

**Anglesey & Gwynedd
Joint Local Development Plan**

Local Development Plan (LDP) Examination

HEARING STATEMENT

**Hearing Session 12
ALLOCATIONS AND ALTERNATIVE SITES
GWYNEDD - Llŷn**

Response by Mr Alex Badley (Reference 1027)

August 2016



Preamble

Asbri Planning Limited have been instructed by Mr Alex Badley to submit this Statement. Objections were submitted regarding the omission of land at Hen Dy Farm, Abersoch as a housing land allocation.

The site at Hen Dy Farm, Abersoch was promoted as a Candidate Site – SP 830, and subsequently through representations on the LDP Preferred Strategy and Deposit Plan. We are therefore disappointed that the site has not emerged as a housing allocation. We consider that its release for housing development should be made as it clearly meets the provisions of the Deposit Plan as a sustainable site in a Local Service Centre - Abersoch.

The Matters and Issues raised by the Inspector are addressed in turn below.

Hearing Session 12 - Matters and Issues Agenda

3. Key Issue:

- **Whether the identification of the alternative site in question is essential to the soundness of the LDP. The issues, benefits and disadvantages of those alternative sites whose promoters wish to be heard will be discussed at this session. It is intended that each site will be dealt with separately and there will be no need for other participants to attend apart from for the discussion on their own site.**

Insufficient provision is made in the Local Service Centre of Abersoch as there is limited scope within the existing settlement boundary to provide for local housing needs, including affordable housing. By not providing for necessary growth in such a sustainable settlement the Deposit Plan fails associated Tests of Soundness in not having regard to national policies, and the policies and allocations are not realistic and appropriate having considered the relevant alternatives and are not founded on a robust and credible evidence base. There is consequently a need for an appropriate release of development land in Abersoch rather than a total restriction of outward growth as is proposed.

The site in question represents a logical direction of growth for the settlement. Development at this location would complement the strong network of settlements which make the plan area more efficient in terms of access to jobs, affordable homes and services, including tourism and leisure.

The identification of the alternative site is therefore essential to the soundness of the LDP as Local Service Centres should accommodate a proportional degree of growth by specific LDP allocations rather than relying on windfall development within previously established settlement boundaries.

4. Matters to be addressed, where appropriate, for each site:

a. What is the name reference of the site?

Hen Dy Farm, Abersoch (Candidate Site – SP 830,)

b. What is the current status use of the site and what is the proposed use?

Countryside - Rough grazing land, contained by hedgerows. Proposed residential uses.

c. What is the size of the site and what scale numbers of units are proposed?

3.2 hectares. Approximately 90 dwellings.

d. Are there any significant obstacles to the development of the site within the Plan period?

None

e. What are the anticipated timescales for delivery?

5 years following the granting of planning permission.

f. Should the site be included within the settlement boundary and/or be allocated?

It should be specifically allocated for the uses proposed to provide certainty.

g. Is the site necessary to ensure that the LDP is sound?

Refer to comments above in relation to the need for certainty of necessary growth in Local Service Centres.

h. How would the alternative site contribute to the aims and strategic objectives of the Plan?

The Plan Strategy identifies a Settlement Hierarchy based on rankings set out in Topic Paper 5: Developing the Settlement Strategy. In this context the Strategy proposes:

- *An emphasis on developing the Sub Regional Centre and the Urban and Local Service Centres, where environmental, social and infrastructure constraints allow.*

The release of the site would involve a form of development which could be accommodated without undue encroachment into the wider landscape, and it would provide a range and choice of housing opportunities.

i. Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?

In the Council's assessment the emphasis seems to be on the northern site (proposed for tourism uses) as representing an encroachment into the open countryside and the wider AONB. This does not apply to the remainder of the site as it is partly enclosed by existing dwellings and tourism uses. In any event tourism uses on the northern site would largely retain its open nature. In the Deposit Plan representations the northern site from the Alternative Site submission.

Whilst tourism uses could be pursued on the northern site in the absence of a specific site allocation, it is related to the proposed housing as an improved access and car parking would be required via the housing site. Advice in Planning Policy Wales seeks to encourage mixed use allocations in order to achieve a more sustainable use of land.

As stated above, the assertion in the assessment that '*No allocation is required in the settlement as there is a sufficient land bank and windfall opportunities to meet the settlement's housing needs.*' is strongly disputed and is not supported by evidence that there is no need for proportionate development in a local service centre over the plan period.

j. Has the alternative allocation sought been considered in respect of the Sustainability Appraisal/Strategic Environmental Assessment? Would the change be likely to have significant effects that require re-assessment? If so, has such an assessment been carried out? What was the outcome of the process?

The site has been considered against the Plan's Sustainability Objectives, and an SA/SEA assessment was provided with the Deposit Plan representations. This showed that 2 ++ scores would result; 6 + scores, 2 +/- scores and 1 0 (neutral) score.

5. Any other matters

The site has been subject to various proposals in the recent past, including an outline planning application in March 2007 which was subject to a Full Assessment under the Environmental Impact Assessment (EIA) Regulations.

Proposals involved local needs housing, light industrial storage units for local business and ancillary development. The development was proposed to be of environment conscious design; using sustainable and ecological techniques to reduce impact. Buildings would be sited and oriented to optimise their solar aspect while forming wind sheltered microclimate to improve energy efficiency.

The character of the development would be formed by the natural materials, in keeping with the local vernacular, including local stone, slate, timber, clay. It was proposed that larger scale buildings could have grass roofs designed to minimise visual impact. The ecological techniques were intended to reduce consumption and also emissions, and include on site wastewater treatment. The proposals are also designed to increase the biodiversity on the site.

The proposals were supported by a raft of technical information which included the following:

- Consideration of alternatives
- Topographical Survey
- Design Statement
- Highways Analysis
- Landscape Impact Assessment
- Flora and Fauna Surveys
- Drainage Strategy
- Economic Assessment

The principle of development was not accepted by the Council. Subsequent reduced scale schemes were submitted as planning applications. These included:

- A mixed use development of 10 affordable dwellings, 10 holiday homes and 6 B1 employment units (CO9D/0102/39/AM) ;
- 6 affordable dwellings (CO9D/0446/39/AM);

Whilst proposals were either refused or subsequently withdrawn, the site has benefits over other sites promoted in Abersoch, in that it has been subject to detailed studies, which have established that there are no over-riding constraints to development, and that adequate mitigation can be achieved to compensate for any adverse impacts.

A disk with the above referred to information is available and is submitted for the Inspector's information. It is appreciated that extensive evidence is not required at this stage. However, it demonstrates that the site has been subject to a comprehensive range of detailed considerations, and is suitable to accommodate a range of potential uses which could include, housing, employment or tourism uses.