unit confirm that the proposal is now acceptable on the basis of the improvements included and issues such as technical details and issues which would be subject to an s278 agreement that is separate to the planning permission. To this end, whilst the objections that have been received regarding road and pedestrian safety, parking and increased traffic are acknowledged, the proposal is considered to be acceptable on the basis of the above assessment and does not contravene the requirements of policies PS4, TRA 2 and 4 of the LDP.

Biodiversity matters

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- 5.27 It is proposed to develop an agricultural field for the creation of a residential housing estate. The work would include excavating the field, constructing water retention ponds, demolishing the inner *clawdd* of the field along with the removal of a hedge and brambles along the boundary *clawdd* for laying out the estate. It is also planned to undertake a landscaping scheme including an ecology corridor in the south-east corner of the site. The Department consulted with the Council's Biodiversity Unit and observations were received confirming that it was satisfied with the proposal subject to adhering to the landscaping plan and the mitigation and enhancement measures contained in the surveys submitted as part of the application. In view of this, the proposal is considered acceptable and complies with the requirements of policies AMG 5 and PS19 of the LDP together with chapter 6 of Planning Policy Wales.

Archaeological Matters

- 5.28 The application site has undergone an archaeological assessment, including internal evaluation and geological survey and drilling tests. Heneb submitted observations stating that the work at every stage had been carried out in accordance with the relevant professional standards. Fieldwork found that archaeology was not present at most of the site, but confirmed the presence of a Late Bronze Age burnt mound in the field to the east. It is recommended that a further archaeological examination be made conditional and this is considered acceptable and therefore in compliance with the requirements of policies PS20 and AT1 of the LDP.

Flooding matters

- 5.29 It is proposed to develop an agricultural field for the construction of residential housing. The site is in open countryside with a watercourse running along the eastern boundary of the site. During the application phase, the Department received correspondence from local residents stating that there were surface water problems at the site and nearby lands.
- 5.30 The applicant submitted a Flood Consequence Assessment stating that the site is within flood zones 2 and 3 (Surface Water and Small Watercourses) as defined in TAN: Development, Flooding and Coastal Erosion 15 published in March 2025. Observations were received from Natural Resources Wales (NRW) stating that the Flood Map for Planning states that the site of the application is within Flood Zone 1 and is therefore at low risk of flooding. The Council's Water and Environment Unit confirmed that it had reviewed the Flood Consequence Assessment (FCA) and was satisfied with the level of risk shown to the development for various events, and also that there was no increase in flood risk to properties beyond the proposed development site. It also states that the watercourse running along the eastern boundary of the site needs to be protected with a 3-metre-wide corridor (as a minimum) from the watercourse to the development. Note that the site plan indicates this. In these circumstances, the proposal is considered to meet the objectives of TAN 15 in terms of surface water flooding.
- 5.31 In accordance with the requirements of paragraph 7.6 of Technical Advice Note 15: Development, Flooding and Coastal Erosion, a Drainage Strategy must be submitted as part of an application to outline the drainage scheme for surface water from the site, unless a separate application has been made to the approval body, namely Cyngor Gwynedd's Land Drainage Unit. In this case, the Land Drainage Unit has confirmed that an application has been received and that there are only a few minor points that need to be addressed before it can issue a certificate of approval. To this end it does not object to the application and the proposal is therefore deemed to be in compliance with the relevant part of TAN 15.

Education Matters

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5.32 The Department for Education was consulted on the proposal and confirmation was received that there is available capacity at Llanrug Primary School and Brynrefail High School. Specifically:

- Ysgol Llanrug: Capacity 307 – Current total – 235 (September 25) – Projected numbers – September 2026 – 225; September 2027 – 220; September 2028 - 226.
- Ysgol Uwchradd Brynrefail: Capacity 790 – Current total – 761 (September 25) – Projected numbers – September 2026- 740; September 2027 – 734; September 2028 - 717.

5.33 The estimated number of children that would result from the development is shown below:

- Projected numbers of primary age children as a result of the development: $17 \times 0.4 = 6.8 = 7$ additional primary pupils
- Numbers of secondary age learners projected as a result of the development:
Secondary School years 7-11: $17 \times 0.29 = 4.93 = 5$ additional pupils (years 7-11)
Secondary School years 12 and 13: $17 \times 0.02 = 0.34 = 0$ additional pupils (years 12 and 13)

5.34 On the basis of this information and as there is existing capacity within the local schools, this proposal would not cause Schools to exceed their capacity and therefore it is not relevant to consider an educational contribution in this case for the additional pupils that would result from the proposed development.

Open Spaces and Play Areas

5.35 Policy ISA 5 states that new housing proposals for 10 or more dwellings, in areas where existing open spaces cannot meet the needs of the proposed housing development, are expected to provide suitable provision of open space. Paragraph 6.1.29 of the LDP states that in order to inform the open space requirements on future proposals, the Fields in Trust (FIT) benchmark standard of a minimum 2.4 hectares per 1,000 population should be used. This includes 1.6ha of outdoor sports facilities (of which 1.2ha are formal playing fields) and 0.8ha of children's play space (of which 0.25ha are equipped play areas). The estimate made indicates a lack of provision of children's playgrounds with equipment in this area.

5.36 No provision is proposed on site, but sections 5.65-5.72 of the Planning Statement explain why provision cannot be made on site. In this case, the restrictions of the site which include an existing public footpath and watercourse, the provision of an ecological corridor and the provision of SUDS mean that although there are informal open areas on the site, it is not possible to provide an open play area and equipment within the site.

5.37 ISA Policy 5 recognises that the inclusion of provision on sites would not be practical in all cases however, the applicant must provide a solid justification to prove that it is not possible to provide outdoor play areas as part of a new housing development. In such cases, the Authority will seek to arrange a planning obligation under Section 106 or a unilateral agreement to enable developers to make a contribution towards suitable off-site play areas instead of direct provision within the development site.

5.38 It is held that in a case such as this and as has already been agreed with similar developments, a financial contribution is intended to be secured through a 106 agreement or unilateral agreement thereby, ensuring that the proposal is acceptable in accordance with the relevant requirements of

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policy ISA 5. To this end, based on the need calculated below, a total contribution of £10,350.86 will be required,

Provision of open spaces from the new development:

- Outdoor Sports = 596.28m² x £11.69 = £6970.51
- Play Areas with Children's Equipment = 88.98m² x £37.99 = £3380.35

Language Matters

5.39 Criterion (2) of Policy PS 1 states that a Welsh Language Impact Assessment will be required for a proposed development on an unexpected windfall site for a large-scale housing development. The fact that this is an exception site outside the development boundary therefore means it is an unexpected windfall site. 'Large scale' as noted in the SPG 'Maintaining and Creating Distinctive and Sustainable Communities' is defined as five or more new housing units in Llanrug.

5.40 It is noted that a Welsh Language Impact Assessment has been submitted with the application. In its response to the consultation, the Language Unit confirmed that the linguistic assessment was comprehensive and had analysed the history of developments in neighbouring areas, as well as providing a linguistic analysis of the area. It outlines local demand, including Housing Options and Tai Teg Team statistics for the application area and surrounding communities. The information in the assessment supports the beneficial effect offered. It is noted that a condition for providing a Welsh name for the estate would be placed on any decision. Consequently, the proposal is not considered to be contrary to the material requirements of policy PS 1.

Response to the public consultation

5.41 It is acknowledged that objections have been received to this proposal and all relevant planning issues are considered to have received appropriate attention as part of the above assessment. A decision is made based on full consideration of all the material planning considerations and all the observations received during the public consultation and that no one was let down when considering this application.

6. Conclusions:

6.1 Having considered the above and all the relevant matters including the local and national policies and guidance, as well as all the observations received, it is believed that this proposal is acceptable and satisfies the requirements of the relevant policies as noted above.

7. Recommendation:

7.1 Approve subject to conditions and subject to a 106 agreement or unilateral agreement for securing open space contribution

1. Time
2. In accordance with the plans
3. Materials
4. Affordable housing condition
5. Highway conditions
6. Biodiversity conditions

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7. Landscaping condition
9. Removal of permitted development rights involving extensions and use
10. Drainage matters.
11. Building Control Plan
12. Protection of the public footpath.
13. Archaeological conditions

Notes:

Highways

Bat Licence

Natural Resources Wales

Welsh Water

Footpaths

SUDS

Major development

Land Drainage Unit