

## **Hearing Session 1**

# **PLAN PREPERATION, VISION, OBJECTIVES & SPATIAL STRATEGY**

**9.30 am, Tuesday 6 September 2016**

**Anglesey and Gwynedd Joint Local  
Development Plan**



**CYNHOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL**

This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to the Economy – Employment, Retail and Tourism in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

## Matters & Issues Agenda

### 1 Introduction

### 2 Procedural Matters

### 3 Has the Plan been prepared in accordance with the necessary procedural requirements?

- 3.1 **Response** - The Councils are satisfied that the Anglesey and Gwynedd Joint Local Development Plan (2011 – 2026) has been prepared in accordance with the necessary procedural requirements as set out in Sections 62 and 63 of the Planning and Compulsory Purchase Act 2004, as well as the requirements of the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.
- 3.2 The Councils have also complied with other statutory procedural requirements associated with preparing a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA), as set out in the individual reports (CDLL.007 – CDLL.008) and their addendums (DA.021 – DA.019).

### 3a Has the Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?

- 3.3 **Response** - The Delivery Agreement (DA), including the Community Involvement Scheme (CIS), was originally approved by the Isle of Anglesey County Council and Gwynedd Council in September and October 2011, respectively. It was agreed with the Welsh Government in November 2011. Since then the Plan preparation timetable has been amended in 2013, 2014 and finally in 2016. The amendments to the timetable have been incorporated into revised DAs, which have been agreed with the Welsh Government. The final DA records the amendments included in the various iterations of the DA (CDLL.021 & CDLL.022)
- 3.4 Full details of the stages undertaken and the engagement and consultation methods applied are set out in the Consultation Report (March 2016) (CDLL.020), which includes the Tests of Soundness Self Assessments undertaken at Deposit stage and Submission stage (Appendix 1 to CDLL.020).
- 3.5 Whilst every effort was made to fully comply with content and the objectives of the CIS, it was necessary to deviate slightly from it. Specifically:
- Citizen's Panel – originally the Councils intended to engage with the Panel as a means to investigate the opinion of a cross-section of the population of Anglesey and Gwynedd. The Panels could form a useful 'sounding board'. However, it wasn't possible to take advantage of Gwynedd Council's Citizen Panel since the corporate protocol for consulting the group doesn't permit it. An Anglesey Citizen Panel wasn't established in time. This deviation from the Community Involvement Scheme is recorded in the Consultation Report (CDLL.020)
- 3.6 Members of the Citizen Panel are inevitably members of the public, who would have been informed via Public Notices of the Plan preparation process. The Councils consider that the Anglesey and Gwynedd Joint Local Development Plan (the Plan)

has been prepared in a manner that doesn't prejudice any person's opportunity to be involved in the Plan's preparation.

**3b. Has the Plan been subject to a robust Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment/Appropriate Assessment?**

Sustainability Appraisal, Strategic Environmental Assessment

- 3.7 **Response** - Yes, in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 and the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, the Plan has been subject to a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). The SA/ SEA also considered impacts on health, equalities and the Welsh language as part of a comprehensive coordinated appraisal. The SA/ SEA were informed by a separate Health Impact Assessment, an Equalities Impact Assessment and a Welsh Language Impact Assessment. The term Sustainability Appraisal (SA) in the rest of this statement refers to the joint appraisal and should therefore be taken to include SEA.
- 3.8 The SA work has been undertaken in-house and by Enfusion Ltd., who were employed in order to increase the capacity of the Anglesey and Gwynedd Joint Planning Policy Unit and to quality assure the work undertaken (process and content). The consultancy also provided advice at key stages including guidance on how to ensure the Councils' complied with the Strategic Environmental Assessment Regulations.
- 3.9 Full details of the SA stages, including engagement and consultation work, and the outcomes are set out in the Sustainability Appraisal Report (March 2016) (CDLL.007) and the Sustainability Appraisal Report Addendum (July 2016) (DA.021). The work is summarised below:
- Stage 1: SA Scoping Report - the SA Scoping Document (<https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Appraisals-and-Assessments/Scoping-Report.pdf>) established the sustainability baseline of the County Borough, contained a review of other relevant plans and programmes that may influence the SA and Joint LDP, presented the SA Objectives and outlined the proposed methodology for the SA. Following consultation, amendments were made and incorporated into the SA and a revised SA Scoping Report was published as an attachment to the SA Interim Report in May 2013 (<https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Appraisals-and-Assessments/SA-and-SEA.pdf> )
  - Stage 2: SA Interim Report (Preferred Strategy) - the Stage 2: SA Interim Report was published for consultation as part of the package of documents alongside the Preferred Strategy in May 2013. The SA Interim Report contained detailed assessments of the Preferred Strategy, including the options for the level of growth, the Plan's vision, objectives and strategic policies.
  - Stage 3: SA of the Deposit Joint LDP - the Stage 3: SA of the Deposit Plan Report (CDLL.007) – the SA Report was published for consultation as part of the package of documents alongside the Deposit Plan in February 2015. The SA Report contained detailed assessments of the Plan's Strategy, the Plan's vision,

objectives, development allocations, the range of overarching strategic and detailed topic based policies and also provided a summary of recommendations and mitigation measures.

- Stage 4: SA of Focus Changes to the Deposit Joint LDP – this was included Chapter 6 of the SA Report referred to in Stage 3 above. Following a preliminary enquiry from the Inspector (DA.002) an Addendum to the SA Report was produced in July 2016 (DA.021), which includes clarification of the assessment and editorial amendments to Chapter 6.
- Stage 5: SA of emerging Matters Arising Changes, including additional amendments to text or policies in the Plan and additions to address the need for Gypsy and Traveller sites and opportunities for solar farms. This is set out in the Addendum referred to in Stage 4 above.

### Habitats Regulations Assessment/Appropriate Assessment

- 3.10 The Councils also confirm that a Habitats Regulation Assessment in accordance with the requirements of Articles 6(3) and 6(4) of the Habitats Directive has been undertaken on the Joint LDP. The work was undertaken by Enfusion Ltd., who was employed to increase the capacity of the Anglesey and Gwynedd Joint Planning Policy Unit. The results can be found in the following document, which were submitted to the Welsh Government: Habitat Regulations Assessment (CDLL.008) The assessment has concluded that the Plan, including Focus Changes, is unlikely to have a significant effect on European sites. These findings were subject to consultation comments and advice from Natural Resources Wales and wider stakeholders. An addendum to the Habitat Regulations Assessment records the findings in relation to the changes identified during the Examination process (DA.019).

<b>3c. Has the Plan been informed by a robust consideration of reasonable alternatives?</b>
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- 3.11 **Response** - Yes. In order to inform the Preferred Strategy, the Councils published a “Developing the vision, key objectives and strategic options” Paper (CDLL.001) in November 2011 as a basis for engagement with the public and a range of other stakeholders identified in the Delivery Agreement. The content of the booklet was informed by an initial in-house analysis of evidence. The engagement period sought views and gauged the preferences about the Plan’s vision, objectives and a range of growth and spatial options. The strategy options considered were as follows:

#### Growth Options

- Option T1 - ‘Sub regional apportionment’
- Option T2 – ‘Population trend growth’
- Option T3 – House building trend – 10 year period
- Option T4 – ‘Economic base growth only’
- No growth

#### Spatial Options

- Option D1 – Focus on Bangor and the Primary Key Settlements
- Option D2 - Focus on Bangor, Primary Key Settlements and the Primary and Secondary Focus Areas and their catchment areas

Option D3 – Proportionate distribution to Urban and Rural areas  
Option D3a – Focus on rural areas  
Option D4 – Focus on large mixed use developments

- 3.12 Details of the Options are included in Topic Paper 4 (PT.008). Full details of the Sustainability Appraisal of the Options are included in the Sustainability Appraisal Report (March 2016) (CDLL.007). The Welsh Language Impact Assessment Report records the results of an assessment of the Options in terms of the well-being of the Welsh language (CDLL.011). The results of the engagement exercise are outlined in the Consultation Report – Section 5 and Appendix 8 (CDLL.020). The results fed directly into the preparation of the Preferred Strategy for the Plan area (CDLL.003) and subsequently the Deposit Plan (CDLL.004)
- 3.13 Following consultation about the Preferred Strategy and the release of the 2011-based Census results the Growth Options were revisited and refined/ refreshed in order to ensure that the Deposit Plan was based on a coherent and deliverable strategy. Such a strategy will facilitate new development that will address the Plan’s vision and objectives. The Sustainability Appraisal Report (March 2016) (CDLL.007) records the assessment of the refined/ refreshed Strategy.
- 3.14 In addition, as part of the early evidence gathering stages the Councils invited the public and other interested parties to submit Candidate Sites to provide an indication of sites available for development or conversely an indication of sites considered to warrant protection from development. Details of the Candidate Sites submitted at this evidence gathering stage are included in the Candidate Site Register (CDLL.002). The results of the assessment of the Candidate Sites are included in Topic Paper 1A and 1B (PT.002 & PT.003).

**4 Is the Plan’s Vision sufficiently aspirational and locally specific to form the basis for planning to 2026?**

- 4.1 **Response** - Yes. The Plan’s vision, as amended by Focus Change NF5, is considered to be aspirational and locally specific. It is considered to communicate the sort of place the Plan area aspires to be. It, and the objectives, provides an overarching context to the Plan and shows how economic, social and environmental considerations can be balanced to facilitate sustainable development.
- 4.2 It takes full account of the strategic and locally distinctive issues relevant to the Plan area. It was developed and shaped through various sources including the Key Stakeholder Group, engagement with the public and other stakeholders, evidence gathering (including SA/SEA Scoping). Full regard has been given to the content of the Single Integrated Plans in place at the Plan preparation stage, as well as the Anglesey Energy Island Programme. An overview of the considerations is provided in the “Developing the vision, key objectives and strategic options” Paper (CDLL.001) and an overview of representations made during the engagement period about the direction of travel is included in the Consultation Report (CDLL.020)

**5 Are the Plan’s objectives SMART and capable of delivering on the identified Vision?**

- 5.1 **Response** - Yes. The Plan objectives set out in more detail on how the Vision can be addressed through the planning system. They respond to the economic, social and environmental elements of the Vision and have informed the development of strategic

and detailed policies in the Plan. As a result of representations at the Preferred Strategy stage the objectives were refined and grouped under 5 themes, which are considered to encapsulate the main elements of the Vision. It is considered that the objectives are SMART because:

- They relate to specific issues that are relevant to the Plan area, setting out how the Plan should address them;
- Each theme includes outputs to assist in measuring the delivery of the output. Additionally the Plan's policies flow from the objectives and the monitoring framework in the Plan, set out in Chapter 8, includes indicators and targets to measure delivery;
- The objectives are considered to be achievable during the plan period through the implementation of policies and proposals. The aforementioned monitoring framework will record whether the objectives are achieved;
- The objectives are considered to be realistic;
- The monitoring framework includes time related targets and thresholds.

<b>6</b>	<b>Is the spatial strategy consistent/compatible with:</b>
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<b>6a.</b>	<b>the Wales Spatial Plan?</b>
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6.1 **Response** - Yes. The spatial strategy of the Plan is consistent/ compatible with the Wales Spatial Plan Update 2008 (WSP). To achieve this consistency/ compatibility the WSP was utilised to provide some of the spatial context for the options considered during the pre-Preferred Strategy stage as well as the development of the Plan's Settlement Hierarchy. This is recorded in Developing the vision, key objectives and strategic options (November 2011) (CDLL.001) and Topic Paper 5A Developing the Settlement Hierarchy (Chapter 3) (PT.011), which also records the results of the sustainability appraisal of all the settlements.

6.2 In terms of the WSP coverage the Plan area is split between two spatial plan areas namely: North West Wales Eryri and Mon and Central Wales, each of which include variations in approach in defining their respective hierarchies. The Plan has closely aligned the higher levels of its settlement hierarchy with that of the WSP. Based on sustainability and an analysis of services and facilities more Centres are included at the lower level settlements than the WSP (see Table below). None of the higher or lower level settlements identified in the WSP are excluded from the Plan's Settlement Hierarchy. The Councils consider that the robust methodology that sits behind the Settlement Hierarchy justifies the minor deviations. Despite the additions the Councils consider that the Plan is consistent and compatible with the WSP and its themes.

Table 1: Comparison between Wales Spatial Plan and the Deposit Plan

<b>Categorisation in Wales Spatial Plan</b>	<b>Categorisation in Deposit Plan's Settlement Hierarchy</b>
Key settlement of national significant: Bangor	Sub-regional centre: Bangor
Primary Key Settlement: Caernarfon, Porthmadog, Pwllheli, Llangefni, Holyhead	Urban Service Centres: Caernarfon, Porthmadog, Pwllheli, Llangefni, Holyhead, Amlwch, Blaenau Ffestiniog
Cross-boundary settlement: Penrhyndeudraeth, Blaenau Ffestiniog	These settlements are included in the Local Service Centre and the Urban Service Centre, respectively.
Key settlement: Bethesda, Llanberis, Nefyn, Tywyn, Abermaw, Beaumaris, Amlwch	Local Service Centres: Llanberis, Nefyn, Tywyn, Abermaw, Beaumaris, Abersoch, Criccieth, Llanrug, Benllech, Bodedern, Cemaes, Gaerwen, Llanfairpwll, Porthaethwy, Pentraeth, Rhosneigr, Y Fali.

**6b. regional plans and strategies?**

6.3 **Response** - Yes. In preparing the Plan the Councils have considered a range of regional plans, policies and guidance. Chapter 3 of the Plan provides a summary of individual documents and an overview of the considerations for the emerging Plan. These include the former regional transport plans (now known as joint local transport plans); the North West Wales Gypsy and Traveller Accommodation Needs Assessment. Others referred to include the Regional Waste Plan and the Regional Technical Statement (Minerals).

**6c. the plans/strategies of neighbouring authorities?**

6.4 **Response** - Yes. This is a joint local development plan and therefore represents close collaboration between the Isle of Anglesey County Council and Gwynedd Council. The Snowdonia National Park Authority occupies part of Gwynedd in land terms, however, that area is covered by its respective LDP. The Gwynedd Local Planning Authority adjoins 4 other local planning authority areas: Conwy County Borough Council, Denbighshire County Council, Powys County Council and Ceredigion County Council. The Councils have had regular contact with neighbouring authorities both individually (particularly Snowdonia National Park Authority) and collectively at regional level (through the North Wales Planning Policy Officers Group).

6.5 Where relevant the Councils have engaged with neighbouring authorities to ensure cross boundary compatibility and/ or continuity. This engagement has included joint studies, such as the Renewable Energy Capacity Study, Gypsy and Travellers Accommodation Needs Assessment, Landscape Sensitivity and Capacity Study. Some settlements are split between the Joint LDP and the Eryri LDP, e.g. Nantlle,



Llanberis. Discussions at the Eryri pre-Deposit stage ensured a consistent approach as far as is reasonably possible, which is replicated in the Joint LDP. Therefore, it is considered that constructive discussions between Councils/ Authorities and sharing of information and experience has minimised the risk of conflicting policies and ensured an appropriate level of integration.

- 6.6 In addition to the above, neighbouring local authorities have been regularly consulted at all stages in the Plan preparation process, which provided a formal opportunity to comment on the emerging Plan and influence its development.

**6d. Does the Plan reflect the strategies and proposals of infrastructure providers?**

- 6.7 Yes. The Plan preparation involved identifying existing and proposed infrastructure provision in the Plan area. Information has been obtained from the Councils' Services, infrastructure providers and other stakeholders. This information is summarised in the Community Infrastructure – baseline information (2015) (PT.024).

- 6.8 The Councils have also engaged specifically with Dwr Cymru Welsh Water (DCWW), who advised that their Capital Investment Programme is undertaken through a rolling Asset Management Programme. The AMP seeks to fund large scale utility (water/ sewerage/ waste water treatment works) infrastructure works. Currently DCWW are implementing AMP 6, which runs from 1/4/2015 to 31/3/2020.

- 6.9 In considering the requirements of their AMPs, DCWW requires some certainty in terms of growth areas and site development proposals. Information included in development plans help guide where investment is required, subject to regulatory approval and affordability. An adopted Plan therefore provides a degree of certainty that allocations are likely to be delivered as the Industry Regulator Ofwat will not provide funding for unconfirmed growth. A Statement of Common Ground between DCWW and the Councils, included in the Site Deliverability Report (DA.015), explains that the different time periods covered by the AMPs and the Plan mean that the delivery of some sites or when all the units on specific can be delivered needs consideration, and that any capacity issues will form part of a future submission for funding under AMP 7. Nonetheless DCWW and the Councils do not consider that this means that development will necessarily be prevented. Alternative mechanisms may contribute to the delivery of these sites.

- 6.10 Both Councils are at different stages in reviewing their educational provision in order to ensure that schools are capable of delivering an educational service of the highest standards. The changes undertaken or proposed to date involve the building of new schools, the amalgamation and closure of some schools and some different ways of working. Significant progress has already taken place with some further changes being explored. As decisions about changes still need to be made by each Council, the Plan includes a criteria based policy (Policy ISA 2) in order to guide any new provision of new community facilities, which includes schools, to the most sustainable settlements unless evidence justifies an alternative location. The Plan also seeks to align new development with the level of existing and proposed infrastructure, including educational facilities. It may be possible that mitigation may be sought from some residential developments, where development places a strain on a school to accommodate additional demand. The Councils encourage early engagement to agree on the need for and the scale and nature of the contributions at the time of the planning application. A proposed Supplementary Planning Guidance will provide guidance on the approach.

- 6.11 The Councils therefore consider that the Plan has given regard to the strategies and proposals of infrastructure providers.

<b>7 Is the approach to site selection sufficiently clear and transparent and is it founded on a robust evidence base?</b>
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- 7.1 **Response** - Yes. The sites selected/ allocated within the Deposit Plan, as amended by Focus Changes, have been subject to robust and comprehensive assessments. In preparing the Plan, the Councils have taken a significant number of sites into consideration, i.e. sites submitted as Candidate Sites, sites allocated in existing plans that currently remain undeveloped, and sites suggested in inter Service discussions. Whilst the assessment was not designed to produce detailed technical information on a site by site basis, the process did provide a comprehensive overview of the development potential of sites and was based on the best available information at the time of Plan preparation.
- 7.2 The selection of housing sites and the justification for the decisions taken between the competing alternatives is set out in Topic Paper 1 and Topic Paper 1A the Candidate Site Assessment Report (PT.001 and PT002). The assessment enabled the Councils to determine which sites are capable of development and can contribute to the delivery of the Strategy, i.e. their 'suitability' and 'deliverability' over the Plan period. The assessment process included extensive consultation with internal Council departments and statutory consultees to identify any site constraints. An overview of the information is provided against each site in Topic Paper 1A and 1B (PT.002 and PT.003).
- 7.3 In order to assist the Councils to understand employment land requirements across the Plan area, and to ascertain a further understanding of potential need, the Council commissioned an Employment Land Study (DC.004). The Study involved a comprehensive review of current employment sites and premises with the results providing a basis upon which the future employment land supply requirements would be considered and was a key informant of strategic and detailed policies in the Plan.
- 7.4 The selection process of Gypsy and Traveller sites and the justification for the decisions taken between the alternatives is set out in Topic Papers 18, 18A and 18B (PT.030, PT.031 & DA.022), which, where appropriate, provide links to relevant Committee reports that record the results of public consultation about options considered.
- 7.5 The suitability of sites was also considered during the SA/ SEA of the Plan and is recorded in the Sustainability Appraisal Report (CDLL.007) and the Sustainability Appraisal Report Addendum (DA.021)
- 7.6 The Councils therefore consider that the site selection process as summarised above is a logical and robust mechanism for identifying suitable development sites and that the process is sufficiently clear and transparent and founded on a robust evidence base.

**8 Does the Spatial Strategy, including the Settlement Hierarchy, represent an appropriate strategy for delivering growth over the Plan period?**

**8a. Does the Plan's Spatial Strategy represent a sustainable approach to planning, including in terms of transportation, over the Plan period? Would the Plan's Strategy deliver the identified Vision and Objectives?**

8.1 **Response** - Yes. The Councils consider that the identification of a sustainable settlement hierarchy ensures that development is distributed in a sustainable manner. There is no specific national planning guidance on how a settlement hierarchy should be defined, however, Planning Policy Wales at paragraph 9.2.5 does provide some key issues that need to be addressed, i.e. it suggests that the hierarchy should establish a spatial pattern of housing development balancing social, economic and environmental needs. The identification of the Plan's hierarchy reflected and promoted sustainability by seeking to improve accessibility to essential services and facilities, and as consequence reduce the need to travel. It seeks to increase social inclusion achieving viable, self supporting settlements and sustainable communities. Topic Paper 5A Developing the Settlement Hierarchy (PT.012) records the sustainability credentials of individual settlements, their size, population, location, the availability of services and facilities as well as their accessibility. In so doing, a methodology aimed at achieving a balanced framework of settlements which reflects the level of services and facilities etc., available was used.

8.2 The majority of housing growth (55%) is directed to the Sub-Regional Centre and the Urban Service Centres with an additional 20% directed to Local Service Centres, in line with national planning policy. However, the Council considers that the social element of sustainability – supporting cohesive and vibrant local communities, providing housing to meet identified needs and maintaining accessible local services - constitutes an integral component and has particular resonance for rural communities in the Plan area as a predominantly rural authority, should enable minor proportion of overall housing growth to be directed towards the smaller rural settlements to support social sustainability objectives. Therefore it directs a managed level of growth to various Villages and Clusters in recognition of their role in a network of sustainable communities. The Settlement Hierarchy promotes sustainable communities where new development is located close to services and facilities with good public transport links. By locating housing, jobs and services in close proximity to one another the need to travel will be reduced and existing communities will be supported. The Settlement Hierarchy promotes the distribution of development in an accessible and sustainable manner that reflects the contrasting spatial characteristics of the Plan area.

8.3 The Settlement Hierarchy is considered to be central to achieving the Plan's vision, which in essence seeks to strengthen existing communities, and to achieving the Plan's objectives, which are set out under five themes: supporting and creating safe, healthy, distinctive and vibrant communities; sustainable living; supporting growth and regeneration that will transform the local economy; providing everyone with access to a home appropriate to their needs; and protecting and enhancing the natural and built environment.

8.4 The Plan provides for a suitable mix of housing (both open and local market and affordable housing) distributed in a manner consistent with the Plan's strategy. It supports health and wellbeing through its sustainable settlement framework and the provision made for the retention and expansion of community facilities. It promotes

accessibility with the potential to reduce poverty and social exclusion. The Plan, in facilitating investment, identifies a range and choice of employment sites across the Hierarchy with the principle focus on the Centres. In directing such growth biodiversity, environmental issues and service constraints have been considerations as has accessibility and transport. The social, linguistic and cultural heritage is recognised with provision made through a balanced level of growth in appropriate locations and policies which allow for their consideration.

- 8.5 Paragraph 6.10 of the Plan sets out the spatial strategy for development across the Plan Area. Policy PS13 sets out the quantum of housing development the Councils consider is needed to meet housing and employment needs (projected growth), whilst Policy PS 15, supported by Policies TAI 14 – TAI 18, set out where this growth is to be directed (settlement hierarchy) and scale of development apportioned to individual settlements (distribution of growth).

**8b. How has the Spatial Strategy been informed by the findings of local housing market assessments?**

- 8.6 **Response** – Both Councils updated their individual Local Housing Market Assessments (LHMA) in 2013 (DC.025 – Anglesey LHMA, and DC.026 – Gwynedd), replacing the North West Wales LHMA baseline report, which was published in November 2008. The Anglesey LHMA was undertaken in accordance with Welsh Government’s “Local Housing Market Assessment Guide of March 2006”. Gwynedd Council also applied the 2006 guidance and a later guidance issued by Welsh Government in 2012 (“Getting Started With Your Local Housing Market Assessment”) to give an overview of housing matters in Gwynedd.

- 8.7 Both the Anglesey LHMA (DC.025) and Gwynedd LHMA (DC.026) identified a significant level of affordable need within the Plan area: 635 in Anglesey and 709 in Gwynedd. This of course provides a snapshot at that moment in time, which is a factor acknowledged in paragraph 1.14 of the Local Housing Market Assessment Guide (March 2006) (Welsh Assembly Government): “It is accepted that housing assessments are essentially a snapshot of the position at a particular time...”.

- 8.8 The Anglesey LHMA identified a need for an estimated 635 affordable housing units per year in Anglesey.

- 8.9 The Gwynedd LHMA identified an annual housing need figure for 2013 – 2018 of 709 housing units. The study uses the Housing Market Areas identified in the former North West Wales LHMA referred to in paragraph 8.6 above to apportion the need based on the 2012 population figures:

LHMA 03 - Menai (Gwynedd)	171
LHMA 04 - Caernarfon	187
LHMA 05 - Llŷn Peninsula	98
LHMA 06 - Porthmadog	122
LHMA 07 - South Coastal Gwynedd	66
LHMA 08 - Machynlleth	15
LHMA 09 - Bala	49

- 8.10 Topic Paper 17A Local Market Housing also provides an insight into affordability issues in the Plan area. The table under paragraph 10.9, looks at the percentage of households that have an income below 1/3.5 x lower quartile house price. 81 out of

the 100 wards within the Plan area have over 50% of their households priced out of the market i.e. household income below 1/3.5 of the lower quartile house price in the same ward. It should be acknowledged that this is a worst case scenario and does not take into account any savings or other assets households may have to assist in purchasing properties. Therefore, it shouldn't be used to determine the overall need. However it does show the high level of variation between incomes and house prices across the Plan area and the need for affordable housing.

- 8.11 Explanatory Note – Facilitating Affordable Housing (July 2016) (DA.014b) draws attention to the Tai Teg Register and Housing Waiting Lists as means of drawing contemporary information about need.
- 8.12 The evidence suggests that there is a need for affordable housing across the Plan area. The Plan's Spatial Strategy distributes housing growth proportionately across the Plan area in order to meet the needs identified and to support social sustainability of settlements identified in the Settlement Strategy. The Plan's housing policies flow from the Strategy, facilitating 100% affordable housing on exception sites (which can be suitable sites adjacent to any development boundary) and in Clusters.

<b>8c. Is the level of growth within the lower tier settlements (villages and clusters) justified?</b>
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- 8.13 **Response** - The Plan identifies a Settlement Hierarchy in order to provide a balanced approach to managing growth, directing development to a network of settlements reflecting the attributes within the communities and their ability to accommodate growth. The Councils have assessed the role and function of settlements, remembering that the area is a predominantly rural one that is characterised by a range of different types of settlements. The classification of settlements is based on the following six-tier hierarchy:
- Sub-regional Centre
  - Urban Service Centres
  - Local Service Centres
  - Service Villages
  - Local/ Coastal/ Rural Villages
  - Clusters
- 8.14 Topic Paper 5A Developing the Settlement Strategy (PT.012) records the methodology and the assessment undertaken to identify the hierarchy and the classification of individual settlements.
- 8.15 As the potential land requirement emerged, the Councils identified and assessed a range of strategy options as set out in response to question 3c above, and in Topic Paper 4 (PT.008) and in the Sustainability Appraisal of the Plan (CDLL.007). The adopted strategy is considered to bring benefits to both the urban areas as well as the more rural areas within the Plan area.
- 8.16 The majority of growth (75%) is directed to the Sub-regional, Urban Service and Local Service Centres, which is in line with national planning policy. The Councils consider that some continued growth in settlements outside the Service Centres is required to help maintain vibrant local communities and the Welsh language. As referred to in response to question 3a the Strategy also considers and gives

appropriate weight to the social element of sustainability. For this reason 25% of the housing growth is directed to Service Villages, other Villages and Clusters.

- 8.17 The Service Villages represent the top tier of this part of the Settlement Hierarchy. They are considered to provide a sufficient level of access to services and facilities within their boundaries to accommodate a proportionate level of growth to sustain rural communities by meeting local housing need on allocated or windfall sites and providing opportunities for other development, e.g. local employment. From an economic perspective rural businesses make a significant contribution to the Plan area's economy. On this basis, the Councils consider that the spatial strategy and settlement hierarchy should support the prosperity of the rural economy by providing appropriate employment opportunity in the rural settlements, particularly the Service Villages. As described above, Topic Paper 5A Developing the Settlement Strategy (PT.012) records the sustainability appraisal of the individual settlements. The Plan allocates land for housing. 22% of the level of growth directed to Villages and Clusters is directed to the 11 number of Service Villages.
- 8.18 The Settlement Hierarchy then cascades down to include smaller settlements described as either Rural/ Local / Coastal Villages. Topic Paper 5A Developing the Settlement Strategy (PT.012) describes the subtle differences between these settlements. As described above the Plan is aiming to maintain or create sustainable communities, and maintain the vitality of the Welsh language. Therefore, the Plan seeks to facilitate housing development that enables existing communities to meet some of their own needs. The amount of development is limited and is consistent with the settlements' facilities and accessibility. No housing allocations are included in these settlements. The extent of the development boundaries mean that opportunities for large estate type developments is naturally limited. Housing opportunity is limited to infill sites and sites that potentially round off existing development. The 76 Rural/ Local / Coastal Villages account for 53.5% of the level of growth directed to the Villages and Clusters, which equates to 13.4% of the overall level of growth. The Plan will be supported by a monitoring framework to track delivery in terms of level and type of housing units.
- 8.19 Planning Policy Wales (paragraph 9.3.2) states 'Sensitive infilling of small gaps within small groups of houses, or minor extensions to groups, in particular for affordable housing to meet local need, may be acceptable, though much will depend upon the character of the surroundings and the number of such groups in the area'.
- 8.20 On this basis, the Plan identifies 'Clusters'. Clusters are existing locations that already have a comparatively substantial 'settlement' character, particularly in relation to housing. The identification of Clusters has therefore been based on the presence of a built form at the start of the Plan period, i.e. they had at least 10 housing units that were immediately adjacent to each other in one group, or on some occasions 2 or 3 groups. They vary considerably in size. Some are coherent collections of 10 or slightly more residential units only whereas others formed by large groups of coherent residential units. All have a function at some level as a community and all have a reasonable access via public transport to a high order settlement.
- 8.21 Policy TAI 18 states that new residential development will be limited to a maximum of 2 units per Cluster during the Plan period. Development boundaries can provide more certainty on locations likely to be acceptable for housing. Development boundaries are also useful to identify opportunities for 'rural exception' affordable housing. Development boundaries however can suggest that all land within the

boundaries is suitable for development, which might not always be the case. On the basis that only a very limited amount of development is being directed to each Cluster, Policy TAI 18, which is a criteria based policy, is included in the Plan. The criteria reflect the material planning considerations that the Councils would need to consider, including safeguarding the countryside and the character of the settlement. Nonetheless, in order to be compatible with national planning policy and guidance, provide an element of certainty, and to appropriately manage new development proposals the extent of the Clusters listed in Policy TAI 18 is shown by colouring buildings on the Proposals Map. This will facilitate new development opportunities on a limited number of small infill and rounding off plots near existing buildings. This approach was included in the adopted Gwynedd Unitary Development Plan and in the Isle of Anglesey County Council's adopted Interim Planning Policy – Rural Clusters.

- 8.22 The amount and type of new residential units in the Clusters will be strictly controlled to provide local need affordable housing only. In line with Policy PS 15 and Policy TAI 18 just under 3% of the Plan's overall housing growth is directed to the Clusters. The Councils therefore consider that Policy TAI 18 is sufficiently detailed to manage development proposals in Clusters and that this approach is consistent with the requirements of national planning policy.
- 8.23 The scale and type of development directed to individual settlements is considered to be proportionate to the role and function of settlements. It assists in delivering the overall vision and objectives set out in the Plan. It should be noted that the plan making process has been consistent throughout in terms of acknowledging the role and function of settlements. The Councils consider the approach to be robust, proportionate, appropriate and deliverable within the existing social and economic context of the area.

**8d. Does the Spatial Strategy effectively link employment and residential growth?**

- 8.24 **Response** - Yes. The Spatial Strategy directs the majority of growth to the Centres and to a lesser degree to the Service Villages, which are considered to be the more sustainable settlements. The Centres and Service Villages are accessible to other Villages and Clusters, to which more limited development is directed. The Centres and Service Villages are home to the majority of current and allocated employment sites and other key community services and facilities. The following table illustrates the scale of housing and employment growth provided for in the Plan:

Category	Housing units (indicative supply target) Policy TAI 14 – TAI 18	Employment land (ha) Policy CYF 1 (total allocated and safeguarded land)
Sub-regional and Service Centres	4,399	404.6
Local Service Centres	1,580	137.1
Service Villages	440	4.5
Rural/ Coastal/ Local Villages	1,062	6.6

Clusters	224	-
Countryside	250	25.4

8.25 The Councils therefore consider that the Spatial Strategy effectively link employment and residential growth.

**8e. Does the Strategy maximise the use of previously developed land and adopt the sequential approach to the release of land as set out in Planning Policy Wales?**

8.26 **Response** - Yes, in line with Planning Policy Wales the Councils consider the Plan maximises opportunities to develop suitable previously developed land in preference wherever possible to greenfield sites. The Councils considered paragraphs 9.2.8 and 9.2.9 of Planning Policy Wales, which led them to give priority to the identification of suitable and developable sites for allocation within Centres and Service Villages. However, it should be noted that as a primarily rural area characterised by a large number of relatively small settlements, the availability of brownfield sites within the settlements is limited and is insufficient to address the requirement for new homes in the Plan area. The Councils undertook an Urban Capacity Study (PT.006) of the various Centres identified in the Settlement Hierarchy. This provided a comprehensive and realistic assessment of potential brownfield opportunities (sites and buildings) within the Centres, which are either currently available, or may become available during the Plan period up to 2026. This enabled a calculation of the likely scale of additional land that would be required. The size of the gap between the new dwelling requirement less the supply of new housing units between 2011 – 2013 and the number that is identified as achievable in the Urban Capacity Study led to the identification of allocated sites.

8.27 This approach ensures that opportunities to develop previously developed land that align with the Plan’s Spatial Strategy and Settlement Hierarchy were maximised.

**8f. Is the Plan’s Spatial Strategy and policy framework consistent with national policy relating to Flood Risk?**

8.28 **Response** - Yes, the Councils consider the strategic approach to flood risk, which generates the evidence to support the Plan is in line with national planning policy, Planning Policy Wales (PPW) and Technical Advice Note 15 (TAN15): Development and Flood Risk for the reasons set out below. Natural Resources Wales raised questions on the suitability of a housing allocation in Bangor and safeguarded employment sites in Penrhyndeudraeth, Porthmadog and Pwllheli. Individual objectors have challenged the Plan’s approach to restrict new residential development in Porthmadog, which is based on the lack of land suitable for housing and free from the risk of flooding. The Councils have undertaken additional work in relation to the housing allocation (as described below) and are minded to resolve the matters relating to employment sites at the Development Management level and via a suggested Matters Arising Change (as described below).

8.29 National guidance, contained in PPW highlights the need to reduce flood risk by avoidance of development within high flood risk areas and requires Local Planning Authorities to consider the catchment as a whole and take a strategic approach to flood risk. Furthermore, TAN15: Development and Flood Risk seeks to guide



planning decisions so that new development is directed away from areas that are considered to be at high risk of flooding. Where development has to be considered within a high risk area, TAN15 outlines justification tests in order to guide decisions regarding whether a specific development may proceed. TAN15 also states that further development in such areas, whilst possibly benefitting from some form of protection, will not be free from risk and could in some cases exacerbate the consequences of a flood event on existing development and therefore a balanced approach is required.

- 8.30 In order to ensure such a risk based approach to the development of the Plan policies and proposals the Councils undertook an in house Level 1 Strategic Flood Consequence Assessment (SFCA) for the Plan area. NRW was consulted on the Level 1 SFCA. The SFCA forms part of the evidence base for the Plan (PT.015 – PT.017). The SFCA encompasses a broad level assessment and does not remove the requirement for more detailed site-specific assessments which will follow the adoption of the Plan. The overarching aim of the SFCA was to provide sufficient data and information to enable the Councils to apply a sequential approach to the allocation of sites, promoting Welsh Government Development Advice Map (DAM) Zones A and B before Zone C in line with TAN15. The SFCA considered both fluvial and tidal influences on flood risk within the Plan area.
- 8.31 A broad-level assessment using existing information was used for the study. This approach is in accordance with legacy body Environment Agency Wales Operational instruction 303.09 “*Flood Risk Management: Strategic Flood Consequence Assessments for Wales*”, which adopts a three staged approach. Stage 1 of the SFCA is the general overview of the flood risk in relation to the plan as a whole, Stage 2 is an assessment of the risks to candidate sites and Stage 3 relates to more details assessments of those candidate sites which don’t comply with TAN15 at stage 2.
- 8.32 Additionally, the site assessment methodology set out in Topic Paper 1 (PT.001) was developed in order to assess proposed sites against the Plan’s strategy and a range of planning, environmental, and physical criteria. In accordance with Planning Policy Wales (para 9.2.9) the criteria included a precautionary approach to site identification and sought to avoid potential development sites in areas at high risk of flooding.
- 8.33 Therefore, the Councils adopted a precautionary approach to site identification. At the Deposit Plan stage in weighing up the need to consider flood risk and the need to safeguard a range and choice of land for employment and housing to meet evidenced need the Plan identified land within flood risk areas. These are: sites safeguarded for employment for which planning consent had already been granted, i.e. Adwy’r Hafan, Pwllheli (C6); Business Park, Porthmadog (C8); Griffin Industrial Estate, Penrhyndeudraeth (C39), and a housing allocation in Bangor (T4).
- 8.34 Continued engagement with Natural Resources Wales has revealed that vacant land at the Griffin Industrial Estate, Penrhyndeudraeth (C39) forms a flood storage area created when the land was developed in the 1980s. In light of this information, if deemed acceptable and appropriate by the Inspector, the Councils would therefore like to propose an amendment to the Penrhyndeudraeth Inset Map to exclude the site from the safeguarded employment sites and the development boundary to be addressed as a potential Matters Arising Change (MAC). The amendment is shown in Appendix 1 to this statement. This MAC would also require a consequential change to Policy CYF 1, which provides a schedule of employment sites. The Councils understand that Natural Resources Wales is satisfied subject to the removal

of the flood storage land from allocation C39 and therefore remove their objection to this safeguarded employment site. Natural Resources Wales draws the Inspector's attention to the need for any future development proposal within this safeguarded employment site to maintain access for maintenance vehicles to the flood storage area.

- 8.35 A stage 2 SFCA (DC.022) was undertaken for Porthmadog in response to objections regarding the lack of housing allocations in this Urban Service Centre and the indicative housing target for Penrhyndeudraeth, a nearby Local Service Centre. This demonstrated that there were no suitable sites for housing allocations within Porthmadog. In terms of the Business Park in Porthmadog (C8), the recent modelling work undertaken by Natural Resources Wales that underpins the aforementioned SFCA suggests that the Business Park lies outside the flood risk area. The Councils have commissioned an additional stage 2 SFCA in order to demonstrate the matter. The conclusions of this stage 2 SFCA is included in Appendix 2 to this statement. The full report is included as an appendix to the statement for individual sites. The Councils will continue to discuss the matter with Natural Resources Wales in order to determine whether it is satisfied with the Councils' approach.
- 8.36 In terms of the Adwy'r Hafan site in Pwllheli (C6) the Councils confirm that most of the site is already developed. A vacant plot known as Cae Ceffyl has recently been granted planning permission for a hotel. The following provides a link to the Committee report, which discusses flood risk issues:-
- <https://diogel.cyngor.gwynedd.gov.uk/swiftlg/imagetemp/44971-302984.pdf>
- 8.37 The Councils confirm that all detailed planning proposals to redevelop plots or for the change of use of buildings on the aforementioned employment sites would need to comply with development management policies in the Plan as well as PPW and TAN 15.
- 8.38 Following public consultation about the Deposit Plan, which resulted in an objection from Natural Resources Wales regarding housing allocation Former Crossville site (T4), a stage 2 SFCA (DC.023) was undertaken regarding the suitability of this housing allocation. In response to this study Focus Changes NF77 and NF112 remove the site from the Plan.
- 8.39 The Councils consider that the proposals in Plan (subject to Focus Change NF77 and NF112, and the proposed Matters Arising Change referred to in paragraph 8.34 above) have been fully assessed against the requirements of national planning guidance contained in PPW and TAN15 and in view of this the proposals included in the Plan conform with national planning policy relating to development and flood risk.
- 8.40 In addition to the work relating to plan allocations set out above, the Plan also contains policies (Policy PS5 and PS6 and Policy ARNA 1) relating to flood risk which aim to avoid unnecessary flood risk by ensuring development proposals within areas susceptible to flooding are strictly assessed in terms of flood risk and are prevented where they unacceptably increase flood risk again ensuring the Plan conforms with national planning policy relating to development and flood risk.

**8g. Does the Plan's Spatial Strategy successfully translate national policy in relation to the best and most versatile agricultural land to the local level?**

- 8.41 **Response** - Yes, the Councils have sought to minimise the loss of best and most versatile agricultural land. The process of identifying land for new housing units to address the Plan's housing requirement has followed a sequential approach: identification of new housing built since 2011; sites with extant planning consent whose delivery would accord with the Plan's strategy; suitable and developable sites within existing settlements, including brownfield sites and existing buildings; before seeking additional sites that would expand the built form of existing settlements.
- 8.42 The site assessment methodology set out in Topic Paper 1 (PT.001) was developed in order to assess proposed sites against the Plan's strategy and a range of planning, environmental, and physical criteria. In accordance with Planning Policy Wales (para 4.10.1) the criteria included BMV agricultural land – see Appendix 3 of Topic Paper 1. The initial Agricultural Land Classification of sites was based on published information made available by the Welsh Government's Agriculture and Rural Affairs Department. The results of the site assessments are included in Topic Paper 1B (PT.003). None of the housing allocations involve the loss of BMV agricultural land.
- 8.43 To accommodate the evidenced need for land to provide opportunities for new jobs in sustainable locations, and in recognition of the fact that the Plan covers a primarily rural area, it is inevitable that greenfield sites will be required. The Employment Land Review (DC.004) involved a comprehensive review of current employment sites and premises with the results a key informant of strategic and detailed policies in the Plan. In preparing the Plan, the identification of a sustainable settlement hierarchy ensures that development is distributed in a sustainable manner. The identification of this hierarchy reflected and promoted sustainability by seeking to improve accessibility to essential services and facilities, and as a consequence reduce the need to travel as much as is possible within a rural area. It seeks to increase social inclusion achieving viable, self- supporting settlements and sustainable communities. Distributing the employment land in accordance with the settlement hierarchy ensures that the distribution of employment land is located in the most sustainable and accessible locations and is in alignment with the distribution of housing land. Furthermore, directing employment land to the most sustainable settlements allows the opportunity to coordinate infrastructure development to meet the needs of numerous developments in the same vicinity. The Councils recognizes that this means that this could lead to the loss of BMV. However, this has to be balanced against the need to provide a range and choice of new jobs to meet evidenced need. The Councils acknowledge that there is insufficient brownfield or lower grade agricultural land within or near to some key Centres. The Councils also acknowledge that lower grade agricultural land correlates with areas of high landscape value or are areas not well related to existing Centres. In achieving the strategy the Plan therefore allocates a relatively small proportion of BMV agricultural land in the vicinity of Llangefni (Urban Centre) as employment land. This accounts for only 3.6% of the employment land allocated and safeguarded in the Plan area.
- 8.44 The site selection assessment methodology for solar farms was developed to identify opportunity areas. In accordance with the Welsh Government's revised Renewable Energy Toolkit for Planners the methodology used to identify opportunity areas included consideration of BMV agricultural land. The methodology and the results are

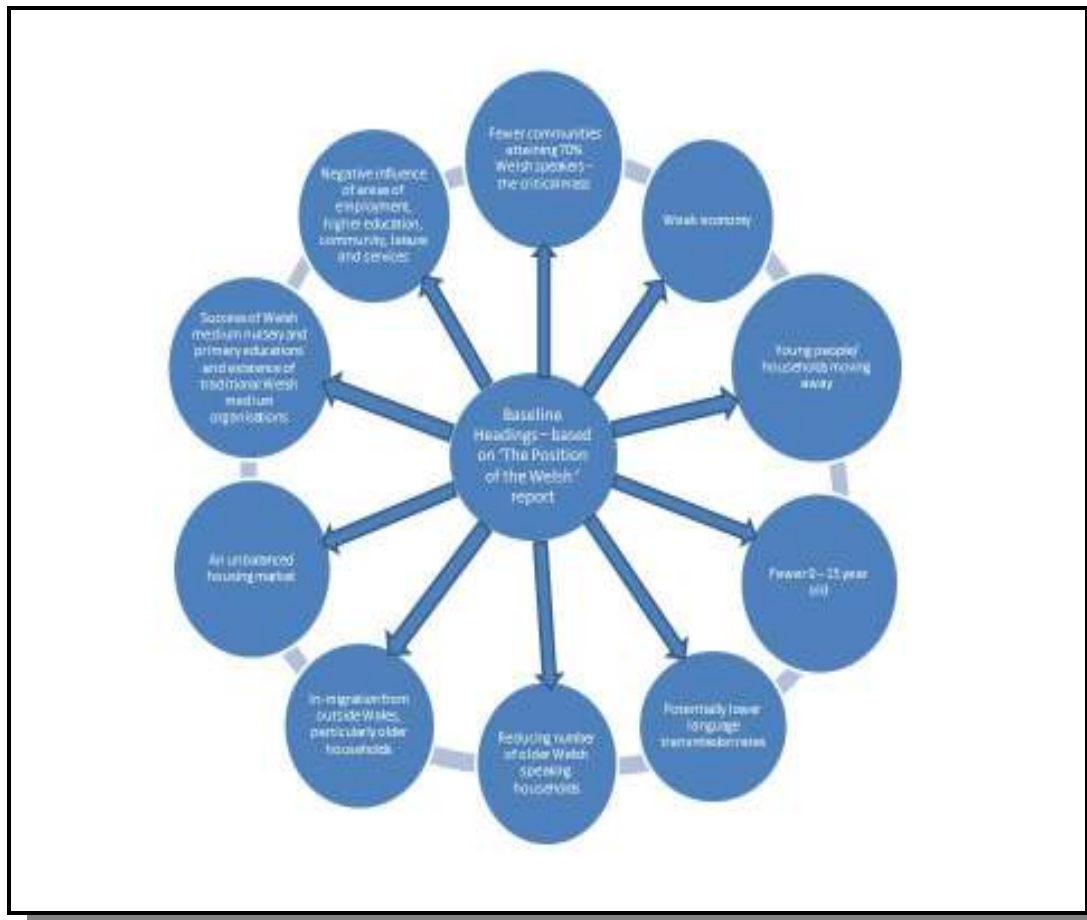
set out in “Assessment of the potential for solar PV farms in Gwynedd and Ynys Mon (DA.020b). None of the top rated opportunity areas or alternative opportunity areas would involve the loss of BMV agricultural land.

- 8.45 Therefore, the Councils consider that on the whole the Plan seeks to avoid the use of BMV agricultural land as far as is possible.

<b>9 Does the Plan’s strategy adequately safeguard the interests of the Welsh language?</b>
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- 9.1 **Response** – Yes. Section 61 Planning and Compulsory Purchase Act (PCPA) (as amended by Section 11 of the Planning (Wales) Act 2015) requires local planning authorities to keep evidence of the extent to which the Welsh language is used in the area up-to-date. Section 62 PCPA, as amended by Section 11 of the Planning (Wales) Act 2015, requires the Sustainability Appraisal of local development plans to include an assessment of the likely effects of the plan on the use of the Welsh language in the area. Section 70 of the Town and Country Planning Act 1990 (as amended by Section 31 of the Planning (Wales) Act 2015) makes it clear that where it is material to the application, considerations relating to the use of the Welsh language may be taken into account when determining applications for planning permission. This provision does not give any additional weight to the Welsh language above any other material consideration. It is estimated that between 1,200 and 2,200 fluent Welsh speakers are moving out of Wales each year. One of the aims of the Welsh Government is to reverse this trend; the creation of jobs to sustain communities and the local economy is a key priority.
- 9.2 There is no prescribed way of assessing whether the Welsh language is part of the social fabric of a community. The Welsh Government’s National Action Plan for a bilingual Wales *Iaith Pawb* says that communities where Welsh is spoken by over 70% of the local population, Welsh is more likely to be spoken in social, leisure and business activities and not just in the home and in school. With 65.4% of the resident population in Gwynedd and 57.2% of the resident population in Anglesey recording themselves as Welsh speakers in 2011, the language is still considered to be an integral part of the Plan area’s social fabric. Naturally there is a relatively strong Welsh identity with a population that largely considering themselves to be Welsh - 63% of the resident population in Gwynedd and 59.4% recording themselves as being Welsh only and Welsh and British only identity (table KS202EW – National identity).
- 9.3 There has been a decline in the proportion of Welsh speakers in the Plan area between the two Censuses. It is likely that the reduction is as a result of a number of factors, which include: demographic changes in the population (including fewer children, more older adults, and a loss of older cohorts with higher levels of Welsh speakers), people migrating out of and into the Plan area, and changes in people’s skills and attitudes to the language.
- 9.4 Topic Papers 10, 10A and 10B (PT.0019, PT.0020, PT.0021) record information about the Welsh language, drawing mainly from the 2011 and 2001 Census. Topic Paper 3A Population and Housing (PT.007) records information about demographic changes as does the Sustainability Appraisal Scoping Report (CDLL.007) and the Welsh Language Impact Assessment Report (2013) (CDLL.011). The Gwynedd and Anglesey Housing and Welsh Language Survey report (DC.014) provides a snapshot

of the situation in relation to the Welsh language and its use in specific wards in the Plan area and the Snowdonia National Park. The diagram below provides an overview of factors that have influenced the level and use of the Welsh language.



- 9.5 Planning Policy Wales (Chapter 4) states that development plans should include a statement on how they have taken the needs and interests of the Welsh language into account in the plan preparation. Paragraphs 6.23 to 6.25 as amended by Focus Change NF 10 clearly set out how the Welsh language should be addressed in the Plan.
- 9.6 The future wellbeing of the Welsh language is dependent on a variety of key factors such as education, demographic change and community activities as well as economic prosperity. The planning system can take account of the needs and interests of the Welsh language and its wellbeing by preventing development that could have a significantly harmful affect and facilitating development that could beneficial effects.
- 9.7 New development can have both beneficial and harmful effects on the Welsh language. Beneficial effects can occur when development encourages Welsh speakers to remain in their communities, for example affordable housing for local need, or when it supports the viability of village facilities, such as the school. Providing employment opportunities can help retain Welsh speakers in the area and prevent them from migrating out of the area. Commitment by new employers to providing a bilingual working environment can help to add to the numbers of Welsh speakers and complement other initiatives and strategies. Harmful effects can occur when a disproportionate number of non-Welsh speakers that do not learn the

language move into a community, when essential services or facilities needed to sustain communities and the Welsh language are lost, or there are few employment opportunities. These can often have cumulative effects, for example, by reducing the use of the Welsh language among Welsh speakers.

- 9.8 As is required, the Sustainability Appraisal has appraised the Plan at several stages throughout the Plan's preparation (CDLL.007). The SA process has been utilised to determine the key sustainability objectives for the Plan and to assess the Plan against these objectives in order to identify the likely effects of the Plan. This includes predicting and evaluating the effects of the Plan options, objectives, policies and site allocations on the social, environmental and economic objectives. The SA provides a framework by which the effects of the Plan can be assessed. The framework includes the following objective: conserve, promote and enhance the Welsh language. Additionally, the Councils undertook a Welsh Language Impact Assessment of the Plan at several stages to include an assessment of the likely effects of the plan on the use of the Welsh language in the area (CDLL.011 – 13) which helped inform the SA and the development of the Plan's strategy and policies. Objectors have commented on the information included in the report about the Welsh Language Impact Assessment report published alongside the Deposit Plan, but didn't comment on the SA report. Nonetheless, the Councils carefully considered the comments, and then made minor editorial amendments to correct information as well as other minor amendments to address relevant comments. A number of amendments were also made to the Deposit Plan via Focus Changes NF 10, 14, 15, 16, 19, 21, 50, 58, 62. No representations were received about the Focus Changes from the objectors who had commented on the Welsh Language Impact Assessment report. A revised Welsh Language Impact Assessment report was submitted and is included in the Examination library (CDLL.013).
- 9.9 Flowing from the Plan's Vision, strategic objective 1 of the Plan aims to safeguard and strengthen the Welsh language and culture and promote its use as an essential part of community life. The SA compatibility assessment indicated that there were no incompatibilities between SO1 and the SA objectives.
- 9.10 The manner in which the Plan primarily influences the Welsh language is through the location, scale and type of development as distributed by the Plan's Strategy and settlement hierarchy. As indicated in response to question 3c above, in developing the Plan, different strategic growth and spatial options were prepared and considered, which were assessed and measured against the sustainability framework. The SA concluded that the preferred options, as taken forward to the Deposit Plan, would provide the most sustainable strategy for the Plan area. The Welsh Language Impact Assessment of the Preferred Strategy (CDLL.011) concluded that the strategy would be unlikely lead to significant detrimental impact on the socio-economic structure of the area that might affect the viability of the Welsh language. Both assessments note that the Strategy aims to ensure that development opportunities are appropriate, directing the majority of development to the Plan area's Centres, whilst also sustaining rural communities. This allows a range of opportunities for growth across the Plan area, strengthening local communities, therefore encouraging local people, a higher proportion of whom are Welsh speakers, to remain within their communities.
- 9.11 There are a number of policy areas within the Plan which could potentially have a direct or indirect impact upon the SA Objective to conserve, promote and enhance the Welsh language. Appendix 3 of the Welsh Language Impact Assessment (CDLL.013) and Chapter 3 and Chapter 6 of the SA Report (CDLL.007) and its

Addendum (DA.021) record the assessment. The following Policies are associated with safeguarding the Welsh language and promoting circumstances that promote the interests of the Welsh language and in association with other initiatives can encourage its continued development:

<b>Policy Number</b>	<b>Policy Title</b>	<b>Comment</b>
PS1	Welsh language and culture	<ul style="list-style-type: none"> <li>Provides a framework that sets out when a formal assessment of a proposed development's impact on the Welsh language should be made, as well as setting out expectations in terms of signage and place names.</li> </ul>
PS2	Infrastructure and developer contributions	<ul style="list-style-type: none"> <li>Provides a framework to negotiate provision of infrastructure required to accommodate proposed developments at a planning application stage, which could include contributions to facilities/ services that promote the Welsh language.</li> </ul>
ISA1	Infrastructure provision	
ISA2	Community facilities	<ul style="list-style-type: none"> <li>Protects existing essential community facilities and promotes new ones, thus contributing to maintaining or enhancing a network of places where the Welsh language is promoted.</li> </ul>
PS5	Sustainable development	<ul style="list-style-type: none"> <li>Promotes development that contributes to creating or maintaining balanced communities, which could be beneficial to the well-being of the Welsh language.</li> </ul>
PCYFF1	Development criteria	
PS8	Proposals for large scale infrastructure	<ul style="list-style-type: none"> <li>Facilitates development that secures positive economic outcomes for local communities.</li> <li>Facilitates development that could transform the Plan area into</li> </ul>
PS9	Wylfa Newydd related development	
PS10	Providing opportunity for a	

CYF1	flourishing economy Safeguarding and allocating land and units for employment use	<p>an enterprising and vibrant area economically and socially, allowing people to live and work locally, improve quality of life, reduce out migration of households, etc.</p> <ul style="list-style-type: none"> <li>• Supports economic prosperity and the sustainability of rural communities.</li> <li>• Sustains and promotes a prosperous tourism sector, which provides employment opportunities for local households.</li> <li>• Contributes to maintaining a permanent housing stock and supports the cultural character of local communities.</li> </ul>	
CYF3	New large single user industrial or business enterprise on sites not safeguarded or allocated for employment purposes		
CYF4	Alternative uses of employment sites		
CYF5	Reuse and conversion of rural buildings, use of residential properties or new build units for business/ industrial use		
CYF6	Regeneration sites		
CYF7	Holyhead regeneration area		
PS11	The visitor economy		
TWR1	Visitor attractions and facilities		
TWR2	Holiday accommodation		
TWR3	Static caravan and chalet sites and permanent alternative camping accommodation		
TWR4	Holiday occupancy		
TWR5	Touring caravan, camping and temporary alternative camping accommodation		
PS12	Town centre and retail developments		<ul style="list-style-type: none"> <li>• Protects and enhances the vitality and viability of town centres in the Plan area for the benefit of local communities, thus maintaining their attractiveness.</li> <li>• Facilitates the improvement and expansion of small scale retail provision in rural areas, contributing to maintaining a network of places where the</li> </ul>
MAN4	Safeguarding village shops and public houses		
MAN5	New retailing in villages		
MAN6	Retailing in the countryside		



		Welsh language is promoted.
PS13	Housing Provision	<ul style="list-style-type: none"> <li>• Promotes development that creates a healthy and balanced housing market, which supports the delivery of sustainable communities – therefore, contributing to sustaining or strengthening the well-being of the Welsh language.</li> <li>• Promotes sustainable mixed communities by ensuring that all new residential development contributes to improving the range of housing available in terms of type and tenure, meeting the identified needs of the whole community.</li> <li>• Promotes local market/affordable housing for local people.</li> <li>• Promotes an appropriate level of affordable housing across the Plan area.</li> <li>• Promotes an appropriate scale of development, aligned with the settlement's role in the Plan area.</li> </ul>
PS14	Affordable Housing	
TAI1	Appropriate housing mix	
NEW X HOUSING	New x housing	
TAI2	Subdivision of existing properties to self-contained flats & houses in multiple occupation (HMOS)	
TAI3	New build purpose built accommodation, housing in multiple occupation and other housing with shared facilities for transient construction workers	
TAI4	Residential care homes, extra care housing or specialist care accommodation for the elderly	
TAI5	Local market housing	
TAI9	Affordable housing threshold & distribution	
TAI10	Exception sites	
TAI14	Housing in sub-regional centre & urban service centres	
TAI15	Housing in local service centres	
TAI16	Housing in service villages	
TAI17	Housing in local, rural & coastal villages	
TAI18	Housing in clusters	
TAI19	Conversion of traditional buildings in open countryside	

9.12 In response to representations made about Focus Changes the Councils considered that there was merit in suggesting amendments to paragraph 7.1.3 and Policy PS 1 and its explanation. If deemed acceptable and appropriate by the Inspector, the

Councils would therefore like to propose amendments (in red) to 7.1.3 and Policy PS 1 and its explanation, to be addressed via Matters Arising Changes (set out in Appendix 3 to this Statement.

- 9.13 The allocated sites were all systematically appraised in the SA (Chapter 7) against the SA framework. The Welsh Language Impact Assessment (Chapter 5) (CDLI.013) considered the impact of the proposed level of housing growth to Centres and Service Villages, within the context of the relevant policies described above. Overall it can be concluded that the Deposit Plan contains sufficient measures to mitigate adverse impacts and actions to promote positive impacts to ensure that potential negative effects are not significant.
- 9.14 The Councils consider that the Plan has been prepared with regard to all relevant legislation and national planning policy and guidance in respect of the Welsh language. They consider that the Plan's strategy therefore contributes to adequately safeguard the interests of the Welsh language and that it is soundly based. The Councils takes this opportunity to draw attention to the commitment to prepare Supplementary Planning Guidance to support the Plan. "Scope of Supplementary Planning Guidance and draft preparation timetable, June 2016" (DA.010b) expands on Appendix 9 in the Plan to provide a broad overview of each SPG, including the "Maintaining and creating distinctive and sustainable communities" SPG.

## **10 Is the Plan's Strategy deliverable?**

### **10a. Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites, including in terms of sewerage capacity?**

- 10.1 **Response** - Yes. Preparation of the Deposit Plan involved identification of existing infrastructure capacity future infrastructure requirements associated with planned housing and employment development on allocated sites. Information is included in a series of documents: Topic Paper 13: Community Infrastructure – baseline information (PT.024); Topic Paper 1B Candidate Sites Assessment – update (2016) (PT.003); Topic Paper 14 Open space assessment (PT.025); Topic Paper 19 Settlement Profiles (PT.032). More recently, the Councils have published a Sites Deliverability Topic Paper (DA.015) that highlights the known infrastructure requirements on a site by site basis. Where possible, it also identifies the organisations responsible for providing the infrastructure and the means (financial or otherwise), by which the infrastructure will be provided.
- 10.2 Dŵr Cymru Welsh water (DCWW) is the statutory undertaker providing public water and sewerage services throughout the plan area. In preparing the Plan the Councils have worked closely with DCWW, consulting with them regarding the distribution of growth at each stage of the plan preparation process. DCWW has provided relevant water, sewerage and waste water treatment comments on development allocations at each stage in the Plan's preparation process. The general view of DCWW is that water supply and sewerage can be provided, however for some larger development sites additional off-site provision of services and/or hydraulic modelling assessments may be required. In order to improve clarity a statement of Common Ground dated 18-05-16 has been prepared between the Councils and DCWW which provides further information regarding the funding and delivery of such infrastructure. A copy of the statement can be seen in the Sites Deliverability Topic Paper (DA.015).

- 10.3 The background evidence suggests that there will be a need for some new or upgraded infrastructure in order to make development acceptable in planning terms. Nonetheless, it is considered that the levels of housing or employment growth proposed for individual settlements, as well as the scale of enabling infrastructure required, means that the delivery of the Plan is not dependent on major infrastructure projects. Revised Topic Paper 20A Housing Trajectory (DA.023) aligns with the information provided in the Sites Deliverability Topic Paper.
- 10.4 Therefore, the Councils are of the opinion that all infrastructure requirements have been identified and have demonstrated that there are no unsurmountable site constraints.

**10b. Are the allocated sites based on robust site assessment methodology that takes into account potential constraints?**

- 10.5 **Response** - Yes. The allocations within the Plan have been subject to robust and comprehensive site assessment as set out in the various iterations of Topic Paper 1 (PT.001 – PT.003), which provides details of the Candidate Sites Assessment methodology and the results. Development of the methodology involved public consultation during August 2011. It was developed to enable the assessment of candidate sites against a range of planning, environmental, and physical criteria, which was undertaken in stages.
- 10.6 The evidence base has included extensive consultation with internal Council Departments and statutory consultees to identify any site constraints, which are detailed in Topic Papers 1A and 1B (PT.002 and PT.003) and the Site Deliverability Topic Paper (DA.015). Based on the available evidence the development of allocated housing and employment sites is not considered to be reliant on strategic infrastructure projects. As referred to in the response to question 10a the need for infrastructure does not mean that development on sites in settlements will be prevented from progressing as developers can either fund improvements themselves via the planning obligations process or enter into a requisition process to provide the infrastructure to bring forward development in advance of any regulatory investment.
- 10.7 The Councils therefore consider that the site selection process as summarised above is based on a robust methodology.

**10c. Are policies PS2 and ISA1 based on a robust evidence base?**

- 10.8 **Response** - The policies include an indicative schedule of likely contributions that may be sought from future development proposals, based on the type of infrastructure identified in Topic Paper 13 Community Infrastructure – baseline information (PT.024) and Topic Papers 1A and 1B (PT.002 and PT.003). Policy PS1 doesn't present a prioritised list. The final infrastructure requirements will be determined on a case by case basis at a planning application stage, having regard to the type of development, the circumstances that will be specific at the time of the planning application and the statutory tests. The information provided in the aforementioned Topic Papers will provide a useful starting point for applicants/ developers to develop their proposals, including negotiations with landowners.
- 10.9 Topic Paper 13 groups the infrastructure into three categories: essential, necessary and community. This categorisation could assist where the applicant/ developer has

demonstrated that the development cannot deliver all the Council's planning obligations.

**11 Is the Plan's Strategy sufficiently flexible to respond to changing circumstances?**

**11.1 Response** - Yes, the Plan's preparation involved identification of issues and drivers. The strategy and policies set out how the Councils will consider planning applications, set targets for growth and the broad distribution of development that reflects identified needs. They are also intended to provide sufficient flexibility to respond to opportunities and changing priorities. The Plan aims to ensure that policies are appropriately flexible to respond to specific requirements of new business and growing business. To do this a flexible approach is needed that ensures sufficient sites and premises of the right type are available in the right places at the right time. Finally, the Annual Monitoring Report provides a key mechanism to monitor the delivery of the Plan. This will be used to assess whether a review is necessary in case of a significant or fundamental change in circumstances.

**11a Can the Plan respond effectively to changes in the Wylfa Newydd project?**

**11.2 Response** - Yes. Given the size, complexity and the influence of commercial decisions that may be taken in relation to the Wylfa Newydd project, it is not possible to predict with absolute certainty the demand for land generated either from the project itself or from the significant supply chains that it will require. Faced with these uncertainties, the Plan responds by ensuring that there is ample choice of employment land for a range of users with a range of requirements. The evidence base also includes a robust assessment of the likely additional housing units required as a result of the anticipated improved economic prospects for the Plan area, particularly Anglesey. Based on the evidence the Plan includes for a quantum of housing which reflects the permanent economic benefits derived from the Anglesey Energy Island, Enterprise Zones etc., of which the Wylfa Newydd Project is an important part. Horizon Nuclear Power continues to aim to submit an application for its Development Consent Order in February 2017 and therefore obtain a decision in 2018.

**11.3** It would be inconsistent for the Plan not to provide a framework to enable the Councils to be in a position to respond positively to the anticipated changing economic and social circumstances linked to the Wylfa Newydd project.

**11.4** The Plan is considered to be sufficiently flexible to respond to changing conditions. The amount of housing and employment land required will be kept under review in the Annual Monitoring Report (AMR). The AMR forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its proposals are delivered within the anticipated timeframes.

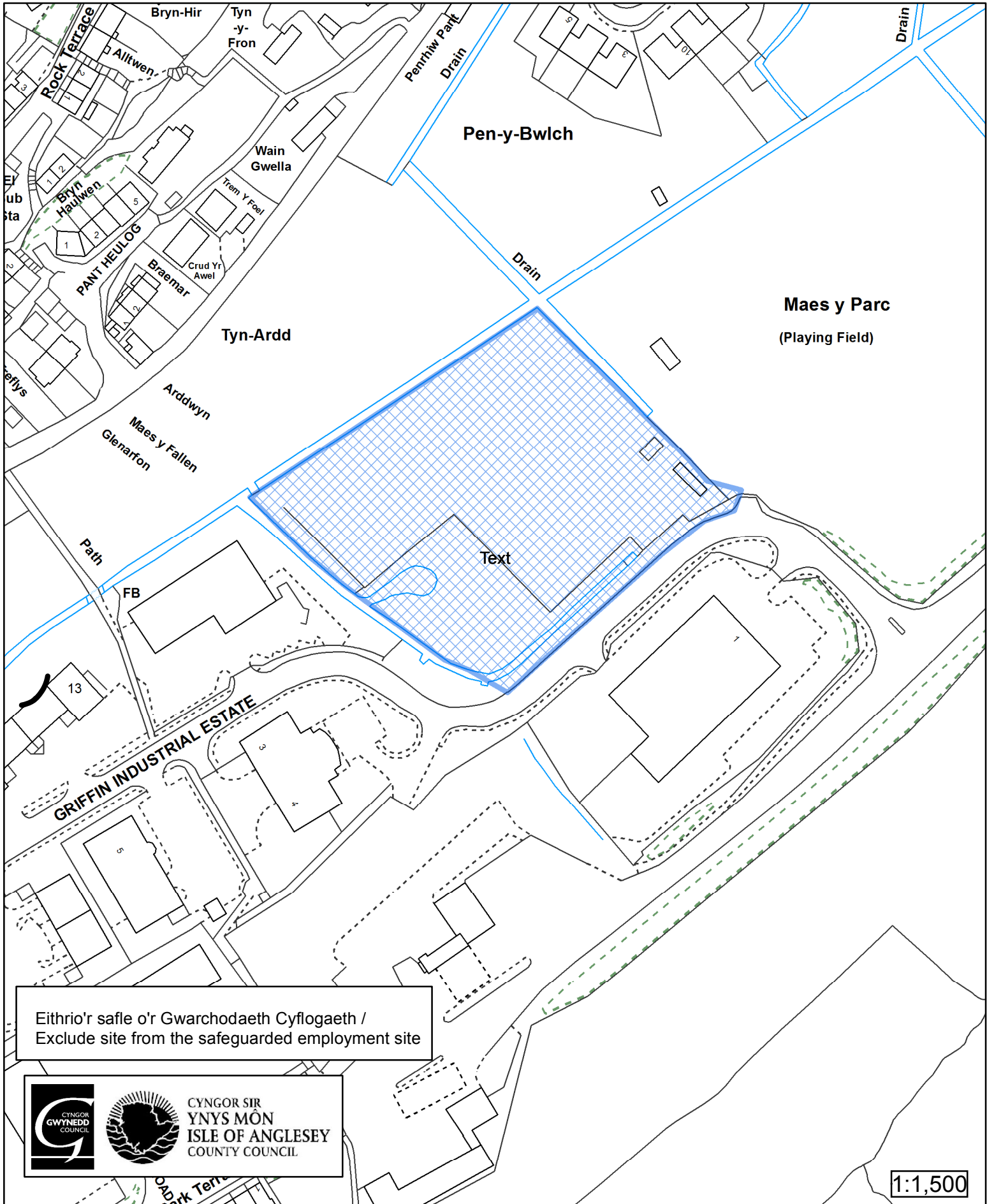
**11.5** The AMR will also analyse the effectiveness and continued relevance of the Plan's policies in the light of circumstantial changes. Monitoring will enable the Councils to not only record behind any deviation from anticipated rates. If it appears that the targets are not being reached, or that there is a significant circumstantial change, it will be necessary to deal with this through a partial or full review. The response to question 12 below describes the Councils' willingness to make additional changes to the Monitoring Framework to improve its robustness.

<b>12 Does the Plan provide robust mechanisms for the Monitoring and Implementation of the Plan's Strategy?</b>
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12.1 **Response** - Chapter 8 of the Plan includes a Monitoring Framework, which was subject to Focus Changes (CDLL.023). In response to the Inspector's preliminary note to the Councils in May 2016 (DA.002), the Monitoring Framework's presentation was refined and presented to the Examination (DA.010c). The Councils are prepared to make additional necessary changes to the Framework to ensure it is always a forward looking process to monitor the Plan's effectiveness, incorporating a commitment to take action if development does not come forward as expected and identify measures to be undertaken to address any changes.

# Atodiad 1 / Appendix 1

## Stad Diwydiannol Griffin (Newidiadau Materion sy'n Codi) Griffin Industrial Estate (Matters Arising Change)



Eithrio'r safle o'r Gwarchodaeth Cyflogaeth /  
Exclude site from the safeguarded employment site



1:1,500

## **Porthmadog Business Park**

## **Flood Consequences Assessment**

### **Conclusions**

The site is located within Flood Zone C1 on the Welsh Government Development Advice Map – an area considered at flood risk, but served by significant infrastructure, including flood defences, with a 0.1% (1 in 1000) or greater annual probability of flooding.

Site specific flood depth and extent mapping has been produced from the outputs of the Afon Glaslyn and Tributaries (at Porthmadog) hydraulic model.

The site is shown outside of the modelled fluvial flood extent during all events up to and including the 1 in 1000 annual probability event.

The site is shown to be flood free during the defended tidal 1 in 200 annual probability event with climate change up to 2112.

A small extent of the site at the south-eastern corner is shown at risk during a breach of the Crwn Town ward defence coinciding with a 1 in 200 annual probability tidal event with climate change up to the year 2112. Flood depths during this event are less than 110mm.

Any like for like development, retaining the less vulnerable use on previously developed ground, would be permitted. Flood resistance and resilience should be incorporated to minimise the flood risk and provide betterment to the existing situation.

For development on previously developed land, any additional units, resulting in an intensification of site use, would need to comply with Sections A1.14 and A1.15 of TAN15.

For development on undeveloped land, development would need to be classified within Flood Zone A and as such is required to be flood free during all events up to and including the 0.1% annual probability event when accounting for climate change and defence breach.

Any development comprising intensification to the existing use or any new development on undeveloped land would need to be supported by hydraulic modelling of the tidal 0.1% annual probability plus climate change event. This would enable an assessment under Section A1.15 of TAN15.

A safe evacuation route is available from Penamser Road, heading west. The site is in an area which is served by flood alerts.

7.1.3 Where development is proposed, consideration must be given to the enhancement and protection of the language and culture. Key to this is sustaining existing communities. The Plan, along with national planning policy and guidance, offers a number of policy approaches that although not directly referring to the Welsh language, along with other partner initiatives, will have a positive impact. The strategy recognises that a large proportion of the existing population live in rural settlements and therefore supports rural as well as urban communities.

7.1.3a Probably of most importance to sustaining local communities and strengthening the language is the need to promote healthy local economies. This approach provides opportunities for people to remain within the Plan area rather than seeking jobs elsewhere. The Plan includes a series of Policy that will facilitate this objective, encouraging economic opportunities close to where people live which will have a positive effect on the vibrancy of the community and the Welsh language. Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as **an the** official language in Wales. There should be a commitment to treat Welsh and English on an equal basis. Policies will help ensure that the right level and type of need is met and that the rate at which the development comes forward allows the development to be absorbed without damaging the character of the community. Additionally policies will aim to retain existing community facilities and facilitate replacement facilities or new facilities, as appropriate. **SPGs will reinforce policies by providing guidance on the type of information or assessment that will be required at planning application stage to illuminate an assessment of the impact, any potential damage, and the potential need for mitigation and/or measures to promote positive effects.**

#### STRATEGIC POLICY PS1: Welsh Language and Culture

The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:

1. Requiring a Welsh Language Statement, which will protect, promote and enhance the Welsh language, where the proposed development falls within one of the following categories:
  - a. Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq m. or more; or
  - b. Residential development which will individually or cumulatively provide more than the indicative housing target set out for the settlement in Polies TAI 14 – 18; or
  - c. Residential development of 5 or more housing units on allocated or windfall sites **inside development boundaries** that doesn't **address evidence of need and demand for houses recorded in Housing Market Assessments and other relevant local sources of evidence propose to provide an adequate range of sizes and types of housing units;**
2. Requiring a Welsh Language Impact Assessment, which will set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development involves a windfall site **outside development boundaries for the development of large-scale housing development or developing employment on a large scale which would mean a significant flow of workforce; and**



- ~~a. Going to attract or accommodate many more people than originally envisaged in the policies and proposals of the Plan;~~
3. Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or contribution is made towards them mitigating those impacts;
4. Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community;
5. ~~Encouraging~~ Requiring all operational signage by public bodies and by commercial and business companies to be bilingual;
6. ~~Encouraging the use~~ Expect that of Welsh place names are used for new developments, house and street names.

**Explanation:**

**7.1.4** It is intended that all of the measures outlined in the paragraphs that precede this Policy will support communities and the Welsh language. The key objectives of the Plan demonstrate a commitment to promote balanced, sustainable and distinctive communities. This means that the Plan includes policy tools to allow local communities to change and grow sustainably and to address the needs of all members of communities. There are a number of strategic and detailed policies that will give an explanation on how development proposals will be managed. On the whole the Sustainability Assessment (which was informed by the Language Impact Assessment) looks positively on policies and proposals of the plan on the grounds that development takes place at the appropriate scale and in the appropriate places, including measures to promote positive effects and mitigate adverse effects.

**7.1.4A** Nonetheless, As can be seen in criteria 1 and 2 in Policy PS1, in order to make an informed judgment at a planning application stage information will be sought in relation to applications where development, if permitted, would come forward at a rate or scale different to that envisaged at the Plan preparation stage as set out in criteria 1 and 2. Policy PS1 reinforces other relevant policies in the Plan, which provide details on the assumptions made, e.g. the level of housing growth per settlement (TAI 14 - TAI 18); that housing development will provide an appropriate choice of market housing and affordable housing (TAI 1). Pre-application advice should be sought from the LPA as to whether a Statement or an Assessment should be provided. Having signs in Welsh and English, and Welsh place and property names are a clear indication of the character of the area, including its linguistic character. The Welsh language will be promoted through different policies within the Plan. The range of opportunities provided by the strategic and detailed policies, including a variety of different dwelling types, local employment growth and protecting and enhancing the cultural heritage will contribute towards improving the vitality of the Welsh language. A Maintaining and creating distinctive and sustainable communities Supplementary Planning Guidance (SPG) will be published and a Type And Mix Of Housing SPG to provide further guidance on the matter. They will explain the type and location of development that is likely to be acceptable in the Plan area, explaining the relevant planning considerations. The Creating and Maintaining Distinctive and Sustainable Communities SPG will describe signs that are expected to be bilingual, e.g. public information signs, advertisements, display advertisements. The Statement or report on the Assessment allows the developer to explain his proposal in more detail and to consider the possible positive and negative effects on the community and its linguistic balance. The SPGs will look, for example, for evidence that the proposal has been discussed with Community, City and Town Councils and local community groups

### Appendix 3

to obtain information and ask for their opinion, and that consideration has been given to surveys about the local housing market, and/ or the labour market . In addition, they will refer the applicant to such assistance as is available from the Office of Language Commissioner about designing bilingual signage and marketing material, the advice that is available to the private sector by the Welsh Government/ Business Wales regarding bilingualism.