GWYNEDD & ANGLESEY JOINT LOCAL DEVELOPMENT PLAN (2011 – 2026)

PUBLIC EXAMINATION:

Hearing Session 3 – Spatial Distribution



Action Point (S3/PG4) – Windfall opportunities

1] Matter under consideration:

Prepare a paper expressing how the Plan provides windfall opportunities within rural and urban settlements to meet the indicative growth which has been identified. Specific examples of settlements should be used in doing so, showing the development boundaries of current plans, and explaining any exceptional cases ("anomalies"). There should be an explanation of the windfall figure, which appears to be high.

2] Councils' response:

What are 'windfall sites'?

2.1 Policy TAI 14 – Policy TAI 17 as presented in the Deposit Plan provided an indicative number of housing units that could be delivered on what was then described as 'windfall sites'. In that context, the Plan sought to clarify via a footnote that 'windfall sites' included: (i) existing sites with planning permission which are incomplete or not yet started, and (ii) sites with no current planning history. For example, Policy TAI 14 in the Deposit Plan notes a total of 393 housing units to be developed on various housing allocations for Bangor and that 479 housing units could be built/ provided on windfall sites. The footnote states that there is already planning permission for some of the housing units within the total for windfall sites. This is in addition to the 97 housing units that had already been built between 2011 - 2014. Similarly, Policy TAI 17 in the Deposit Plan notes that a total of 27 housing units could be built/ provided on windfall sites in Llandegfan, and the footnote again refers to the existence of housing units with existing planning permission.

Settlement	Total housing units on allocations	Indicative total housing units on windfall sites	
Bangor	393	479	
Llandegfan	0	27	
Wording of footnote for Policy TAI 14 – Policy TAI 17 "Some units will already have planning			
permission in April 2014 (see Appendix 5)."			

2.2 In response to Action Point S4/ PG2, and in relation to discussions in other Hearing Sessions (where it became clear that the Plan wasn't sufficiently clear/ consistent with terminology used by Welsh Government, as to what constitutes a 'windfall site') the Councils have proposed a Matters Arising Change to the Plan's Glossary of Terms, which is as follows:

Windfall sites:

"Sites not specifically allocated for development in the Plan, but which become available for development during the lifetime of the Plan. Most 'windfalls' are referred to in a housing context." (Revised glossary S4/PG2).

How many units are expected on windfall sites?

- 2.3 The housing policies in the Plan refer to the role of sites with existing planning permission to address the demand for new housing during the Plan period. In order to demonstrate how much of the indicative total of housing units for individual settlements have been built since 2011 (i.e. completed housing units), or might be built/ provided on sites with existing planning permission (i.e. commitments (Land Bank) (Housing)), statistics were provided in Appendix 5 of the Deposit Plan. The statistics in Appendix 5 of the Deposit Plan are based on the Housing Land Availability Studies in April 2014. This information was available when the Deposit Plan was being prepared. At the time, the Councils considered that this would give the reader a picture of how many housing units could be built/ provided on other sites within the development boundaries or sites outside development boundaries that would be compatible with the relevant policies in the Plan.
- 2.4 In response to comments received and responses to the Inspector's questions for the Hearings, the information regarding which types of sites contribute to the housing supply was refined and updated to refer to the information at 2015. The information was provided by category in the Settlement Hierarchy. These tables were included as an appendix to the Councils' statement for hearings 2 and 3. During discussion in these hearings, it was suggested that the tables should be further refined to ensure clarity regarding the terms used in the table headings. The Council has done this, in response to Action Point S3/PG8 (please see the Examination Documents on the Council's website).
- 2.5 From an analysis of information on the situation in each settlement in April 2015, it is anticipated that 33% of the total supply within Centres and Villages will be developed/ provided on sites that have existing planning permission in April 2015. The principle of development has already been accepted, and therefore there is an element of security with these. It is anticipated that only 38% of the supply expected to be built/ provided on windfall sites in the Centres and Villages did not have planning permission in April 2015. The percentage was slightly lower (28%) for the Local / Coastal/ Rural Villages category, despite that there is no policy basis for the allocation of land in these settlements.

How were windfall sites identified in the Sub-Regional and Urban and Local Service Centres?

- 2.6 An Urban Capacity Study was carried out to record the opportunities for building/ providing housing units within the built form of the individual Centres. The Urban Capacity Study report was published and included in the Examination Library (PT.013). The detailed methodology includes fieldwork, desktop work, and consultation with development management officers and highways officers. By following the methodology, a snapshot is obtained of how many housing units can be secured by making use of vacant sites (without existing planning permission), and making use of buildings or parts of buildings that currently exist (without existing planning permission). By using a standard density (30 units per hectare), none of the vacant sites identified in the Urban Capacity Assessment fieldwork survey column were likely to offer 5 or more housing units. For that reason, they were not allocated in the Plan. Additional/different sites may emerge during the Plan period, e.g. through school modernisation programme, the property rationalisation strategies of public and private bodies, businesses shutting down, etc. None of the windfall sites recorded in the Urban Capacity Study included employment sites identified in Policy CYF 1.
- 2.7 Development boundaries have been drawn for the Plan's Centres to include the built form of settlements, housing allocations, commitments and opportunities for windfall sites. The development boundaries of the Anglesey Unitary Development Plan (Stopped) and the Gwynedd Unitary Development Plan was reviewed to reflect the development that has taken place in the settlements since the development plans were prepared, and to take account of sites with current planning approval (commitments) and any anomalies, e.g. buildings that were not included before, or buildings that were included before that were previously improperly included. Doing this was considered to be a sensible starting point. However, it is recognised that the level of growth for the Plan area is different and its objectives, spatial strategy, and its policies are different to current and previous plans. It was decided not to include sites on the edge of Villages and Centres where there was current planning permission for affordable housing on exception sites that had not been built or where the development was under construction, to try and ensure that the consent is implemented in accordance with the policy and to confirm that the consent had been given as an exception to open market housing policies. Concerns had been expressed that including them within development boundaries could lead to a delay in construction, in order to benefit from a location within the boundary in the new Plan.
- 2.8 This is the statistical formula used to shape the development boundary: the location of houses built since 2011 + sites with planning consent that have not been completed (commitments) + windfall sites arising from the Urban Capacity Study + housing allocations to address the supply of housing units needed for the Centre.
- 2.9 Appendix 1 to this paper includes maps that provide a snapshot of the land supply situation as at April 2015 for the following Centres, as examples of this layer in the Settlement Hierarchy: Bangor, Caernarfon, Llangefni, Benllech, and Llanrug.

2.10 If it appears that there are 'significant' changes between the development boundaries from one plan to the next, i.e. sites being withdrawn from the boundaries, the table provides an explanation.

Settlement	Notes
Bangor	 Indicative level = 969 Number of houses built 2011 – 2015 = 211 Number of houses with planning permission in April 2015 (commitments) = 398 Allocations without planning permission = 148 Units on windfall sites = 212 Reason for 'significant' change in development boundary - Land to the east of Ysbyty Gwynedd and therefore part of the housing allocation in the UDP was not included because alternative sites were available, including windfall sites identified through the Urban Capacity Study. In addition, by now, the housing allocation is in category 4 of the Housing Land Study 2016 since it has been included in the Study for over 5 years, with no recorded progress. On this basis, the anticipated components of the housing supply could deliver the number of housing units required to align with the indicative level of supply apportioned to the Centre.
Caernarfon	 Indicative level = 415 Number of houses built 2011 – 2015 = 41 Number of houses with planning permission in April 2015 (commitments) = 191 Allocations without planning permission = 71 Units on windfall sites = 112 Reasons for 'significant' change in development boundary - Land along Lon Santes Helen was not included within the development boundary because it was in a flood zone. Land in Dyffryn Cadnant was not included within the development boundary because it was in a flood zone. Land in Ffordd Llanberis and therefore part of the housing allocation in the UDP was not included because alternative sites were available, including windfall sites identified through the Urban Capacity Study, to address the supply. In addition, by now the housing allocation is in category 4 of the Housing Land Study 2016 since it has been included in the Study for over 5 years, with no recorded progress. On this basis, the anticipated components of the housing supply could deliver the number of housing units required to align with the indicative level of supply apportioned to the Centre.
Llangefni	 Indicative level = 673

Settlement	Notes
	 Number of houses built 2011 – 2015 = 57 Number of houses with planning permission in April 2015 (commitments)= 91 Allocations without planning permission = 443 Units on windfall sites = 82 Reason for 'significant' change in development boundary - Land to the east of Bryn Cefni was not included because it does not form part of Llangefni's urban form. On this basis, the anticipated components of the housing supply could deliver the number of housing units required to align with the indicative level of supply apportioned to the Centre.
Benllech	 Indicative level of supply apportioned to the centre. Indicative level = 90 Number of houses built 2011 – 2015 = 45 Number of houses with planning permission in April 2015 (commitments) = 25 Allocations without planning permission = 12 Units on windfall sites = 8 On this basis, the anticipated components of the housing supply could deliver the number of housing units required to align with the indicative level of supply apportioned to the Centre.
Llanrug	 Indicative level = 61 Number of houses built 2011 – 2015 = 18 Number of houses with planning permission in April 2015 (commitments)= 34 Allocations without planning permission = 0 Units on windfall sites = 9 On this basis, the anticipated components of the housing supply could deliver the number of housing units required to align with the indicative level of supply apportioned to the Centre.

How were windfall sites identified in the different Villages?

2.11 The Plan directs 25% of the housing growth to the Plan's various Villages, Clusters and Countryside. The status of a settlement in the Settlement Hierarchy Plan does not depend on how many people live there or its role in the current development plans. Paper Topic 5A recognises that there are differences within the rural areas of the Plan. By assessing information on the individual settlements and the surrounding area, it was noted that not every village plays the same role as others, that there is a difference in the availability of facilities and services within them, that the historical pattern of development and the use of housing in some mean that the housing stock does not address local household requirements as well as it should.

- 2.12 Ensuring housing for local households is causing concern across all communities in rural areas. The issue is worse in some communities because the mix of existing houses is characterised by high property values, beyond the income of many local households, pressure from households moving to rural areas, as well as a lack of opportunity to build appropriate new housing in the past. The Plan includes Policy TAI 5 Local Market Housing, to begin to address this issue.
- 2.13 Some Villages act as a focus for wider communities because of the existence of key facilities and services. These are known as Service Villages. As such, the Plan directs more new housing units to them than to the other villages, including a housing allocation if necessary. No Urban Capacity Study of Service Villages was carried out, because of their size, their role and the indicative level of growth that is directed to them. After identifying the indicative level of growth, we looked at how many housing units had already been built since 2011, the location and purpose of existing sites with planning approval, and desktop work using GIS information, aerial photographs and local information to identify potential 'white land' within or adjacent to existing development (i.e. infill sites or sites to round up present development). In cases where there was little opportunity to address the demand, allocations were identified.
- 2.14 The Plan also directs growth to other villages, namely Rural/ Local/ Coastal Villages. In order to improve the social sustainability of the villages that do not fall under Policy TAI 5, Policy TAI 17 in Rural/ Local/ Coastal Villages, Policy TAI 9 Affordable Housing Threshold and Distribution, and Policy TAI 10 Exception Sites all promote a mix of open market housing and affordable housing. The emphasis in Policy TAI 17 and Policy TAI 10 is on the promotion of housing on a scale that is appropriate to the settlement, and that the rate change will occur gradually. Therefore, the provision will come through small scale opportunities, consistent with the status of the settlement in the Settlement Hierarchy. These opportunities would be on small sites generally described as infill, rounding off, or minor extensions to the existing built form of the settlement. On the whole, this is consistent with historical experience in the villages where houses were built on small sites, and existing buildings were converted.
- 2.15 By clearly showing what land can be considered 'adjacent' to development boundaries, the development boundaries have an important role in the context of Policy TAI 10.
- 2.16 Policy TAI 1 and the Supplementary Planning Guidance Housing Mix and Type provide a framework to ensure that housing addresses the requirements of local households. This will contribute to strengthening social cohesion, an age balance in communities, and help to combat social and rural isolation.
- 2.17 No Urban Capacity Study of Villages was carried out because of their size, their role and the level of indicative growth directed to them. After identifying the indicative level of growth, we looked at how many housing units had already been built, the location of sites with current planning permission, and desktop work using GIS information, aerial photographs and local knowledge to identify 'white land'/ potential development opportunities within or adjacent to existing development. Therefore, the

development boundaries around the Villages have been drawn to facilitate housing development within and adjacent to the Villages, which will meet the housing provision for this layer of settlement in the Plan, i.e. a total of 1,479 housing units. The Councils did not wish to identify an excess of 'white land' within development boundaries of Villages, in order to avoid a situation of over-provision, skewing the strategy and therefore a failure to meet the Plan's Spatial Strategy. It must be remembered also that the housing supply includes a 10% slippage allowance, which applied across the Plan's settlements. The statistical information presented in the tables in the appendix to the Council's Statement for Hearings 2 and 3 and referred to in other site specific Hearings gives a picture of the housing supply as recorded in April 2015.

- 2.18 It is considered that the development boundaries will ensure that new development fits with the form and character of the Villages, as regards scale and location.
- 2.19 Appendix 2 to this paper includes maps for the following Villages, as examples of this layer in the Settlement Hierarchy: Aberdaron, Abererch, Bodffordd, Bontnewydd, Carmel, Cwm y Glo, Gwalchmai, Llandegfan, Llanfachraeth, Trearddur and Tudweiliog.
- 2.20 The table below sets out the position in April 2015 in terms of housing supply compared to the indicative growth level and explains 'significant' changes in the development boundaries between the different plans. These examples also include 'anomalous figures', which are also covered in the Councils' response to Action Point S3/ PG8 New windfall growth level, i.e. where the cumulative total for a Village is higher than the indicative total apportioned to it. These scenarios occur in Villages where existing development plan polices have facilitated the construction of new housing units since 2011 and continue to facilitate new housing units via extant commitments, together these amount to a higher level of growth than proposed in the emerging Plan. Annual monitoring of the Plan will enable the Councils to consider the impact of the delivery of these additional housing units on the Plan's spatial strategy.

Settlement	Notes
Aberdaron (Coastal/Rural Village)	 Indicative level = 13 Number of houses built 2011 - 2015 = 4 Number of houses with planning permission in April 2015 (commitment)= 2 Units on windfall sites = 7 Opportunities within the boundary, rural exception sites On this basis, the anticipated components of housing supply could align with the indicative level of supply apportioned to the Village.
Abererch (Loca Village)	 Indicative level = 9 Number of houses built 2011 - 2015 = 1

 Number of houses with planning permission in April 20 (commitment) = 1 Units on windfall sites = 7 Reasons for 'significant' change in development boundary - Housing allocation in the UDP removed – no planni application at the time of preparing the Deposit Plan; Land included in the eastern part of the village. Opportunities within the boundary, rural exception sites 	ng
On this basis, the anticipated components of housing supply conalign with the indicative level of supply apportioned to the Village. Bontnewydd (Service • Indicative level = 40 Village) • Number of houses built 2011 – 2015 = 1 • Number of houses with planning permission in April 20 (commitment) = 29 (including housing allocation) • Additional housing allocation = 10 On this basis, the anticipated components of housing supply components of housing s	
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align with the indicative level of supply apportioned to the Village.	
Bodffordd (Local • Indicative level = 22	
 Village) Number of houses built 2011 – 2015 = 2 	
Number of houses with planning permission in April 20	5
(commitment) = 0	
 Units on windfall sites = 20 	
 Opportunities within the boundary, rural exception sites 	
On this basis, the anticipated components of housing supply con align with the indicative level of supply apportioned to the Village.	ld
Carmel (Local • Indicative level = 12	
 Village) Housing units on windfall sites = 12 	
 Opportunities within the boundary, including opportunities redevelop site, rural exception sites 	to
On this basis, the anticipated components of housing supply co	ld
align with the indicative level of supply apportioned to the Village.	
Cwm y Glo (Local • Indicative level = 13	
 Village) Number of houses built 2011 – 2015 = 6 	
Number of houses with planning permission in April 20	5
(commitments) = 11	
A historic planning consent (since 2005), which w	as
safeguarded, was built after the Deposit Plan was prepare	
On this basis, if the housing units with extant consent are built, t	ne
anticipated components of housing supply will yield a slightly high	
number of housing units (+4) than the indicative level of sup	ly
apportioned to the Village.	
Gwalchmai (Service • Indicative level = 40	
Village)• Number of houses built 2011 - 2015 = 1	
Number of houses with planning permission in April 20	5
(commitments) = 12	

	Have been allowed from 00	
	• Housing allocation = 28 On this basis, if the housing units with extant consent are built, the anticipated components of housing supply would yield a slightly higher number of housing units (+1 unit) than the indicative level of supply apportioned to the Village.	
Llandegfan (Local	Indicative level = 27	
Village)	 Number of houses built 2011 - 2015 = 0 Number of houses with planning permission in April 2015 (commitments) = 10 (see 4.1 - 4.2) 	
	 Units on windfall sites = 17 (see 4.1 – 4.2) 	
	 Reason for 'significant' change in development boundary - Land for play/ leisure use removed as there is no scheme for the project. 	
	 Opportunities within the boundary, including opportunities to redevelop site, rural exception sites 	
	On this basis, the anticipated components of housing supply could align with the indicative level of supply apportioned to the Village.	
Trearddur	 Indicative level = 32 	
(Coastal/Rural	 Number of houses built 2011 – 2015 = 28 	
Village)	 Number of houses with planning permission in April 2015 (commitments) = 49 	
	 Sites that have had current planning permission for a number of years, but which are also in C2 flood zone, were excluded from the boundary. 	
	On this basis, if the housing units with extant consent are built, the	
	anticipated components of housing supply will yield a higher number	
	of housing units (+45 units) than the indicative level of supply	
	apportioned to the Village.	
Tudweiliog (Local	Indicative level = 12	
Village)	 Number of houses built 2011 – 2015 = 2 	
	Number of houses with planning permission in April 2015	
	(commitments) = 4	
	 Units on windfall sites = 6 One arturation within the boundary including an arturation to 	
	 Opportunities within the boundary, including opportunities to redevelop site, rural exception sites 	
	 Opportunities within the boundary, including opportunities to redevelop site, rural exception sites On this basis, the anticipated components of housing supply could align with the indicative level of supply apportioned to the Village. 	

Action Point (S15/PG2) – Llandegfan

3] Matter under consideration:

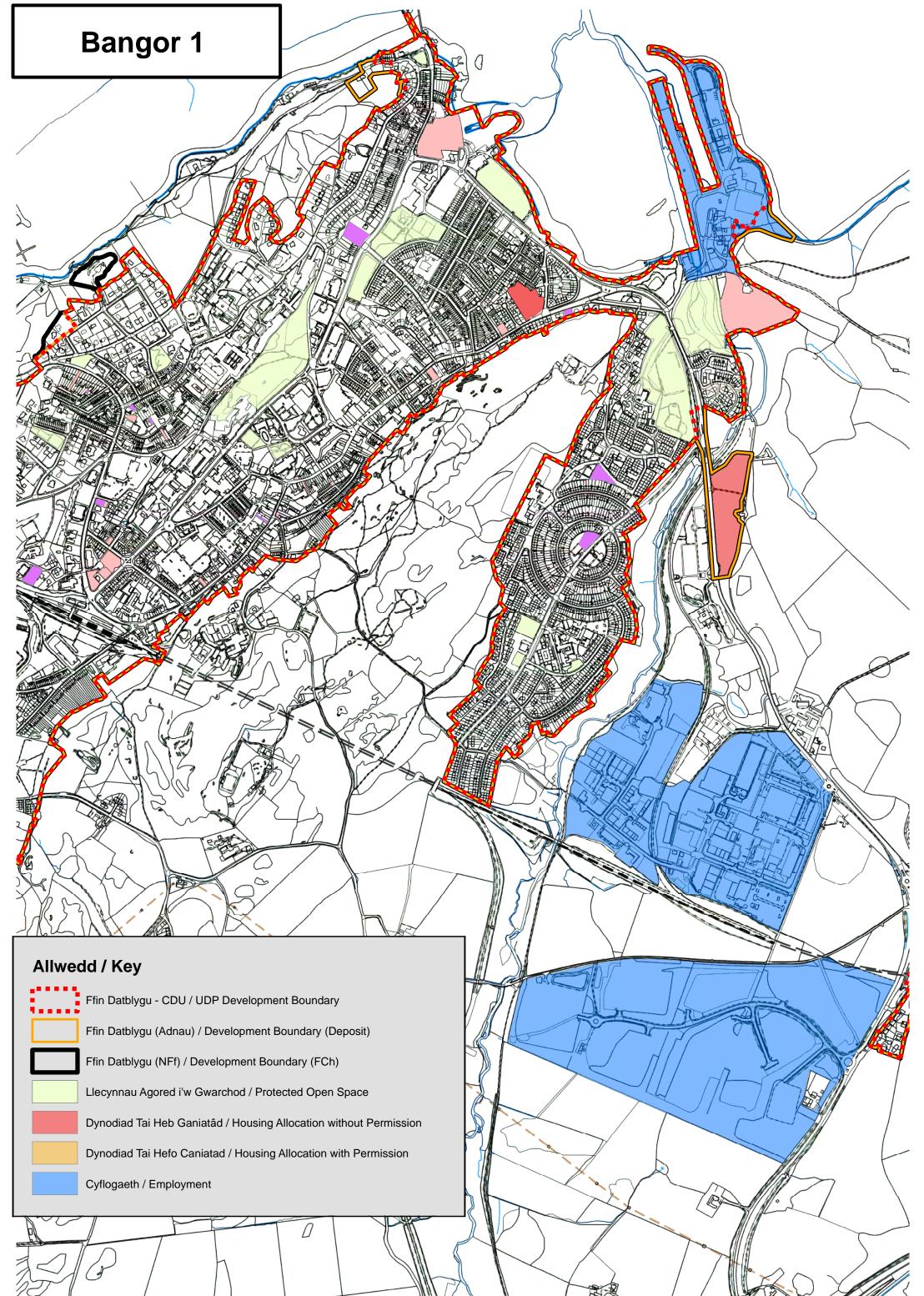
Review the information about planning consents that were referred to, include reference to it in the paper being prepared in response to Action Point S3/PG4, and present a Matters Arising Change, if required.

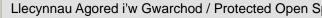
4] Councils' response

- 4.1 During Hearing 15, an objector referred to the statistics received from the Joint Planning Policy Unit, which in his view would suggest that the information in an appendix to the Council's Statement for Hearings 2 and 3 for Llandegfan was incorrect. Please see attached a copy of the information referred to by the objector in Appendix A to this paper. It was suggested that the reference to 11 units with planning permission in the Council's Statement included sites in Llandegfan and Old Llandegfan.
- 4.2 Please note that the statistics referred to by the objector were derived from the Councils' database for the **April 2016** Housing Land Availability Study. The tables in the appendices to Council's Statement refer to the **April 2015** Housing Land Availability Study. Information from this study was used rather than the one for 2016 because the 2016 study was not complete when the Statements were being prepared, i.e. all site assessments had not been recorded. On that basis, it was more appropriate to refer to the 2015 study. The table below gives details of the planning permission in April 2015, showing a total of 10 housing units in Llandegfan not 11 as set out in the Councils' Statements. The table also explains the difference between the results of the April 2015 and 2016 Studies.

Planning permission	Location	Settlement	Units April 2015	Comments
17C122H	Cefn Dolwyn/ near Iscoed	Llandegfan	1	1 unit not started in April 2016
17C490	Maldwyn House & Stores	Llandegfan	1	1 unit in process of being built in April 2016
A23D	Near Hafod Lon	Llandegfan	2	1 built between 2015 – 2016 + 1 unit in process of being built in April 2016
17C404B/DA	Hafod Wen	Llandegfan	2	2 units in process of being built in April 2016
17LPA923A/CC	Hen Ysgol	Llandegfan	4	Permission expired during 2015 - 2016
Total units with 2015	planning permission April	Llandegfan	10	

4.3 A Matters Arising Change is not required to respond to this comment. The indicative growth level for Llandegfan stays the same as recorded in Table 20, which is included in the explanatory text to Policy TAI 17





Bangor 2

Allwedd / Key

Ffin Datblygu - CDU / UDP Development Boundary

Ffin Datblygu (Adnau) / Development Boundary (Deposit)

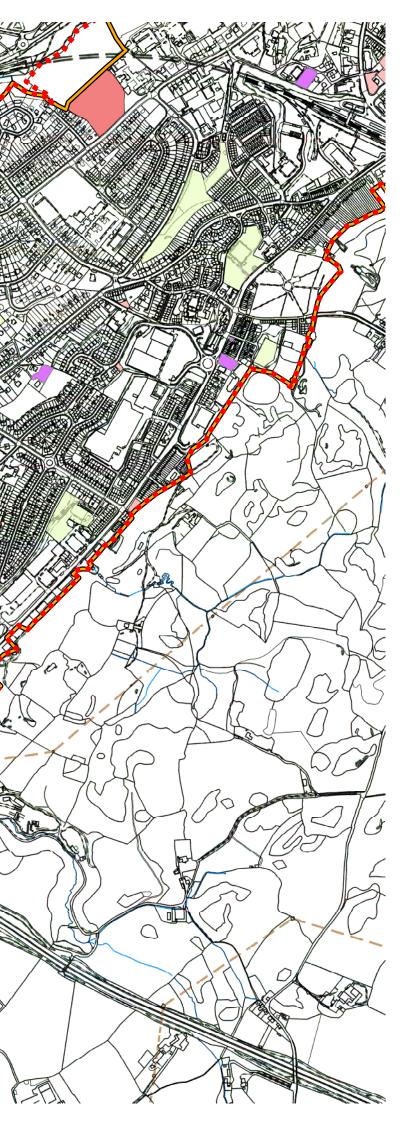
Ffin Datblygu (NFf) / Development Boundary (FCh)

Llecynnau Agored i'w Gwarchod / Protected Open Space

Dynodiad Tai Heb Ganiatâd / Housing Allocation without Permission

Dynodiad Tai Hefo Caniatad / Housing Allocation with Permission

Cyflogaeth / Employment



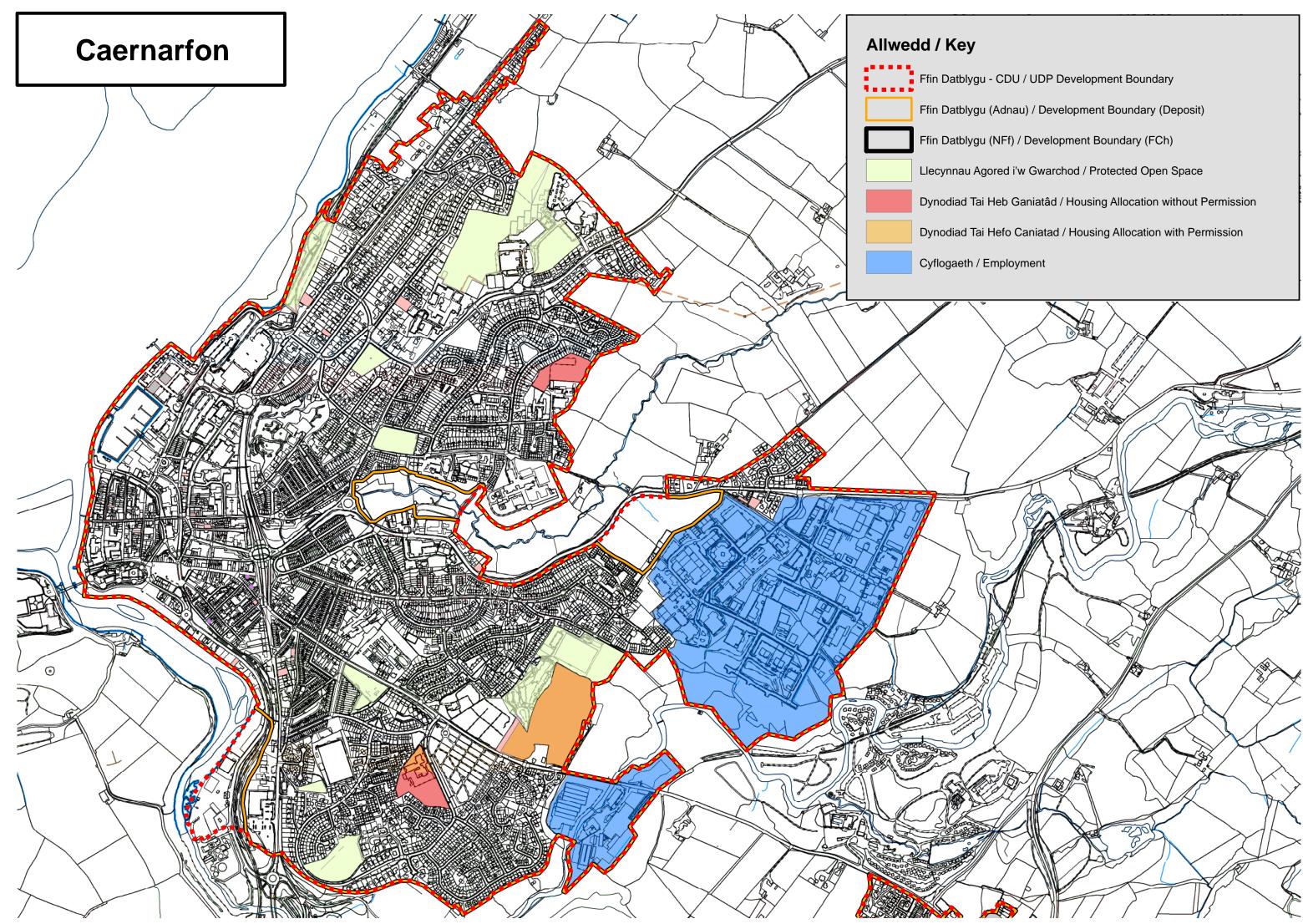
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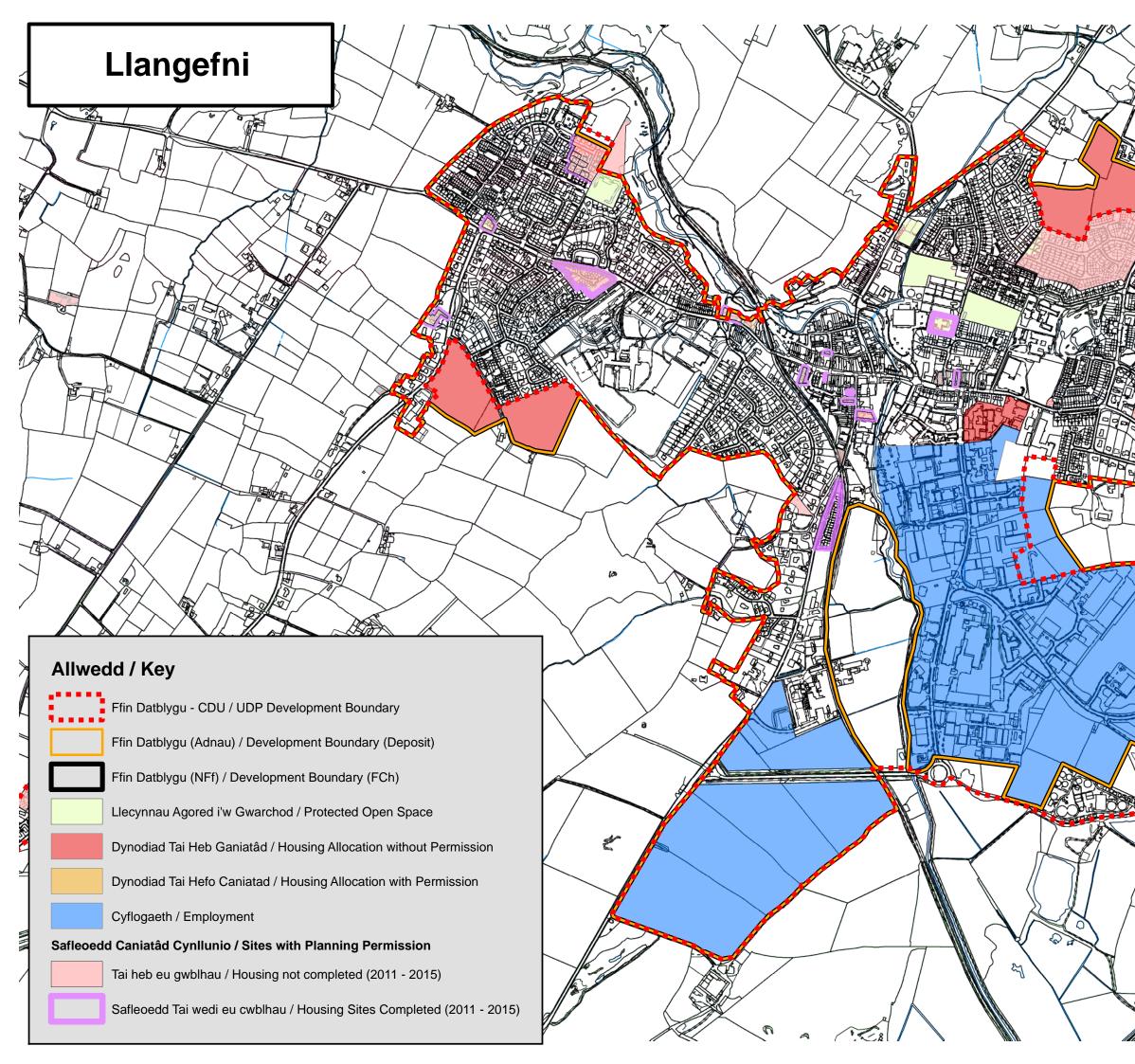
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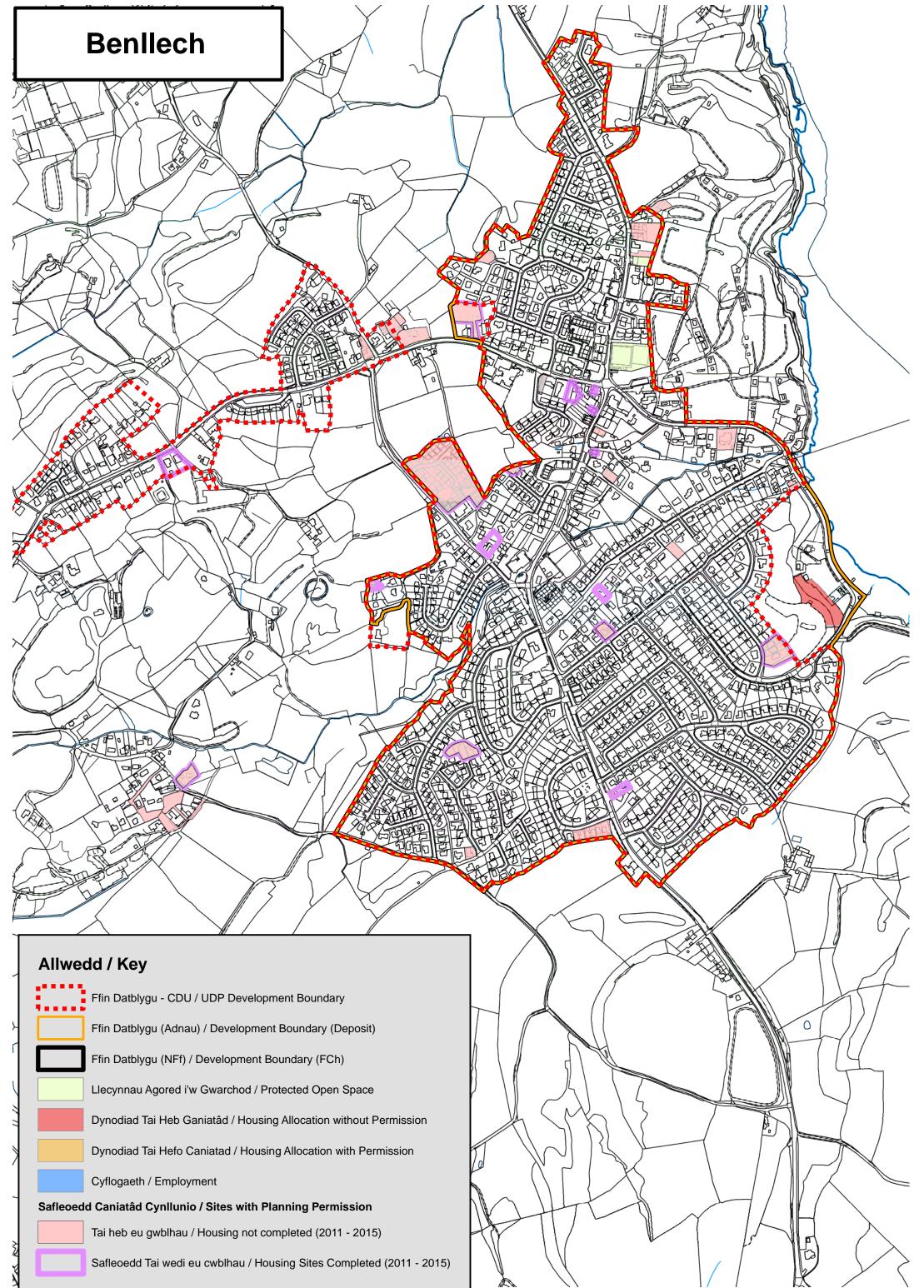
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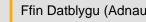
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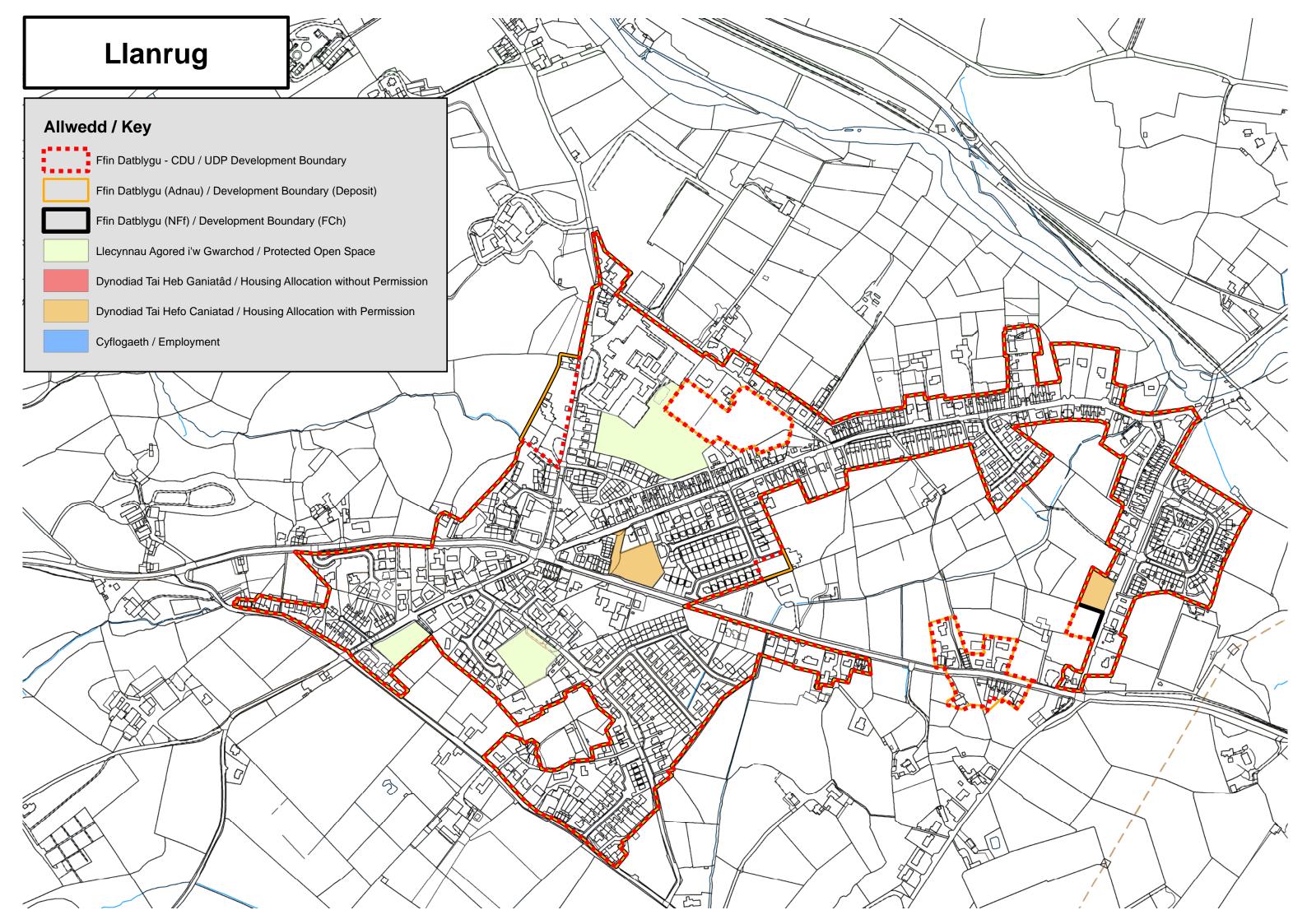






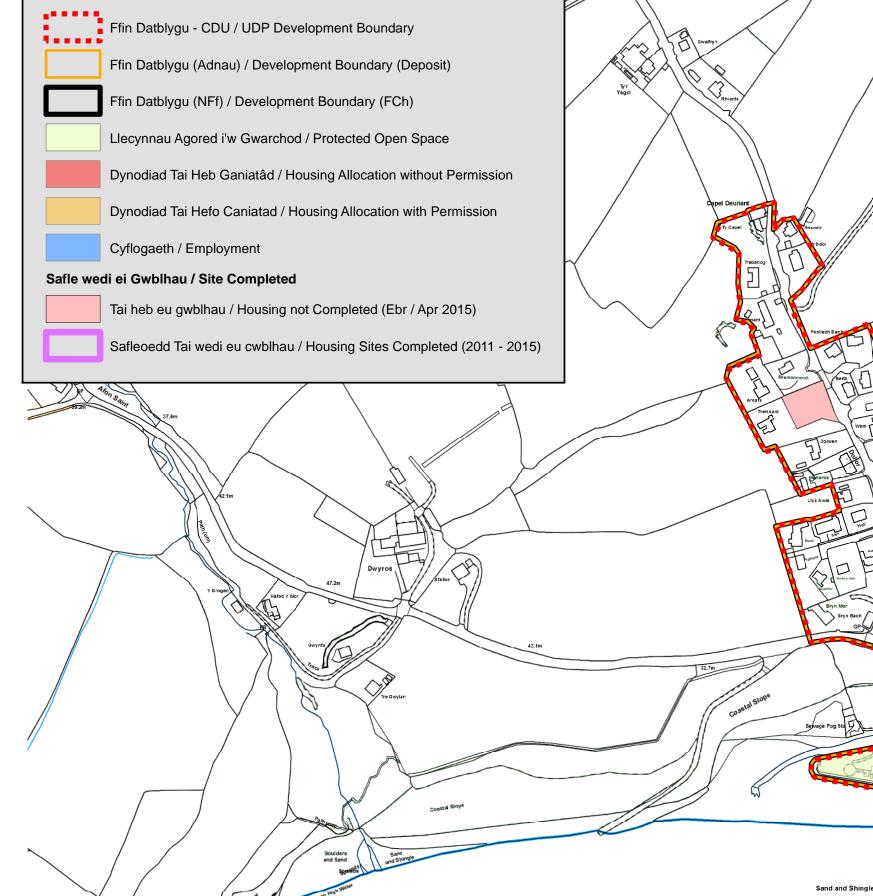






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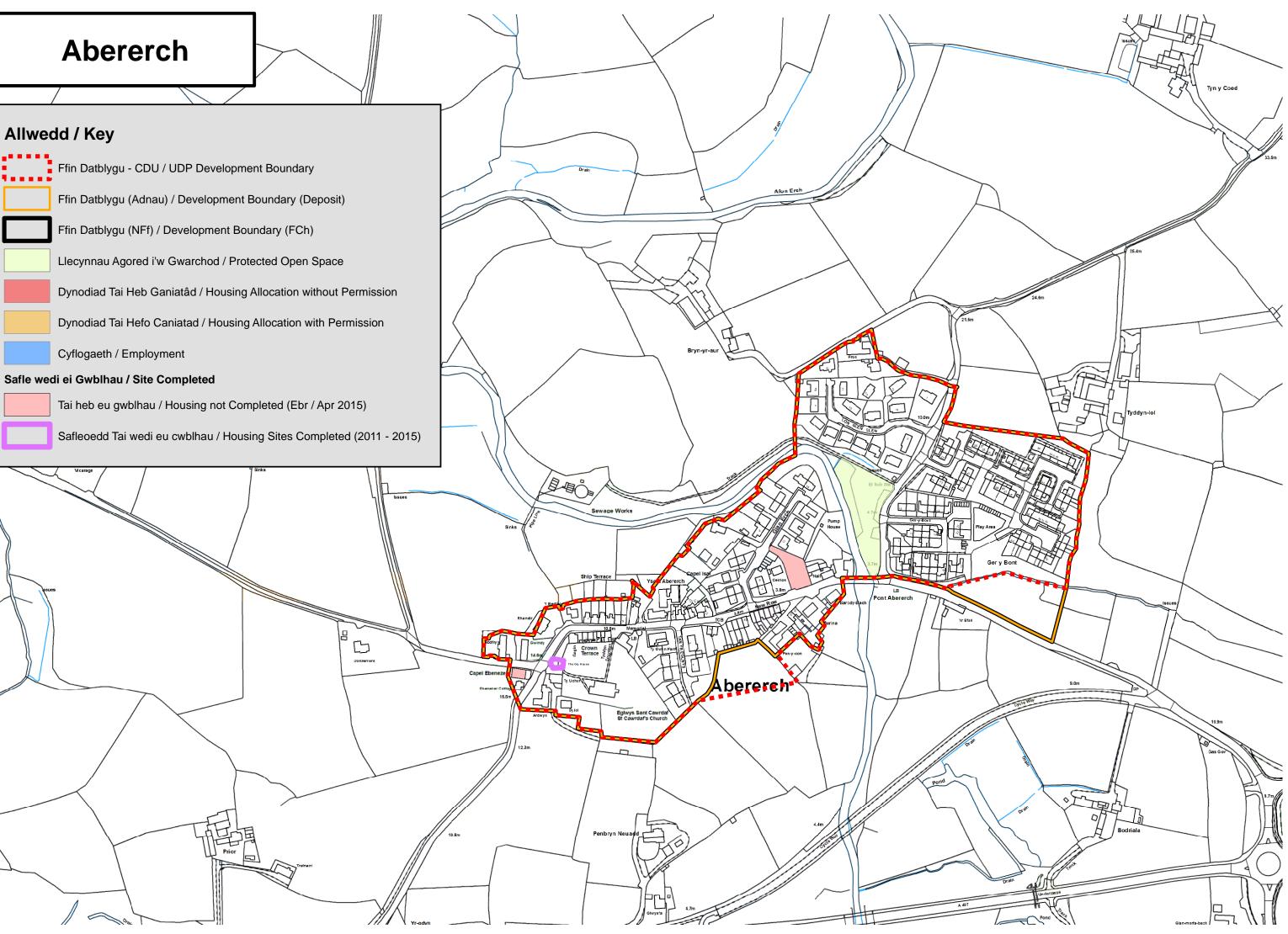
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