

**CYNGOR SIR YNYS MÔN/  
THE ISLE OF ANGLESEY COUNTY COUNCIL**

ADRODDIAD I/REPORT TO	PWYLLGOR GWAITH/ THE EXECUTIVE CYNGOR LLAWN/ FULL COUNCIL
DYDDIAD/DATE:	30.11.10 a / and 9.12.10
PWNC/SUBJECT:	POLISI TAI DROS DRO – SAFLEOEDD MAWR / INTERIM HOUSING POLICY – LARGE SITES
DEILYDD(ION) PORTFFOLIO/ PORTFOLIO HOLDER(S):	CYNG/COUN. W.J.CHOLRTON
SWYDDOG(ION) ARWEINIOL/ LEAD OFFICER(S):	PENNAETH CYNLLUNIO A GWARCHOD Y CYHOEDD/ HEAD OF PLANNING AND PUBLIC PROTECTION
SWYDDOG CYSWLLT/ CONTACT OFFICER:	BOB THOMAS UCHEL SWYDDOG CYNLLUNIO/ <i>SENIOR PLANNING OFFICER</i> (Ffôn/Tel: 2447)

1. Cadarnhewch nature yr adroddiad os gwelwch yn dda trwy roi tic yn un o'r blychau isod / Please confirm the nature of the report by ticking one of the following boxes:-

Er gwybodaeth / For information

Gweithredol / Operational

Strategol / Strategic

2. Rheswm/Rhesymau pam fod angen penderfyniad gan y Pwyllgor Gwaith / Reason/s why a decision required from the Executive

Derbyn cymeradwyaeth y Pwyllgor Gwaith i'r Polisi Tai Dros Dro Safleoedd Mawr a chefnogaeth i gyflwyno'r ddogfen i'r Cyngor Llawn i'w fabwysiadu fel Polisi Dros Dro.

*To seek the approval of the Executive for the Interim housing Policy Large Sites and support for the submission of the document to the Full Council for adoption as an Interim Policy.*

### **3. Crynodeb o'r adroddiad / Report summary**

Yn dilyn penderfyniad y Pwyllgor Gwaith ar 14-7-10 cafwyd cyfnod chwe wythnos o ymgynghoriad cyhoeddus ar y Polisi Interim Tai Safleoedd Mawr drafft.

Gwnaeth pedwar ar bymtheg o sefydliadau / unigolion gyfanswm o 74 o sylwadau. Y materion a godwyd yn y sylwadau hynny oedd y meini prawf yn y polisi yng nghyswllt pa mor bosib a hefyd i ba raddau yr oedd modd gweithredu'n ymarferol ar y cynlluniau arfaethedig, rhoddi mwy o bwysau ar y materion amgylchedd a bioamrywiaeth yn y polisi, awgrymu newidiadau bychain i adlewyrchu canllawiau polisi cenedlaethol a a oes angen gwaith asesu manwl ynghylch sgrinio cynefinoedd.

Mewn ambell achos mae'r Awdurdod Cynllunio Lleol wedi cytuno ar fân newidiadau i'r polisi drafft gyda golwg ar gyflwyno mwy o eglurder a sicrhau'r un pryd bod y polisi'n cydymffurfio gyda'r canllawiau cenedlaethol.

*Following the resolution of the Executive on the 14-7-10 the draft Interim Housing Policy Large Sites a six week public consultation exercise period was undertaken.*

*Nineteen separate organisations / individuals made a total of 74 representations. The key issues raised by representations were changes to the criteria within the policy due to concern over the viability and deliverability of potential schemes, greater weight to be given towards the environment and biodiversity issues in the policy, suggested minor changes to reflect national policy guidance and whether detailed habitat screening assessment work is required.*

*The Local Planning Authority have in certain cases agreed to minor changes to the draft policy to provide greater clarity and ensure that the policy is in line with national guidance.*

### **4. Argymhelliad/Argymhellion a'r rhesymau / Recommendation/s and reasons**

(i) Bod y Pwyllgor Gwaith yn cymeradwyo'r Polisi Interim Tai Safleoedd Mawr ac yn cefnogi'r egwyddor o'i gyflwyno i'r Cyngor Llawn ei fabwysiadu fel Polisi Dros Dro hyd oni fydd y Cynllun Datblygu Lleol wedi'i fabwysiadu.

Rheswm: Cryfhau'r Polisi Dros Dro trwy gymeradwyo ei gyflwyno i'r Cyngor Llawn ei fabwysiadu.

(ii) Rhoi'r awdurdod i'r Pennaeth Gwasanaeth (a phan fo'n briodol mewn ymgynghoriad

gyda'r Deiliaid Portffolio perthnasol) gyflwyno mân newidiadau i'w gynnwys ar ddiwedd y trafodaethau sy'n cael eu cynnal ar hyn o bryd.

Rheswm: Rydym yn dal i fod mewn trafodaethau gydag Enfusion, ein hymgynghorwyr Asesiad Cynaliadwyedd / Asesiad Amgylcheddol Strategol (AC/AAS) ynghylch rhai materion a godwyd gan wrthwynebwyr – materion na fu'n bosib eu datrys cyn ysgrifennu'r adroddiad hwn. Mae hyn yn creu ystwythder i gyflwyno mân newidiadau i'r polisi neu i'r AC/AAS.

(iii) Bod y Gwasanaeth Cynllunio yn cysylltu gyda'r Gwasanaeth Tai i benderfynu a ddylid cynnwys y Polisi Interim Tai yn yr AHDS diwygiedig.

Rheswm: Caniatáu ystwythder i gynnwys y polisi yn yr AHDS diwygiedig.

*(i) That the Executive approves the Interim Housing Policy Large Sites and supports the submission of the document to the Full Council for adoption as an Interim Policy until the adoption of the LDP.*

*Reason: To strengthen the Interim Policy by approving it's consideration for adoption by the Full Council.*

*(ii) That authority be given to Head of Service (in consultation with the relevant Portfolio Holders when appropriate) to undertake minor amendments to its contents following conclusion of ongoing discussions.*

*Reason: There are ongoing discussions with Enfusion our Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) consultants over some issues raised by objectors that it has not been able to resolve prior to writing this report. This allows flexibility for minor changes to the policy or the SA/SEA.*

*(iii) That Planning Service liaises with Housing Service to determine whether the interim housing policy should be included within a revised AHDS.*

*Reason: To allow flexibility over inclusion of the policy within a possible revised AHDS.*

## **5. Opsiynau eraill a'r rheswm/rhesymau dros eu gwrthod / Other options and reason/s for rejection**

Rhoes y Pwyllgor Gwaith sylw i'r opsiynau cyffredinol ar 14 Gorffennaf 2010.

Nid yw nifer o fân newidiadau i'r meini prawf yn y Polisi Dros Dro – newidiadau a awgrymwyd yn y gwaith ymgynghori gyda'r cyhoedd – yn cael eu derbyn gan fod yr Awdurdod Cynllunio Lleol o'r farn i'r materion hyn gael sylw digonol yn y polisi, yn y cyfiawnhad rhesymegol neu fel arall oherwydd bod digon o ystwythder ar gael i ddatrys y materion a godwyd (gweler atodiad 1 lle mae tabl o'r sylwadau a dderbyniwyd).

*The broad options were considered previously by the Executive on the 14<sup>th</sup> July 2010.*

*Numerous minor changes to the criteria within the Interim Policy suggested through the public circulation are not accepted since the Local Planning Authority feels these matters are adequately addressed in the policy or the reasoned justification or there is sufficient flexibility to address the matters raised (see appendix 1 for table of comments received).*

## 6. Ymgynghori / Consultation

- |     |  |                                     |        |                                     |          |   |
|-----|--|-------------------------------------|--------|-------------------------------------|----------|---|
| 6.1 | Cyllid/Adran 151<br>Finance/Section 151  | <input checked="" type="checkbox"/> | do/yes | <input type="checkbox"/>            | naddo/no |   |
| 6.2 | Swyddog Cyfreithiol/Monitro<br>Legal/Monitoring Officer  | <input checked="" type="checkbox"/> | do/yes | <input type="checkbox"/>            | naddo/no |   |
| 6.3 | Adnoddau Dynol<br>Human Resources  | <input type="checkbox"/>            | do/yes | <input type="checkbox"/>            | naddo/no | <input checked="" type="checkbox"/> amherth / n/a   |
| 6.4 | Gwasanaethau Eiddo<br>Property Services  | <input type="checkbox"/>            | do/yes | <input type="checkbox"/>            | naddo/no | <input checked="" type="checkbox"/> amherth / n/a   |
| 6.5 | Uned Gyfathrebu<br>Communications Unit   | <input type="checkbox"/>            | do/yes | <input checked="" type="checkbox"/> | naddo/no |   |
| 6.6 | Rhai eraill yr ymgynghorwyd â<br>nhw (yn cynnwys Aelodau)<br>Others consulted (including<br>Members) |                                     |        |                                     |          | (i) Aelod Portffolio Cynllunio /<br><i>Planning Portfolio Member</i><br>(ii) Cyfarwyddwyr Corfforaethol /<br><i>Corporate Directors</i><br>(iii) Rheolwr Gwasanaeth (Cyfreithiol) /<br><i>Service Manager (Legal)</i><br>(iv) Staff Polisi Cynllunio /<br><i>Planning Policy Staff.</i> |

## 7. Unrhyw faterion Fframwaith Polisi / Any Policy Framework issues

Dim ar hyn o bryd ond efallai y bydd, yn y pen draw, yn cael effaith ar y Cynllun Datblygu Lleol.

*Not at this stage although may ultimately affect the Local Development Plan.*

## 8. Papurau cefndirol / Background papers

Adroddiad Pwyllgor Gwaith 'Polisi Interim Tai – Safleoedd Mawrion (14-7-10).

*Executive Report 'Interim Housing Policy - Large Sites (14-7-10).*

## **1.0 Background**

1.1 A detailed report outlining the justification for an Interim Housing Policy on Large Sites was submitted to the Executive on the 14<sup>th</sup> July 2010.

1.2 At this meeting it was resolved to undertake a public consultation exercise on the policy and to report back the results of this consultation exercise.

1.3 To give the interim policy proper status it should be adopted by a resolution of the Full Council.

## **2.0 Public Consultation Exercise**

2.1 Following the preparation of the draft policy a public notice was placed in the local press. A six week consultation period followed between the 9<sup>th</sup> September, 2010 and 21<sup>st</sup> October, 2010.

2.2 Copies were also sent to the 10 public libraries, the Planning Service's reception, relevant Council Services, Council Members, Community Council's and Statutory Consultees. In addition a letter about the consultation period was circulated to the Planning Forum and Planning Agents Group.

2.3 In total 19 organisations / individuals responded making 74 separate representations.

## **3.0 Main Issues Raised**

3.1 Below are the main issues raised by responders:

- 50% Affordable housing provision is not viable in the current economic climate;
- Clarification over greater weight to brownfield sites in the policy's sequential test;
- Reference to environment and biodiversity impact should be included within the policy;
- Suggested minor changes to reflect national guidance or to provide clarity within the policy;
- The need to undertake a Habitat Regulation Assessment screening;
- Comments made on the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) document. **(currently awaiting Enfusion feedback on these matters)**

3.2 Appendix 1 to this report provides in a table format a detailed summary of all the representations made on the Interim Policy.

## **4.0 Council's Response**

4.1 In relation to the affordable housing provision the reasoned justification allowed for negotiation where the applicant had proven viability issues with delivering the expected level of provision. However to ensure compliance with

national guidance it is recommended to amend the policy to read “...**up to 50%** affordable provision...”.

4.2 An additional sentence is recommended for inclusion in paragraph 17 of the reasoned justification to clarify that preference would be given towards previously developed land which is in line with national guidance.

4.3 Reference to environment and biodiversity impact is recommended for inclusion within the policy to ensure that such matters are given due regard in dealing with any proposal.

4.4 Other minor matters that are recommended for inclusion are a site size threshold figure, identification of certain infrastructure matters, broad number of units required up until adoption of the LDP and specific mention about the AONB, landscape of historic interest, open space and flood risk issues.

4.5 The LPA does not recommend that a screening for a Habitat Regulation Assessment should be undertaken since no specific sites are identified. Without knowing the location or size of schemes that may come forward it would be impossible to undertake such an assessment. However including reference to this requirement in the reasoned justification was felt to address this matter.

**[This issue is also being discussed with Enfusion]**

4.6 The LPA does not accept the majority of minor issues raised by objectors. It was felt that these matters were addressed within the existing criteria in the policy or that the matters raised should be addressed through the LDP process.

**4.7 Awaiting feedback from Enfusion over possible changes to the SA/SEA document in light of comments made.**

4.8 Appendix 2 highlights the amended policy with recommended changes highlighted in **Bold** text.

## **5.0 Recommendations**

(i) That the Executive approves the Interim Housing Policy Large Sites and supports the submission of the document to the Full Council for adoption as an Interim Policy until the adoption of the LDP.

(ii) That authority be given to Head of Service (in consultation with the relevant Portfolio Holder(s) when appropriate) to undertake minor amendments to its content following conclusion of ongoing discussions.

(iii) That Planning Service liaises with Housing Service to determine whether the interim housing policy should be included within a revised AHDS.

## **Background Papers**

Executive Report 'Interim Housing Policy - Large Sites' (14-7-10).

Should any Member require further details or wish to view the background paper then you may contact Bob Thomas on (01248) 752 447 or via email [rwtpl@ynysmon.gov.uk](mailto:rwtpl@ynysmon.gov.uk)

### Appendix 1 - Comments on Interim housing Policy – Large Sites

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
<b>General Comments</b>			
1] Anwyl Construction Ltd.	Would benefit from an indication of the overall level of new permissions needed to meet a 5 year supply over the next 5 or more years.	Set out broadly the annual requirements based upon current commitments, any urban capacity studies report and latest Land Availability study.	Due to the age of the development plan on Ynys Mon it is the past building rate (previous 5 years) that determines the number of units required to secure a 5 year land supply. Whilst this figure will fluctuate (for the 2010 survey 1,280 units were required), the policy could be amended to indicate the broad level of units required to ensure that a 5 year supply is maintained and that this figure will be monitored annually. <b>Recommendation: Amend the reasoned justification to indicate approximate number of units required to maintain a 5 year land supply until the LDP is adopted.</b>
2] Anwyl Construction Ltd	If it were possible to set the broad locational requirements having identified the 3 main centres.	Identification of broad locational requirements	Given the circumstances that prevail in the area, i.e. potential lack of statutory 5 year housing land supply and lead in time to an adopted LDP it was considered that a criteria based approach to site selection would be more appropriate. <b>Recommendation: No change to the</b>



Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
3] CCW	Clarification required why interim policy only applies to sites of 50 or more dwellings, given that the majority of applications will be below this threshold.	Include clarification as to why the interim policy only applies to applications of 50 or more dwellings.	<b>policy.</b>
4] Boyer Planning	The definition of a large site at 50 dwellings or more is an arbitrary figure LAS classifies large sites as above 10 dwellings. In this regard there is no material difference in the context of the main settlements between a scheme of say 30 dwellings and 50 dwellings.	Schemes below the 50 threshold should be considered on their individual merits to ensure a range and choice of housing sites.	Other smaller schemes can be supported within the development boundaries under the current policy framework. The purpose of setting a comparatively high threshold was to ensure that only limited key sites would come forward on sites immediately adjacent to development boundaries. This would also ensure that small exception sites for 100% affordable housing are not lost to general market housing. <b>Recommendation: No change to the policy.</b>
5] Anglesey Aluminium Metals Ltd c/o King Sturge	Should be made explicit that the policy relates to open market housing and does not relate to residential holiday accommodation or accommodation required to house temporary workers.		It is not intended to allow holiday accommodation under this policy. The existing policy framework could allow for holiday accommodation proposal on sites adjacent to the development boundary without having to rely on this policy. Also this policy is not intended to allow a purpose built temporary workers accommodation but rather long term housing. Do not feel that it is necessary to make this explicit within the policy. <b>Recommendation: No change to the</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
<b>Justification for an Interim Policy</b>			<b>policy.</b>
6] Capita Symonds	Support Option 3 (sites outside but immediately adjoining development boundaries for the Main Centres) as it provides a logical and sustainable policy framework to guide decisions on major housing proposals in the absence of an up to date development plan.	None required.	These comments are in support of the policy and do not require any change to the policy.
7] Land & Lakes Ltd c/o Capita Symonds	Support Option 3 (sites outside but immediately adjoining development boundaries for the Main Centres) as it provides a logical and sustainable policy framework to guide decisions on major housing proposals in the absence of an up to date development plan.	None required.	
8] Trearddur Community Council	The choice of Option 3 is contrary to the very desirable objectives in the consultation document and will cause harm to cultural cohesion, the quality of the environmental and put increased pressure on local services.		The criteria within the policy should ensure that due regard is given to such matters with any application submitted. <b>Recommendation: No change to the policy.</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
9] Envirowatch UK	Object to option 2 but support a combination of Option 1 (Business as usual) and Option 3 (Edge of Main Centres).		Current policies support Option 1 whilst the interim policy delivers Option 3. In effect this meets the comment made. <b>Recommendation: No change to the policy.</b>
10] CCW	Concerned about the 'broad brush approach within this paragraph (number 12), particularly in light of the comments of the UDP Inspector in relation to land in and around Llangefni and on the edge of Holyhead.	Reference should be made within the justification as to how a sequential approach to sites within Llangefni has been considered. It should also make reference to how areas on the outskirts of Holyhead, and which have environmental constraints, have been considered in this process.	These matters should be addressed with the justification for any application that comes forward. In relation to Llangefni all of the allocated sites have been developed or have the benefit of an extant permission and the sequential test in support of the application should refer to any other openland sites within the settlement. <b>Recommendation: No change to the policy.</b>
11] Valley Community Council	Plan indicates that Valley is a secondary hub of Holyhead. Reference in paragraphs 6 to 10 for a 5 year plan UDP was a 10 year plan. Valley has sufficient earmarked Brownfield sites and does not require further development as all other land in the area is on the flood plain. Comments on the LDP enclosed.	Valley should not be seen as a secondary hub of Holyhead.	The proposed policy does not make specific reference to Valley and would not allow for development outside the Valley development boundary. The 5 year reference is towards the land supply rather than the plan period. <b>Recommendation: No change to the policy.</b>
<b>Interim Policy (General)</b>			

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
12] Jan Tyrer Planning Consultant	Current policy wording applies to both sites within the boundary as well as those adjacent to the boundary. Suggested that land allocated in the Local Plan or stopped UDP, since they have been tested over their appropriateness, should be specifically excluded in the wording of the policy.	Amend the criteria to read: “...50 or more units on sites, <b>not already allocated for housing within the Ynys Mon Local Plan or the stopped UDP, but</b> within or immediately adjacent...”	We are not aware of any Local Plan or UDP allocated site for 50 or more units that has not been developed or without the benefit of an extant planning permission. In light of this it is not felt necessary to amend the wording of the policy. <b>Recommendation: no change to the policy.</b>
13] RSPB	Reasoned justification refers to sustainability report however the policy makes no mention of the environment.	Include an additional section within the policy that states: <b>“The Council will require a Sustainability Report of proposed site. This report should include a detailed ecological report on protected species. The Council will refuse any applications that have an adverse impact upon the local environment of designated site(s).”</b> (alternatively RSPB suggest amendments to criteria (vi) and (viii) see below).	Agree that reference to the environment should be included within the policy. However, felt that this would be better through an amendment to a specific criteria rather than the inclusion of a separate section in the policy. <b>Recommendation: Add reference to Environment within criteria (vi) (see below).</b>
14] Mon a Gwynedd	Concerned that the policy as currently worded fails to	Include additional criteria suggestions being:	Having reviewed National Planning Guidance and the Climate Change

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Friends of the Earth	incorporate sufficiently proposals contained within the Climate Change Strategy for Wales (Oct 2010).	'(viiia) The proposal incorporates a community scale renewable energy generation project unless, having considered all the relevant factors, this is not feasible' and '(ixb) The proposal demonstrates that key services and facilities (e.g. medical services, open spaces) will be incorporated in order to reduce traffic movements.'	Strategy for Wales agree that an additional criteria should be included within the policy to specifically address Climate Change issues. However, feel that this should be more generic in nature rather than a reference to a specific element as suggested by this representation. <b>Recommendation: Add a criteria in the policy and an additional paragraph in the reasoned justification.</b>
15] CCW	Concerns over the criteria based approach which fails to provide any indication of the areas of land likely to be available for development or the housing numbers likely to be available.	A policy that allocates sites would meet the requirements of providing a 5 year land availability figure and provide greater certainty to developers and local residents.	Detailed assessment of sites will be undertaken as part of the LDP process. It was felt that for the interim period a criteria based policy with the onus on the application to provide the necessary assessment work would be the preferred option. <b>Recommendation: No change to the policy.</b>
16] CCW	If the Council implements a criteria based approach then an additional criteria on biodiversity, open space and rights of way network should be included.	Add a criteria that states: <b>"Significant harm should not be caused to biodiversity interests and linkages, and that schemes maintain or provide adequate access to usable and</b>	Agree over the need to include reference to biodiversity interests and linkages within the policy. Reference towards TAN16 'Sports, Recreation and Open space' (2009) to be included in the reasoned justification. Policy TR9 &

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
		<p><b>accessible public open space and the rights of way network.”</b></p>	<p>TO10 in the stopped UDP protects and promotes the rights of way network. These policies would be material considerations in dealing with any application submitted under the interim policy. In light of this it is not felt necessary to include this matter within the policy.</p> <p><b>Recommendation: Amend criteria (vi) through reference to biodiversity and refer to open space in the reasoned justification.</b></p>
<p>17] Boyer Planning</p>	<p>Add additional criteria to reflect paragraphs 9.2.6, 9.2.8 to 9.2.10 of PPW which defines a search sequence for housing sites and sites no longer needed for industrial purposes. This would better define the sequence that the policy seeks to encourage and afford priority to previously developed land where this is appropriate.</p>	<p>Add in the following criteria:  <b>“(i) Previously developed land suitable for housing use will be considered in the first instance.”</b> and  <b>“(ii) Redundant or obsolete employment sites or allocations will be considered suitable for housing where there is evidence that they are no longer required to be protected for employment uses.”</b></p>	<p>Agree that additional information should be within the policy regarding the sequential test. However, feel that this should be explained in the reasoned justification rather than through additional criteria.</p> <p><b>Recommendation: Amend the reasoned justification to state preference for previously developed land and reference to obsolete employment sites.</b></p>
<p>18] Environment Agency</p>	<p>Should also include that proposals not be located within flood risk areas and must not cause or</p>		<p>Policy SG2 in the stopped UDP refers to Development and Flooding. This policy would be a material</p>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	increase on or off-site flood risk.		consideration in dealing with any application submitted under the interim policy. In light of this it is not felt necessary to include this within the policy but rather for the purpose of clarity amend the reasoned justification to refer to this matter. <b>Recommendation: Amend paragraph 28 through reference to flood risk areas.</b>
19] Anglesey Aluminium Metals Ltd c/o King Sturge	The introductory paragraph to the policy should also include a site area threshold.	Suggest a site area of 1 hectare.	Agree to include site area threshold to provide clarity within the policy. However in light of the UDP density figures of 30 dwellings per hectare suggest a site area of 1.5 hectare or more. <b>Recommendation: Amend the introduction and policy to include site area threshold.</b>
20] Beaumaris Town Council	The policy should make reference to potential Large Sites elsewhere. Felt that reference should be made to the former Lairds site at Llanfaes, Beaumaris.	Include reference to the former Lairds site, Llanfaes, Beaumaris.	Paragraph 12 gave the justification over the selection of the 3 settlements within this policy. In light of this it is not felt appropriate to extend the policy to other settlements until detailed LDP work has clarified the Plan's Preferred Strategy. <b>Recommendation: No change to the policy.</b>

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<b>Interim Policy Criteria (i) – Sequential Test</b>			
21] Anwyl Construction Ltd	If only limited brownfield sites identified in an urban capacity study then the sequential test would be of limited value/weight.	Criteria should state 'No sequentially preferential sites available'	Reference to sequential test addresses this matter and allows for consideration over any more recent brownfield opportunities that have become available. <b>Recommendation: No change to the policy.</b>
22] Mon a Gwynedd Friends of the Earth	Concerned that the policy as set out readily accepts the need for greenfield development contrary to guidance in paragraph 9.2.7 of Planning Policy Wales. Also future housing requirement projections fail to account the current economic circumstances. Example given of the issue in Ireland with numerous empty homes.	Amend criteria (i) to read: "...to show <b>(a) that there is very likely to be adequate demand for such a development and (b) that a detailed sequential test has been strictly applied...</b> " "...within the settlement <b>and no suitable brownfield sites in the vicinity.</b> "	The sequential test within the policy ensures that regard will be given towards brownfield opportunities. The criteria that seeks to ensure proposals are phased in line with employment opportunities should ensure that there is adequate demand for such development. <b>Recommendation: No change to the policy.</b>
23] Local Landowner c/o Owen Devenport Ltd	Purpose of the policy is to allow the release of sites not within development boundaries, with assumptions over this throughout the document e.g. paragraph 16. Also all available land would of have been allocated in the UDP with a tight development boundary	Feel that a sequential test is probably unnecessary.	The sequential test is introduced to have regard to possible changes in circumstances since the UDP was prepared. <b>Recommendation: No change to the policy.</b>



Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	to prevent Greenfield sites.		
24] Anglesey Aluminium Metals Ltd c/o King Sturge	Minor changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Amend criteria to read: "...to show that <b>in the absence of specific and identifiable special circumstances or regenerations benefits</b> , a sequential test..."	The justification for the interim policy is to maintain a 5 year land supply. It has not been prepared to justify regeneration proposals which could provide a level of provision above that required to maintain a 5 year land supply. <b>Recommendation: No change to the policy.</b>
<b>Interim Policy Criteria (ii) – Affordable Housing provision</b>			
25] Anwyl Construction Ltd	50% is the figure in the Affordable Housing Delivery Statement (AHDS) but it does not have evidence to support this as a viable target.	Recommend that this % is reconsidered following a viability study or caveat this that the LPA would be prepared to consider alternative % subject to viability appraisal etc.	Paragraph 18 in the reasoned justification does provide a methodology if an applicant questions the viability of providing 50% affordable provision. This could justify a lower rate of provision on a particular site. <b>Recommendation: No change to the policy (recommended change to</b>
26] Capita Symonds	Object to expected level of provision and contribution which is being sought. High targets were set when the housing market was buoyant and there have been significant changes since then.	Doubt whether 50% contribution is achievable. Even the UDP target of 30% has to be called into question. A lower figure should be included within the interim policy.	
27] Land & Lakes Ltd c/o Capita Symonds	Object to expected level of provision and contribution which is being sought. High targets were set when the housing market was	Doubt whether 50% contribution is achievable. Even the UDP target of 30% has to be called into question. A lower figure should be	

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	<p>buoyant and there have been significant changes since then. It is also noted that over 50% of the existing housing stock in Holyhead is within bands A, B and C having a market value of less than £91,000. Contended that there is no justification for the high level of 50% affordable housing to be provided as part of this interim policy.</p>	<p>included within the interim policy.</p>	<p><b>objection 29 below partly responds to these objections).</b></p>
<p>28] Local Landowner c/o Owen Devenport Ltd</p>	<p>No social, economic or viability argument to justify a 50% affordable provision. No such target in the Local Plan or the UDP. Viability is a key issue for the developer in providing affordable dwellings.</p>		<p>This target is included within the adopted Affordable Housing Delivery Statement (AHDS) 2009. Paragraph 18 in the reasoned justification does provide a methodology if an applicant questions the viability of providing 50% affordable provision. This could justify a lower rate of provision on a particular site. <b>Recommendation: No change to the policy (recommended change to objection 29 below partly responds to this objection).</b></p>
<p>29] Anglesey Aluminium Metals Ltd c/o</p>	<p>Specific concerns about affordable housing requirements as set out in criterion (ii). In accordance with</p>	<p>Amend the criteria to read: “<b>In developments of housing available to the open market an</b></p>	<p>To ensure consistency between the wording of the policy and the approach advocated in the reasoned justification</p>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
King Sturge	government guidance the provision of affordable housing should be expressed as a target rather than an absolute figure.	affordable housing provision of <b>up to 50%</b> is provided..."	amend the wording in the policy to state that the Council will seek to negotiate up to 50% affordable provision. <b>Recommendation: Amend criteria (ii) to reflect this approach.</b>
30] Cyngor Cymuned Llanddyfnan	How will the Council ensure a 50% provision by developers?		Similar to thresholds in current policies the Council will seek to negotiate an element of affordable provision. As with all applications that trigger an affordable housing requirement it will be a case of balancing viability against deliverability. <b>Recommendation: No change to the policy.</b>
31] An Anglesey Resident (A)	How will the Council ensure a 50% provision by developers? It has been difficult in the past to obtain 30% affordable housing provision.		
<b>Interim Policy Criteria (iii) – Phasing</b>			
32] Anwyl Construction Ltd	Very difficult to apply and operate.	Needs an employment opportunities programme etc and ability to link number, types and location of houses to actual / proposed number, type and location of jobs including travel distances/modes etc.	It is acknowledged that prior to a comprehensive employment review, which will be prepared for the LDP it is difficult to fully justify the phasing of a particular scheme. However the Local Planning Authority (LPA) feel that this matter should be addressed with an application that may come forward under this policy. There may well be certain cases where the need for additional housing to maintain a 5 year supply carries greater weight than
33] Local Landowner c/o Owen Devenport Ltd	Attempting to link housing growth with employment growth is a laudable principle. However in the context of this policy, which seeks to address a pressing shortfall in	It is submitted that the lack of a 5-year housing supply is sufficient in its own right to encourage the release of strategic sites.	

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	housing land supply, this aim would be an unnecessary burden which would act to reduce the supply of land brought forward by the policy.		phasing a scheme with employment opportunities which may have slightly longer term needs. <b>Recommendation: No change to the policy.</b>
34] Anglesey Aluminium Metals Ltd c/o King Sturge	Changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Delete the criteria.	
<b>Interim Policy Criteria (iv) – Infrastructure</b>			
35] Anwyl Construction Ltd	Needs a definition of infrastructure and prior consultation and programme from infrastructure providers rather than consulting on each and every application.	Have an idea of where infrastructure is planned / required and get something in place ahead of planning applications.	This work will be undertaken as part of the LDP process. In order to facilitate schemes prior to the LDP process it is felt appropriate to seek the applicant to undertake such work. <b>Recommendation: No change to the policy.</b>
36] Environment Agency	Should include reference to adequate provision of water supply, foul and surface water drainage facilities (also to be emphasised in paragraph 21). For Greenfield sites it must be demonstrated that additional surface water generated as a result of development can be		It is felt that reference to infrastructure within the criteria is sufficient but to amend paragraph 21 in the reasoned justification to provide greater clarity. <b>Recommendation: No amendment to criteria (iv), but to amend paragraph 21.</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	attenuated to Greenfield run-off rate.		
<b>Interim Policy Criteria (v) – Contribution to 5 year Land Supply</b>			
37] Anwyl Construction Ltd	Not sure of relevance to Housing Land Availability Supply.	Better to simply say permissions expected to yield completions by certain date so it does contribute.	This criteria seeks to ensure that the proposal is required to maintain a 5 year land supply. The annual Land Availability Study allows the Local Planning Authority to consider the need or otherwise for additional sites to maintain a 5 year land supply. <b>Recommendation: No change to the policy.</b>
38] Local Landowner c/o Owen Devenport Ltd	The intent of this criteria is that it seeks to allow the Council to refuse speculative applications, however it should be clear within the document that sites such as Ty'n Coed comply with this criteria.		Without the relevant evidence and justification it is premature to state that particular sites comply with the criteria within this policy. <b>Recommendation: No change to the policy.</b>
39] Anglesey Aluminium Metals Ltd c/o King Sturge	Minor changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Amend the criteria to read: <b>“Where proposals cannot demonstrate a specific regeneration benefit or be justified by special circumstances, proposals can be...”</b>	The justification for the interim policy is to maintain a 5 year land supply. It has not been prepared to justify regeneration proposals which could provide a level of provision above that required to maintain a 5 year land supply. <b>Recommendation: No change to the</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			policy.
<b>Interim Policy Criteria (vi) – Landscape Impact</b>			
40] Anwyl Construction Ltd		Should read “...no unacceptable impact...”	Amending the policy in line with the recommended change would ensure that the policy is in line with national guidance. <b>Recommendation: Amend the criteria in line with the suggested change.</b>
41] RSPB	Reasoned justification refers to sustainability report however the policy makes no mention of the environment.	Amend to read “...in terms of landscape <b>and environment</b> impact...”. (see alternative suggestion above)	Agree that reference should be made to environment impact within this criteria. <b>Recommendation: Amend criteria in line with suggested change.</b>
42] CCW	If the Council implement a criteria based approach then reference should be made to the Area of Outstanding Natural Beauty (AONB) and the Landscape of historic Interest.	Include reference to these in this criteria.	The existing policy framework addresses these matters. Felt that such matters should be referred to in the reasoned justification. <b>Recommendation: Amend the reasoned justification.</b>
43] Anglesey Aluminium Metals Ltd c/o King Sturge	Minor changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Amend criteria to read: “...landscape impact <b>having taken into account the regeneration benefits and special circumstances justifying and development, and the ability or otherwise to mitigate any landscape impacts that may</b>	Other criteria within the policy provide justification for the proposal and it is not felt necessary to include this within this particular criteria. Due to the justification for the interim policy recommended that reference to regeneration issue not be included within the policy (see response to

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
		occur.”	objection 24 above). <b>Recommendation: No change to the policy.</b>
<b>Interim Policy Criteria (vii) – Sustainable Homes</b>			
44] Anwyl Construction Ltd	Difficult to apply and operate. PPW enables LPA to set a higher level for strategic sites.	Need to define strategic sites and justify why higher level and subject to viability.	Whilst this matter is a repeat of National guidance the importance of the issue in relation to climate change meant that it is included within the policy. To ensure consistency between the approach advocated in the reasoned justification and the approach within the policy it is recommended that the criteria be re-worded in line with the suggested change. <b>Recommendation: Amend the policy in line with the suggested change.</b>
45] Local Landowner c/o Owen Devenport Ltd	The criteria is a repeat of National requirement. It appears as being unreasonable in respect of the viability of the highest possible level and lack of clarity of what level this constitutes.	Unnecessary and should be deleted from the policy prior to adoption as it repeats provisions with PPW.	
46] Anglesey Aluminium Metals Ltd c/o King Sturge	Minor changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Amend the criteria to read: <b>“Having regard to the viability of the scheme and practical implications of doing so, the proposed housing should seek to achieve the highest possible...”</b>	
<b>Interim Policy Criteria (viii) – Social, Linguistic and Cultural cohesion</b>			
47] Anwyl Construction Ltd	Without robust evidence of vulnerability in respect of social, linguistic and cultural cohesion it is difficult to assess impact of specific proposals. Does the LPA require similar impacts for other forms of development?		The adopted SPG on Planning and the Welsh Language (2007) by the LPA provides guidance on the potential impact of a development on the community and what mitigation is proposed to lessen any identified impact. Other forms of development are

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			also included within the methodology. <b>Recommendation: No change to the policy.</b>
48] RSPB	Reasoned justification refers to sustainability report however the policy makes no mention of the environment.	Amend to read "...the <b>local environment or</b> the social, linguistic or cultural cohesion..." (see alternative suggestion above).	Agreed to the inclusion of reference to the local environment within criteria (vi), see above. Do not feel that it is appropriate to also include it within this criteria. <b>Recommendation: No change to the policy.</b>
49] Local Landowner c/o Owen Devenport Ltd	This is unnecessary and should be deleted from the policy as it repeats provisions within PPW and TAN 20 and the existing Local Planning framework.		Whilst this issue is contained in National guidance and the stopped UDP since this scale of development would trigger a full Linguistic Impact assessment it was felt appropriate to contain the issue within the policy. <b>Recommendation: No change to the policy.</b>
50] Anglesey Aluminium Metals Ltd c/o King Sturge	Minor changes are required to ensure alignment with National Policy and to ensure that it is effective in maintaining a 5 year supply on the Island.	Amend the criteria to read: " <b>A Welsh Language Impact assessment should be undertaken to assess the impact of the</b> social, linguistic..."	Clarification is provided within the reasoned justification over the use of a Language Impact Assessment. Leaving the criteria in its current format will allow for any other evidence the applicant may wish to submit in support of any application. <b>Recommendation: No change to the policy.</b>



Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
51] An Anglesey Resident (A)	There has been a high level of development in Llangefni over the past decade. To protect the level of Welsh speakers in Llangefni new large developments should be prevented.		Without the relevant evidence and justification to consider the merits of a particular scheme it is premature to state that development should not occur in a particular settlement. <b>Recommendation: No change to the policy.</b>
52] Cyngor Tref Amlwch	This should have priority. It is a contradiction in terms you cannot have a large site without a detrimental effect.		This criteria seeks evidence from the applicant over any possible impacts of a scheme and clarification over any mitigation measures felt to be necessary. Would not agree that large sites automatically have a detrimental effect on a community. <b>Recommendation: No change to the policy.</b>
<b>Interim Policy Criteria (ix) – Mix and Type of Housing</b>			
53] Capita Symonds	A 50% on site contribution / provision of affordable housing would 'unbalance' an appropriate mix of house types necessary to reflect the needs of the community.	Nothing suggested.	Meeting the affordable needs of an area would go some way towards meeting the needs of the community. Regard would be given towards the balance between the need for affordable housing provision and the mix and type of housing required to meet the wider needs of the community. <b>Recommendation: No change to the</b>
54] Land & Lakes c/o Capita Symonds	A 50% on site contribution / provision of affordable housing would 'unbalance' an appropriate mix of house types necessary to	Nothing suggested.	

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	reflect the needs of the community.		<b>policy.</b>
55] Local Landowner c/o Owen Devenport Ltd	Policy does not make it clear how this would be established, and it is difficult to see how this could be determined for the open market element of the site. Attempts to control the housing delivered on the open market element of a site would have the potential to undermine site viability.		Whilst it is not anticipated that the LPA will determine the detailed mix of units proposed on a site but rather an opportunity for the applicant to demonstrate how regard has been given towards the needs of the community when designing the scheme. <b>Recommendation: No change to the policy.</b>
<b>Reasoned Justification</b>			
56] Anglesey Aluminium Metals Ltd c/o King Sturge	Supports the use of settlement boundaries as defined in the stopped UDP.		These comments are in support of the policy and do not require any change to the policy.
57] Mon a Gwynedd Friends of the Earth	Paragraph 17 takes insufficient account of the priority that should be given to brownfield sites according to Planning Policy Wales.	Amend paragraph 17 to read; "Planning Policy Wales indicates that Greenfield developments are generally inappropriate within Wales, and any opportunities afforded by this policy for development on greenfield sites should therefore be subject to strict and detailed application of a sequential test in order to	Agree that there should be a statement within the reasoned justification stating that the LPA's preference would be for the use of Brownfield opportunities under the sequential test approach advocated within the policy. <b>Recommendation: Amend paragraph 17 to highlight preference to brownfield sites under the sequential test approach.</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
		demonstrate absence of brownfield sites within, adjacent to or in close proximity to the development boundary.”	
58] Boyer Planning	In Paragraph 17 reference to obsolete employment allocations is too narrow as there are equally obsolete employment sites that have vacant buildings that no longer serve as suitable sites for this purpose.		Agree that obsolete employment sites should be highlighted as being preferable to Greenfield opportunities under the sequential test approach. <b>Recommendation: Amend paragraph 17 to make reference to obsolete employment sites.</b>
59] Local Landowner c/o Owen Devenport Ltd	Paragraph 18 – disagree with the requirement for the developer to pay for ‘independent specialist’ analysis of viability work. Felt such expertise should exist within the Council’s Property Section.		The Planning Service would have to purchase either internal or external expertise to analyse any viability figures submitted to justify a reduced level of planning gain from a proposal. It is felt that it is reasonable for the service to charge the applicant for this work. An alternative could be for the applicant and the LPA to agree to an independent organisation to undertake a study thereby negating the need for a second opinion. <b>Recommendation: No change to the policy.</b>
60] Cyngor Cymuned	Paragraph 19 refers to the Empty Homes Strategy, this strategy		The Council have recently adopted an Empty Homes Strategy. Whilst the

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
Llanddyfnan	should be given priority over this Large Sites Strategy with an emphasis on reuse of empty homes.		importance of this strategy is acknowledged the anticipated rate of dwellings that will be returned to the housing stock through this process will be limited, and in our opinion would not address the shortfall in the 5 year land supply.
61] An Anglesey Resident (A)	Paragraph 19 refers to the Empty Homes Strategy this strategy should be given priority over this Large Sites Strategy with an emphasis on reuse of empty homes.		<b>Recommendation: No change to the policy.</b>
62] Cyngor Tref Amlwch	Paragraph 18 & 26 is ambiguous. Paragraph 14, 24, 26 & 27 – If legally not able to specify local labour, language etc, how is it possible to achieve the matters in these paragraphs.		The assessment studies contained within these paragraphs are being submitted on current applications that trigger their requirement. This allows the LPA to judge whether there is an adverse impact and if sufficient mitigation has been provided. <b>Recommendation: No change to the policy.</b>
63] RSPB	Paragraph 27 refers to a Sustainability Report but no detail over its content. Due to designated sites and/or protected species being adjacent to all 3 centres a comprehensive ecological survey should be part of such a report (if an EIA is not	Amend paragraph 27 to include “...This report should include a detailed ecological report on protected species. The Council will refuse any applications that have an adverse impact upon the local environment of designated site(s).”	Agree to amend the paragraph for the purpose of clarity. <b>Recommendation: Amend paragraph 27 in line with suggested change. [Consider including reference to EIA in the reasoned justification]</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	required).		
64] CCW	Unclear whether a screening for a Habitat Regulations Assessment (HRA) in line with Regulation 102 of the Conservation of Habitat and Species Regulations 2010 has been undertaken.	Either a HRA screening is undertaken at the first opportunity or if undertaken should be clearly stated in the Reasoned Justification.	Regulation 102 of the Conservation of Habitat and species Regulations 2010 refers to Land use plans, whilst this document introduces a criteria based interim policy. Since no specific sites are identified under the proposed policy it is difficult to undertake a HRA screening without knowing the location or size of schemes that may come forward under the policy. However, to ensure compliance with the Regulation the LPA agree to amend the reasoned justification to ensure that any application submitted undertakes such work. <b>Recommendation: Amend the reasoned justification to clarify that any application should have regard to HRA screening requirements. [Currently discussing matter with Enfusion]</b>
65] Holyhead Town Council	Consideration should be made to introducing planning gain under the Section 106 agreement for the benefit of the local community in relation to large sites.		Paragraph 29 does state that the LPA may seek additional planning gain from any proposal in line with National policy and the Council's planning gain SPG. <b>Recommendation: No change to the</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			policy.
<b>Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)</b>			
66] Capita Symonds	Support Option 3 since it is the most sustainable option which concentrates major development in or adjacent to key settlements. As well as assisting regeneration it provides a logical policy led approach to determining major residential proposals in the absence of an up to date adopted development plan. Development and expansion of other settlements needs to be informed by an inclusive community engagement as part of the LDP process.	None required.	These comments are in support of the policy and do not require any change to the policy.
67] Land & Lakes Ltd c/o Capita Symonds	Support Option 3 since it is the most sustainable option which concentrates major development in or adjacent to key settlements. As well as assisting regeneration it provides a logical policy led approach to determining major residential proposals in the absence of an up to date adopted development plan. Development	None required.	

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	and expansion of other settlements needs to be informed by an inclusive community engagement as part of the LDP process.		
68] Envirowatch UK	Option 1 is ambiguous, very misleading, not clear and precise as to good and bad and clarify why, as how does more housing in urban areas cause dispersed communities to more vehicle trips when it is sustainable. Therefore object to the SA/SEA.		<b>[discuss comment with Enfusion]</b>
69] CCW	UDP Inspector noted a number of openland sites within the Development Boundary of Llangefni that should be developed before sites on the periphery.	If such sites have not been developed would expect to see these as one of the alternative scenarios: 'The development of openland within Llangefni and an associated sequential approach to development for the town.'	The LPA are not aware of significant openland sites in Llangefni. However, suggested amendment to reasoned justification will highlight priority for brownfield sites in sequential test. <b>Recommendation: No change to the policy.</b>
70] CCW	Although the AONB is mentioned in connection with 'Evidence and Reference' in respect of SA objectives for Biodiversity, there is no reference to it in respect of landscape objectives.	No recognition of the impacts of the preferred policy option on the AONB.	<b>[check this matter with Enfusion]</b>
71] CCW	Little mention is made of		<b>[check this matter with Enfusion]</b>

Number / Name	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	Geodiversity. Ynys Mon is now a Geopark and recognition of the importance of this to the area should have been made in the SEA.		
72] CCW	Whilst welcoming the suggested mitigation and enhancement measure for Option 3 biodiversity SA objectives would remind the LPA that our duties extend beyond the boundaries of SSSIs and that this should be reflected in the SEA of the policy.		<b>[check this matter with Enfusion]</b>
73] Environment Agency	Objective 5 Climate Change does not consider climate change in terms of its effect on the 'lifetime of developments'. As part of the Flood Consequence Assessment process the period of time over which the implications of climate change are considered is required.		<b>[check this matter with Enfusion]</b>
74] Valley Community Council	Object to the complex content of the report.	Suggest that Community councils be given a summary of the SA report in layman's terms.	<b>[discuss this matter with Enfusion]</b>



Interim Housing Policy – Large Sites

Background

1. This is an interim housing policy to ensure that the Local Planning Authority maintains a 5 year housing land supply until the Ynys Môn Local Development Plan (LDP) is adopted. At present it is envisaged that a LDP will be adopted in 2016.
2. Current Housing Policies in the development plan (Ynys Môn Local Plan 1996 & Gwynedd Replacement Structure Plan 1993) as well as the stopped UDP 2005 will still be given weight as a material consideration in dealing with current applications. This interim policy will only apply to applications of 50 or more dwellings **or a site area of 1.5 hectare or more**. The policy will be a material consideration and the weight attached when dealing with appropriate applications will depend upon other material considerations that may be applicable in each individual case.

Justification for an Interim Policy

3. Guidance in Planning Policy Wales (PPW) (2010) clearly states the need to maintain a 5-year supply of land for housing:  
  
*“Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan.” (paragraph 9.2.3, PPW 2010)*
4. Further guidance is provided in Technical Advice Note (TAN) 1 ‘Joint Housing Land Availability Studies’ (June 2006). In relation to situations where supply is below 5 years it states:  
  
*“Where the current study shows a land supply below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications, provided that the development would otherwise comply with national planning policies. In addition, local planning authorities must take steps to increase the supply of housing land....” (paragraph 5.1 TAN 1 (2006))*
5. To ensure that the revised national affordable housing planning policies introduced in 2006 were implemented all Local Authorities in Wales were required by WAG to produce an Affordable Housing Delivery Statements (AHDS). In the final guidance produced by WAG it was stated:  
  
*“AHDSs are an interim single purpose measure until authorities have adopted Local Development Plans (LDPs) in place. The Assembly Government regards the AHDSs as an essential transitional link between the current development plans and housing strategies and future LDPs.... ....[the AHDS] will be a material consideration that should be afforded significant weight when determining planning applications for housing and in dealing with such proposals at appeal.” (paragraph 1.11 Affordable Housing Delivery Statement Final Guidance, Feb 2009 (WAG))*
6. Policy A7 in the adopted Gwynedd Replacement Structure Plan (1993) states that a 5-year supply of land available for housing will be maintained.

7. The latest published Land Availability Study for Ynys Môn is the April 2009 report. In this study the land supply stood at 5.13 years supply. Due to the fact that the development plans for Ynys Môn were adopted in the mid 1990's the past building rate, last 5 years, is the methodology used to calculate the 5-year land supply for the Island.
8. A review of housing sites allocated in the Local Plan and the stopped UDP revealed that the majority of sites have been developed with only 20% of the current land bank consisting of allocated sites and only 230 units remaining on allocated sites without the benefit of planning permission. Within this figure of 230 units are 98 units on the Local Plan sites which have been available since 1996 but still not developed. This means that the majority of new housing sites approved until the adoption of the LDP will be on windfall sites.
9. Due to tight development boundaries, lack of large scale brownfield opportunities, and limited amount of potential from a review of units outside the current 5-year supply; the Local Planning Authority are of the opinion that insufficient sites will come forward to maintain a sufficient supply until the LDP is adopted. In addition should significant employment opportunities become available prior to adoption of the LDP there needs to be a strategy in place to provide sufficient housing units to facilitate such developments.
10. National Guidance as highlighted above states the importance of maintaining a 5-year land supply, it also advocates the use of interim policies to facilitate affordable housing provision. In light of this guidance the LPA have prepared this interim housing policy for strategic sites that seeks to maintain a 5-year land supply on the Island whilst increasing the threshold figures for affordable housing on such sites.
11. Currently the Authority are reviewing the Ynys Môn AHDS (Sept 2009) and if it is felt there is a need to produce an amended version this policy may well be incorporated within the Statement.
12. The policy **will be applied** to sites immediately adjacent to the existing development boundaries of Holyhead, Llangefni and Amlwch. These three settlements were identified as Main Centres in the UDP and Growth Centres in the 2008 pre-deposit **Anglesey** LDP. Their importance is also recognised in the Wales Spatial Plan (WSP). Llangefni is identified as a Primary Key Settlement in the Menai Principal Hub, Holyhead is also a Primary Key Settlement in the Holyhead Secondary Hub whilst Amlwch is a Key Settlement in the North of the Island. Therefore, it is envisaged that these centres will play a key role within **the Joint Anglesey and Gwynedd** LDP preferred strategy and can be supported for the provision of strategic housing sites.
13. A Soundness Review and Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) on the need for an interim policy and the options for delivering this need was carried out by Enfusion. It concluded that the preferred policy option (this policy) appears based on the evidence available to conform to the issues and requirements set out in the Planning Inspectorate's tests of soundness.

## Interim Housing Policy – Large Sites

14. The following is the proposed interim housing policy which will be used, in conjunction with relevant policies in the development plan and the stopped UDP, to deal with major housing applications of 50 or more units **or a site area of 1.5 hectare or more** within or adjoining Holyhead, Llangefni or Amlwch.

### IHP1 – Large Sites

In the settlements of Holyhead, Llangefni and Amlwch housing development of 50 or more units **or a site area of 1.5 hectare or more** on sites within or immediately adjacent to the development boundary, will be permitted provided that all the following criteria are complied with:

- i) For sites outside the development boundary clear evidence can be provided to show that a sequential test has been applied and that its application clearly demonstrates that there are no suitable, feasible or viable alternative sites currently available within the settlement;
- ii) An affordable housing provision of **up to 50%** is provided unless it can be proven to the satisfaction of the LPA, having considered all the relevant factors, that it would be inappropriate to do so;
- iii) The proposal is phased in line with employment opportunities in the area;
- iv) That suitable infrastructure is in place, or appropriate arrangements are made to ensure adequate provision in a timely manner;
- v) Proposals can be shown to positively contribute to the Council's five year supply of housing land based on the annualised Joint Housing Land Availability Reports, and be deliverable by providing details of the site's availability, suitability and achievability;
- vi) That the site is considered suitable as an extension to the settlement **and would not have an unacceptable impact on biodiversity interests and linkages, landscape and environment** impact;
- vii) **Having regard to the viability of the scheme and practical implications of doing so**, the proposed housing **should seek to** achieves the highest possible Code for Sustainable Homes level;
- viii) **That evidence is provided to demonstrate how the site addresses the implications of climate change, thus ensuring that the long term sustainability of the development has been taken into account;**
- viii) The development will not cause significant harm to the social, linguistic or cultural cohesion of the local community;
- ix) That the mix and type of housing proposed reflects the needs of the community.

### Reasoned Justification

15. The policy is introduced to ensure that the Council maintains a 5-year land supply and sets out the preferred option for managing housing land supply on large sites (i.e. for 50 units or more) until such a time that the Local Development Plan is adopted.
16. For the most part the development boundary for the three settlements is exactly the same in the Local Plan (1996) as that in the stopped UDP (2005). However, there are certain parts where there is significant change between the two plans. In relation to this particular policy, since the UDP boundary was subject to consideration at the inquiry into the plan in 2003, the UDP boundary will be used to determine whether a site is immediately adjacent to the development boundary.

17. Since the majority of opportunities afforded under this policy will be on Greenfield sites there will be a requirement to justify the proposed site in light of potential brownfield or obsolete employment allocations **or sites** in the relevant settlement. Should there be alternative site(s) within the boundary then the Council will require justification over the proposed site outside the development boundary in lieu of alternative site(s) within the boundary. **In line with Planning Policy Wales preference will be given towards previously developed land when considering the sequential test.**
18. In line with the Affordable Housing Delivery Statement (AHDS) (Sept 2009) the Council will seek to obtain **up to 50%** affordable housing provision on such sites. To enable the involvement of Housing Associations the Council would expect the housing to be built to comply with WAG's prevailing Development Quality Requirements (DQR). Should the applicant question the viability of providing 50% affordable provision then the council will require developers to provide specific details illustrating the viability of the proposed development and will be required to pay for the Council to approach an independent specialist to evaluate the viability information. Where proposals are not considered to be viable permission may be refused. Subject to justification through a viability study, the Council will consider entering a legal agreement regarding phasing the affordable housing provision in line with the current market conditions.
19. If the LPA can be satisfied that on-site provision is not possible then consideration will be given towards negotiating a commuted sum. The Council is in the process of preparing an 'Empty Homes Strategy' for the Island and part of any commuted sum could support the re-use of existing empty properties on the Island.
20. Detail should be submitted in support of such applications outlining the intended phasing of the proposal and showing how this is interlinked to the development of employment opportunities in the settlement.
21. The onus will be on the developer to show that the relevant infrastructure provision to serve the development is in place, or that agreement is in place to secure the necessary infrastructure **e.g. water supply, foul and surface water drainage facilities etc.**
22. Regard will be given to the latest position in relation to the 5 year land supply at the time of a specific application and whether further land is still required to maintain the supply up to the adoption of the LDP. **Since the 5 year supply is based upon past building rates it is not possible to provide a definitive figure over future requirements up to adoption of the LDP. However, based on the past 10 year trend approximately a 1,000 additional units are required by 2016 to maintain a 5 year supply. Of course not all of these units will be delivered under the interim policy since the existing policy framework supports windfall development on suitable sites or existing buildings in the existing settlement hierarchy. The annual Land Availability Study will allow the Council to monitor the latest position in relation to future needs.**
23. As with current exception sites there is a need to ensure that the proposed site is suitable in terms of visual, **biodiversity and environmental** impact and whether it would be considered as a suitable extension to the settlement or as an intrusion into the open countryside. **Regard will be given to the existing policy framework that seeks to protect the Ynys Mon AONB and landscapes of historic interest.**

24. Due to the scale of the sites considered under this policy a Welsh Language Impact Assessment will be required. This is in line with the Council's Supplementary Planning Guidance on 'Planning and the Welsh Language' (2007) and will enable the Council to consider any social, linguistic or cultural impact upon the local community of any proposed scheme.
25. In June 2010 TAN 22 'Planning for Sustainable Buildings was published. Section 7.2 refers to Strategic Sites in the LDP and that consideration should be given towards local requirements for sustainable building standards that could be higher than the current requirements in PPW (2010). In light of this the Council will seek to negotiate the highest possible Code for Sustainable Homes level.
- 25a The need to tackle the causes and consequences climate change is reflected in national planning policy and guidance as well as national strategies. Proposals considered under this policy are required to demonstrate what site specific opportunities are provided by the site to allow the development to limit greenhouse gas emissions and adjust to changes in the climate. The matters that should be taken into consideration include:**
- **Vulnerability to the effects of climate change including issues of flooding and drainage;**
  - **Capability of incorporating renewable energy sources/ technologies (e.g. orientation, wind speed);**
  - **Possibility of capitalizing on the use of existing community infrastructure;**
  - **Promotion of sustainable transport choices;**
  - **Capability of incorporating on site waste recycling facilities and/ or capitalization of existing services/ facilities;**
  - **Any further relevant factors supported by National Policy (for example TAN 22 specifically lists 'Factors in assessing the potential for sustainable building standards on strategic sites').**
26. It is important that communities are provided with a proper range and mix of dwellings to meet the varying requirements and needs of local communities. A key role in achieving this is to ensure development proposals are justified in terms of evidence that the homes to be built reflect local requirements.
27. A sustainability report will be required to satisfy the LPA that the development of the proposed site will not have an adverse harm on the environment or a specific designation. **In sensitive locations there may be a requirement to undertake screening for a Habitat Regulations Assessment and/or an ecological report on protected species [possibly inclusion of reference to Environmental Impact Assessment requirements and confirmation over this approach for HRA - awaiting Enfusion feedback].**
28. Such proposals will have to satisfy the other policies contained within the development plan and the stopped UDP (2005), and normal development control requirements e.g. Design & Access Statements, **Open space requirements as specified in TAN16, on or off site flood risk** etc.
29. Compliance with this policy does not prevent the Council from seeking planning gain in accordance with its SPG on Planning Obligations and national planning policy.
30. The introduction of this interim policy does not prevent the consideration of other sites that are in line with current policies within the Local Plan and the stopped UDP. END.

**Addendum to Item .....**  
**Interim Housing Policy – Large Site**

Following discussions with Enfusion, the company appointed to undertake Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) work on the Interim Policy, the following additional amendments are recommended to the policy:

1] Agreed with Countryside Council for Wales (CCW) that a strategic level screen would be appropriate for this level of interim policy (to fulfil Habitat Regulations (2010) (HRA) requirements).

Role of the HRA at this level is to identify the likely significant effects that will need to be considered by lower level assessments and to recommend policy text (both for the main policy and the reasoned justification) to ensure that the policy in implementation is HRA compliant.

Anticipated that this screening work can be completed by the end of November, 2010.

2] Following the HRA work highlighted above there may be minor word changes suggested, specifically to criteria (vi) and paragraph 27, to ensure wording is sufficiently robust to cover the HRA requirement.

3] For specific comments on the SA/SEA (objections 66 to 74), Enfusion state there is nothing that requires specific recommendations for policy amendments. There is a need to record our responses to the comments in a table and provide these as an addendum to the SA/SEA report alongside the policy.

**Recommendation: That the approach advocated by Enfusion, highlighted above, is supported by the Executive and undertaken prior to the adoption of the policy.**