

AGENDA ITEM NO.

ISLE OF ANGLESEY COUNTY COUNCIL	
Report to	Full Council
Date	8th December 2011
Subject	Interim Planning Policy – Housing in Rural Clusters
Portfolio Holder(s)	Commissioner Alex Aldridge
Lead Officer(s)	Nia Haf Davies, Manager, Joint Planning Policy Unit
Contact Officer	Bob Thomas, Team Leader, Joint Planning Policy Unit
Nature and reason for reporting	
To adopt an Interim Planning Policy – Housing in Rural Clusters as an interim policy until the Joint Local Development Plan is adopted in 2016.	

A – Introduction / Background / Issues
<p>A.1 A report justifying the need for an Interim Planning Policy for Housing in Rural Clusters was submitted at the Environment and Technical Services Scrutiny meeting of the 10th May 2011.</p> <p>A.2 These are the key points emerging from the national planning policy framework that must be addressed when drawing up policies and assessing relevant planning applications -</p> <ul style="list-style-type: none">• Earmarking clusters and smaller villages• Approval for groups of housing• Not creating elongated developments, merging villages or fragmented development patterns• Infilling within groups of houses and some sensitive extensions to them may be acceptable• Development control in the countryside must continue• Accessibility to main towns and villages with public transport is important• The need to reduce car journeys and promote alternative modes of transport• Avoiding excessive new housing developments in rural villages

A.3 An extended eight week consultation period (including with local members) was allowed between the 14th July and 8th September, 2011. In total 28 organisations / individuals responded making 74 separate representations.

A.4 Appendix (i) to this report provides in a table format a detailed summary of all the representations made on the Interim Policy.

A.5 The Environment and Technical Services Scrutiny Committee considered the results of the public consultation at its meeting on 24.10.11.

B - Considerations

B.1 Representations made and officers recommendations on the Draft Policy were considered by the Scrutiny Committee on 24.10.11 and appropriate changes have been made to the Policy.

Additional Matters Raised in Scrutiny Committee (24-10-11)

B.2 Inclusion of Glyn Garth within the policy – Concern has been expressed over the inclusion of this cluster since plots in this locality are too expensive.

The Officers are of the opinion that since the policy only supports the provision of affordable housing for local need such schemes will simply not come forward if the plot price is too expensive. This area is currently open countryside in the Local Plan and stopped UDP therefore the current value of plots should reflect this fact. Including this cluster within the policy would potentially support up to 2 separate affordable houses in the locality thereby assisting towards creating a more balanced community. Not including the cluster within the policy would remove the opportunity for such provision being provided in the area.

B.3 Revisit paragraph 6.3 before the LDP is finalised (limiting development to Affordable Housing provision) – Current National Policy and guidance provides support over prioritising affordable housing for local needs in rural locations.

Part of the Joint Local Development Plan (JLDP) process will be to evaluate the whole settlement hierarchy and the type of development deemed acceptable within such settlements. This process will be informed by stakeholders, which include

Members, and will involve public consultation at key stages in preparing the JLDP.

It is the Officers opinion that in light of current National Policy the interim policy should be limited to affordable housing provision to meet local needs. The process of preparing the JLDP involves reviewing the evidence base and supplementing where necessary. This work will involve examining the basis for local need market housing. This position will be reviewed as the JLDP is prepared.

B.4 Mortgage and 'local person' condition - Whether mortgage lenders would be willing to provide a mortgage for such properties.

Discussions with the Housing Service have taken place in relation to obtaining a mortgage for any dwellings coming forward under this policy. Appendix (ii) explains that the proposed Section 106 Agreement would be the same as that used for affordable provision on allocated sites and other sites within development boundaries.

It is Officers opinion that the proposed Section 106 would allow dwellings to be provided and that additional mechanisms from the Council i.e. bridging loans, may well in the future provide an additional method for delivering such proposals.

Further Work following Scrutiny Committee

B.5 Since the Scrutiny Report we have received comments from Enfusion our Sustainability Appraisal (SA) /Strategic Environmental Assessment (SEA) consultants. In relation to comments on the SA/SEA/HRA (Habitats Regulation Assessment) document their response is that no further work is required in relation to the matters raised, and these have been incorporated within the table in Appendix (i). Consideration has also been given towards the revised Interim Policy and Enfusion have confirmed that this would not impact upon the findings of the SA/SEA/HRA document.

Board of Commissioners

B.6 At their meeting on the 28 November the Board of Commissioners supported the Interim Policy and recommended that it be taken to the Full Council on the 8 December to be adopted as an interim policy by the Council.

B.7 Appendix (iii) to this report contains a copy of the revised policy and Appendix

(iv) the revised SA/SEA/HRA Report, which reflects suggested changes that the Officers recommend and responds positively to the comments received by stakeholders and the Scrutiny Committee.

B.8 It is felt that the revised version of the Policy is more robust following the consultation exercise.

C – Implications and Impacts		
1	Finance / Section 151	N/A
2	Legal / Monitoring Officer	N/A
3	Human Resources	N/A
4	Property Services (see notes – separate document)	N/A
5	Information and Communications Technology (ICT)	N/A
6	Equality (see notes – separate document)	EIA undertaken (copy attached to Board of Commissioners Report 28-11-11)
7	Anti-poverty and Social (see notes – separate document)	N/A
8	Communication (see notes – separate document)	N/A
9	Consultation (see notes – separate document)	No statutory period for Interim Policies however 8 week public consultation period undertaken.
10	Economic	N/A
11	Environmental	The impact on statutory designations will

C – Implications and Impacts		
	(see notes – separate document)	be taken into account in the planning application process
12	Crime and Disorder (see notes – separate document)	N/A
13	Outcome Agreements	N/A

CH - Summary
<p>Following the public consultation exercise and consideration by the Scrutiny Committee on two occasions, the Interim Planning policy – Rural Clusters is now ready for adoption in order for it to be used as a material consideration in dealing with planning applications.</p>

D - Recommendation
<p>That the Council adopt the Housing in Rural Clusters as an Interim Policy until the Joint Local Development Plan is adopted in 2016.</p>

Name of author of report: Bob Thomas on behalf of Head of Planning and Public Protection
Job Title: Team Leader (Housing & Communities) Joint Planning Policy Unit
Date: 29-11-11

Appendices:
<p>Appendix (i) - Summary Table of the comments received and Officers Recommendations.</p> <p>Appendix (ii) – Clarification over Section 106 Agreement on Dwellings in Rural Clusters</p> <p>Appendix (iii) – Copy of Final Interim Planning Policy – Housing in Rural Clusters</p> <p>Appendix (iv) – Copy of Final SA/SEA/HRA Screening</p>

Background papers

Board of Commissioners (28-11-11) Interim Planning Policy – Housing in Rural Clusters

Environment and Technical Services Scrutiny Committee (24-10-11) Interim Planning Policy – Housing in Rural Clusters (Feedback on Public Consultation)

Environment and Technical Services Scrutiny Committee (10-5-11) Interim Planning Policy – Housing in Rural Clusters (Justification over the Policy namely paragraphs 4.6.4, 4.6.8, 9.2.22, 9.3.1 and 9.3.2 of Planning Policy Wales (2011) and paragraph 4.1.2 of TAN 6 Planning for Sustainable Rural Communities)

Appendix (i)

Table of Comments Received on the Draft Interim Planning Policy – Rural Clusters

Appendix 1 – Comments on Draft Interim Housing Policy – Rural Clusters

Part A – Comments on the Draft Policy

A1) Do you consider that the content and purpose of the draft interim planning policy is clear and understandable?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/05	Too many acronyms used within the report.		Recommendation: Agree to include a glossary of terms / acronyms within final policy.
PT2/07	Para 10 – refers to interim policy large sites. Also confusion over whether the previous Ynys Môn LDP is given any weight in dealing with current applications.		Paragraph 10 from the previous Interim policy large sites was included in error within the consultation document. No weight is attached to the withdrawn Ynys Môn LDP (Nov 2008). Recommendation: Include correct paragraph within final policy.
PT2/08	It is confusing and appears a bit vague.	None suggested.	This is noted. Recommendation: No change to the policy.
PT2/09	Para 10 – refers to interim policy large sites. Needs to be made clear how the JLDP will be prepared from the numerous policy documents currently available.	None suggested.	Paragraph 10 from the previous Interim policy large sites was included in error within the consultation document. The JLDP process does not simply roll forward previous policies and proposals. Recommendation: Include correct paragraph within final policy.

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/10	It is not a clear document and paragraph 10 refers to major housing applications.		Paragraph 10 from the previous Interim policy large sites was included in error within the consultation document. Recommendation: Include correct paragraph within final policy.
PT2/11	Does take 3 hrs to read and understand the whole concept.	None suggested	This is noted. Recommendation: No change to the policy.
PT2/15	Acronyms could be used with a page giving details of all used for reference purposes.		Recommendation: Agree to include a glossary of terms / acronyms within final policy.
PT2/22	Support the purpose and principle of the policy in that it supports those areas that require help to sustain their communities. However wonder why certain areas that comply with the policy have not been included.		Comments made in relation to question A3 below highlight other areas to be considered for inclusion within the policy. Recommendation: Detailed comments below address this matter.

A2) Have the correct criteria, as highlighted in paragraph 11, been used to identify the clusters?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/02	Existing criteria support inclusion of Rhostrehwfa.	Include Rhostrehwfa in the list of clusters.	This matter is dealt with in detail in the response to question 3 below.
PT2/03	Existing criteria support inclusion of	Include Rhostrehwfa in the list	

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	Rhostrehwfa.	of clusters.	
PT2/04	Existing criteria support inclusion of Rhostrehwfa.	Include Rhostrehwfa in the list of clusters.	
PT2/07	It should be paragraph 11 not 12 as on the comments form.		The paragraph numbers did change within the policy and unfortunately this was not corrected on the comment form. However felt the question on the form enabled people to confirm which paragraph was being referred to.
PT2/09	It should be paragraph 11 not 12 as on the comments form.		
PT2/10	It should be paragraph 11 not 12 as on the comments form.		
PT2/11	Concern that there is no maximum in total. This needs to be clarified.		The policy clearly states that the level of development will be limited to two dwellings per cluster for the first five years. Recommendation: No change to the policy.
PT2/15	Question whether any development in Glyn Garth or Druid Road Menai Bridge could be considered as affordable. Also need to consider the fact that Glyn Garth is in the AONB and therefore would question how the clusters were identified.		The clusters were identified through the criteria within the policy. Should applications not comply with the affordable element of the policy then they would not be supported. All applications must comply with other policies in the Local Plan and stopped UDP one of which deals with the AONB. Recommendation: No change to the policy.
PT2/16	A balanced judgement should be taken on each group based on	Give positive weighting or scoring where there is more	In evaluating the overall settlement hierarchy within an emerging

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	weighting or scoring of criteria as opposed to a simple yes or no.	than 5 houses, there is an existence of a rural school and/or local post office, where more than 1 transport mode exists and if it is on a strategic bus route.	development plan a weighting or scoring of criteria would be undertaken. This would assist in defining the role of different settlements and thereby their classification within the hierarchy, which in turn generally determines how much growth the settlement should potentially absorb. In this instance it is recommended that an additional category of settlement should be added to the existing hierarchy of settlements and that specific criteria is used to identify suitable Rural Clusters. It is the Officers' opinion that affording different weight to individual criteria would not add value to the selection process. Recommendation: No change to the policy.
PT2/21	Consideration should be given to rural areas more than 800m from a train or bus stop, since those in rural areas would be willing to travel greater distances.		The distances used are from the 'Guidelines for providing journeys on foot' and greater distances raise questions over the sustainability of the location. Recommendation: That the acceptable distance from public transport and community facilities is not extended.

A3) Do you agree that the right clusters have been identified?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/01	<ul style="list-style-type: none"> • No problem envisaged regarding water supply to these clusters. • 7 Clusters identified as being outside public main sewer facility. • No sewerage problems envisaged for areas served by public sewerage system. 	<ul style="list-style-type: none"> • Need to ensure development in areas not served by public sewers comply with circular 10/99. 	<p>Note content of response. Recommendation: No change to the policy.</p>
PT2/02	<p>Rhostrehwfa should be included because:</p> <ul style="list-style-type: none"> • There are more than 5 dwellings in the area; • On a bus route; • Within walking distance to a public house and a shop; • A development pattern similar to a square or a circle; • Not isolated and does not form ribbon development; • Recent application refused for local family seeking taking over the family farm; • Recent development in the cluster of houses. 	<ul style="list-style-type: none"> • Include Rhostrehwfa within the policy. 	<p>It is accepted that the area suggested is within the acceptable distance for public transport (a bus stop in this case) and within 1km to community facilities.</p> <p>In the initial assessment housing around the village of Rhostrehwfa was not identified due to the fact that it was felt it did not comply with the definition of a cohesive cluster within the policy.</p> <p>A review of the area suggested for inclusion by 5 objectors was undertaken. In light of this review it is accepted that part of the area requested does form a cohesive cluster.</p>
PT2/03	Rhostrehwfa should be included	<ul style="list-style-type: none"> • Include Rhostrehwfa within 	

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	because it satisfies the criteria: <ul style="list-style-type: none"> • Local families wish to return to live in the area; • A bus stop is located in the area; • There are 2 Chapels, Public house and a shop within half a mile; • 7 dwellings on one side of the road and 6 on the other. 	the policy.	Since the adjoining village of Rhostrehwfa is named as a settlement in the Local Plan and the stopped UDP it is suggested that the rural cluster that would be the subject of this Interim Policy be referred to as cluster East of Rhostrehwfa to avoid confusion.
PT2/04	Rhostrehwfa should be included because it satisfies the criteria through: <ul style="list-style-type: none"> • More than 5 houses in the locality; • Shop, public house and Chapel in the locality; • Within 800m to a bus stop. 	<ul style="list-style-type: none"> • Include Rhostrehwfa within the policy. 	Recommendation: Amend the policy through the inclusion of part of area requested as cluster East of Rhostrehwfa.
PT2/24	Feel an additional cluster at Rhostrehwfa should be identified since: <ul style="list-style-type: none"> • Has at least 5 dwellings forming a cohesive group; • Has community facilities such as a Church, public house and children's play area; • Has good public transport links; • The form of the cluster is that of a circle or a square and does not like some of the other proposed 	Include Rhostrehwfa within the policy.	

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	clusters form a ribboned or sporadic development.		
PT2/25	<p>Feel an additional cluster at Rhostrehwfa should be identified since:</p> <ul style="list-style-type: none"> • Has at least 5 dwellings forming a cohesive group; • Has community facilities such as a Church, public house and children's play area; • Has good public transport links; <p>The form of the cluster is that of a circle or a square and does not like some of the other proposed clusters form a ribboned or sporadic development.</p>	Include Rhostrehwfa within the policy.	
PT2/11	<p>Additional cluster between Four Mile Bridge and Valley not needed in Valley because:</p> <ul style="list-style-type: none"> • There is adequate housing provision in Valley; • Transport issues meet the criteria but will have a big impact on the road to and through the village; • Ongoing problems with sewerage; • Not within easy walking distance to services. 	<ul style="list-style-type: none"> • Remove cluster between Four Mile Bridge and Valley from the policy. 	<p>Since the policy is for affordable housing provision any application will have to prove the need for the dwelling and this justification would have to show why alternative sites in the vicinity are not appropriate. The proposed scale of development, up to a maximum of 2 units, means a possible minor increase in transport and sewerage requirements.</p> <p>Recommendation: No change to the policy.</p>

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/13	Not happy with the list of clusters and question how they were identified.	None specified.	The clusters were identified in line with the criteria as explained in the section 'Identification of the Clusters' within the draft policy. No specific additional clusters were put forward by this objector. Recommendation: No change to the policy.
PT2/14	There are many more groups on Anglesey which meet paragraph 12 criteria. 'Moranedd' (otherwise known as Shepherds Hill) should be included since it complies with the criteria in the policy in that: <ul style="list-style-type: none"> • There are 11 dwellings in a cohesive group; • Is within 300m to a bus stopping point; • Within 1km to a Public house and a community hall 	Inclusion of Moranedd (otherwise known as Shepherds Hill) within the policy.	It is accepted that part of the area suggested for inclusion forms a cohesive cluster and is within 1km to a community facility. At present it does not lie within 800m to a bus stop. However, supporting evidence has been provided indicating that it is approximately 300m from a bus stopping point. In addition there is a signed commitment from a bus company that, based on probable compliance with relevant guidance, it would be willing to pick up people from this point.
PT2/28	Feels that 'Shepherds Hill' should be included as a cluster on the grounds of: <ul style="list-style-type: none"> • In 2006 on a previous application in the cluster Planning Officers state that Shepherds Hill was a cluster; 	Include Shepherds Hill within the policy.	The Officers opinion is that a formal bus stop needs to be established at this point to comply with the requirements of

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	<ul style="list-style-type: none"> • Shepherds Hill was recommended for inclusion in the UDP as a proposed modification; • There are 27 dwellings in the locality forming a cohesive cluster; • There is a bus route within 500m, as well as a chapel, community centre and a public house all within 1km. 		<p>being within 800m to a bus stop.</p> <p>However, it was confirmed with the Council's Highway Service that this bus route (number 51) does not allow accessibility to a main employment centre by 9am. This is also a requirement within the policy. In light of this the proposed cluster does not comply with the criteria within the policy.</p> <p>Recommendation: No change to the policy.</p>
PT2/15	Cannot really agree since plots in Glyn Garth could be too expensive.	None specified.	See response to PT2/15 above
PT2/16	<p>Additional cluster to the North of Llanddaniel should be identified since:</p> <ul style="list-style-type: none"> • Consists of 10 dwellings with 2 dwellings on the opposite side of the public highway; • Highway has been widened at this location and within 30mph; • Within walking distance to local school and post office; • Within 300m to a bus stop; • Located on strategic bus route and sustrans national route 8. 	Add in additional cluster to the North of Llanddaniel.	<p>It is accepted that the area suggested for inclusion is within 800m to a bus stop and is within 1km to a community facility.</p> <p>The linear form of the group of dwellings at this location however does not satisfy the cohesive cluster requirement of the policy.</p> <p>Recommendation: No change to the policy.</p>

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/17	Support given over the inclusion of the cluster West of Llynfaes since there is a clear cluster at this location.	None.	No objection received over the inclusion of this cluster. Recommendation: No change to the policy.
PT2/18	There are numerous other clusters elsewhere on the Island that are far more suited to development. There should be a definitive description (such as Denbighshire UDP) and then every cluster on the island can be considered. Felt that the cluster at Bryngollen Llannerch-y-medd is wholly inappropriate.	Include a criteria based policy rather than a specific list of clusters.	Without prejudice guidance was sought from the Welsh Government (WAG at the time) in relation to this interim policy. It was stated that producing guidance on the basis of 'un-named' or unidentified clusters seems to undermine the value of the policy and still left matters open to interpretation. In light of this it is not felt appropriate to simply have a criteria based interim policy. This approach is considered to be consistent with advice given in para 4.1.2 of TAN 6: "In rural areas, especially where there are environmental constraints or social or cultural considerations, planning authorities may wish to give priority to affordable housing to meet local needs, by identifying those smaller villages and clusters where future housing development will be limited to this category." Recommendation: No change to the policy.

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/19	Gives detailed guidance in relation to 11 of the proposed clusters in relation to sewered areas and the need to investigate any potential flood risk. All sites should also have due regard to surface water attenuation through the use of Sustainable drainage systems and no development within 4m of a watercourse.		Note the content of the response especially in relation to individual clusters and these matters will be given due regard with any applications that may come forward under the policy. Recommendation: No change to the policy.
PT2/20	Rather than using existing properties to identify the limited development opportunities it would therefore be better to identify specific boundaries for development in each cluster.		The size of these clusters together with the anticipated scale of development, of up to 2 dwellings, mean that highlighting suitable properties is the preferred method of identification. Areas identified under policy 50 of the Local Plan and policy HP5 of the stopped UDP, do not contain development boundaries and these are larger clusters. Previous attempts by the Local Authority to introduce loose development boundaries that incorporated 'white land' have been rejected. Recommendation: No change to the policy.
PT2/21	Aberffraw Community Council feel that Dothan, Ty Croes and Soar should be included due to:	Include Dothan, Ty Croes and Soar within the policy.	Dothan – Two parts of Dothan were suggested for inclusion being Dothan cross-roads and a grouping around

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	<ul style="list-style-type: none"> • There are chapels in the two areas; • There is a close natural community in the areas; • There is a lack of opportunities for local families to establish homes in their communities; • A recent housing needs assessment of Aberffraw area revealed the need for affordable housing in the locality. 		<p>Capel Dothan.</p> <p>In both cases whilst they are within 1km to a community facility they are more than 800m from a bus stop. Also in both cases they do not satisfy the requirement of a cohesive cluster. Recommendation: No change to the policy.</p> <p>Ty Croes – It is within 1km to a community facility and 800m to a bus stop and a train stop. A group of dwellings adjoining the formers Queen’s Head is considered to form a cohesive cluster. Recommendation: Amend the policy through the inclusion of area requested as cluster Ty Croes.</p> <p>Soar – It is accepted that it forms a cohesive cluster, is within 1km to a community facility, and is within 800m to a sustrans route. Recommendation: Amend the policy through the inclusion of area requested as cluster Soar.</p>

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/22	<p>Feel that Trefdraeth should be included due to:</p> <ul style="list-style-type: none"> • It is in line with the policies criteria; • Consists of 8 dwellings; • Within walking distance to Bethel which has a shop and public transport provision; • The local primary school is also close. <p>There is a need to support local families to strengthen the Welsh language within the community.</p>	<p>Include Trefdraeth within the policy.</p>	<p>It is accepted that the area suggested lies within 1km to community facilities. and is within 800m to sustrans route. However, in the Officers opinion it does not form a cohesive cluster as defined in the policy. Recommendation: No change to the policy.</p>
PT2/23	<p>Another cluster on the edge of Brynsiencyn around the properties of Pengroes, Whitehall and Llys Llewelyn should be included since this area meets with the criteria recommended.</p>	<p>Include additional cluster to the East of Brynsiencyn within the policy.</p>	<p>The 5 dwellings proposed as this group are sporadic in nature and does not in the officers opinion form a cohesive cluster. Recommendation: No change to the policy.</p>
PT2/26	<p>Llaneilian area should include Cae Ficer Estate since it fully conforms to the proposed criteria.</p>	<p>Include additional cluster around Cae Ficer estate within the policy.</p>	<p>It is accepted that the area suggested for inclusion is within 800m to a bus stop and is within 1km to a community facility. However, it was confirmed with the Council's Highway Service that this bus route (number 31) does not allow accessibility to a main employment centre by 9am. Also in Officers opinion it does not form a cohesive cluster as</p>

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			defined in the policy. Recommendation: No change to the policy.
PT2/27	Feel that Llechcynfarwydd should be included within the policy since there are 5 dwellings in the locality. Also land owner intends to provide a plot for grandson to develop his landscape garden business.	Include Llechcynfarwydd within the policy.	The dwellings proposed as this group are sporadic in nature and does not in the officers opinion have sufficient number of units in the central cross roads to form a cohesive cluster. Recommendation: No change to the policy.

A4) Do you agree with the definition of a cohesive group as explained in paragraph 12?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/02	Felt that Rhostrehwfa satisfies this definition.		See comment in relation to Rhostrehwfa cluster in question 3 above.
PT2/04	Felt that Rhostrehwfa satisfies this definition.		
PT2/07	It should read paragraph 12 not 13 on the comments form		The paragraph numbers did change within the policy and unfortunately this was not corrected on the comment form. However felt the question on the form enabled people to confirm which paragraph was being referred to.
PT2/08	It is clear but not in paragraph 13.		
PT2/09	It is clear but paragraph number is 12 not 13.		
PT2/10	It is clear but paragraph number is 12		

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	not 13.		
PT2/16	Existing settlement hierarchy in the existing development plan identify settlements in linear form in fact the proposed cluster between Valley and Four Mile Bridge is one such cluster. PPW supports infill plots within such groups of houses and this is likely to have lesser impact on the amenities of an area. Consideration over the impact of development should be properly left for assessment as part of the development control process.		The proposed cluster between Four Mile Bridge and Valley does consist of 2 areas bisected by roadways along which additional properties have been constructed. This is different from proposed clusters in linear form that only consist of a single line of dwellings alongside one side of the road, which are deemed to be ribbon development. Recommendation: No change to the policy.

A5) Are there any other matters you wish to raise in relation to the draft interim policy?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/02	Rhostrehwfa is identified in Policy 50 of the Local Plan which allowed exceptional one off developments outside official development boundaries.		Local Plan policy 50 allowed for single dwelling applications provided that the proposed site was within or formed a reasonable minor extension to the existing developed part of the settlement. Settlements under this policy did not have a development boundary identified.

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			Recommendation: No change to the policy.
PT2/05	The Community Council (Pentraeth) will not make comments since the time permitted is too short.		This is noted. Recommendation: No change to the policy.
PT2/07	Concern regarding the weight given towards the previous Ynys Môn LDP especially the Candidate Sites put forward in Newborough. Numerous issues of concern in relation to the Newborough candidate sites are raised.		There seems to be some confusion over this policy and Candidate sites submitted in Newborough as part of the Ynys Môn LDP (Nov 2008). The JPPU will write to these individuals explaining the position in relation to the Interim policy, the JLDP and the changes in the Candidate Site Register for the emerging plan. Recommendation: No change to the policy.
PT2/08	In relation to candidate sites in Newborough raises issues against their development.		
PT2/09	In relation to candidate sites in Newborough raises issues against their development.		
PT2/10	In relation to candidate sites in Newborough raises issues against their development.		
PT2/14	Paragraph 14 – does not take into account a returning person who has lived in an area until they departed for work.		The existing wording in paragraph 14 states that only one of the two qualifying criteria needs to be satisfied. The second refers to somebody who has spent 5 continuous years or more at some time in the past. This satisfies the

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			issue being raised here. Recommendation: No change to the policy.
PT2/14	Paragraph 17 – The provision of such housing [affordable] in the countryside on the basis of (perhaps) a low income and perhaps specific medical needs would seem to be inappropriate.		The existing settlement hierarchy as identified in the stopped UDP provides opportunities for open market housing in 95 separate settlements on the Island. In addition to this there is a permissive policy for the conversion of suitable outbuildings throughout the county into residential use.
PT2/14	This draft policy seems to be highly discriminatory, being heavily weighed against members of the general public, giving favour and rights to a specific group.		Paragraph 9.2.22 of Planning Policy Wales edition 4 Feb 2011 in reference to isolated groups of dwellings in the countryside states that "...sensitive filling in of small gaps, or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable...".
PT2/18	It should not be limited to only affordable housing. The cost of purchase and building will make it unaffordable and means that only where plots are donated to a family member do they become affordable. Limiting the policy in this way makes it totally ineffective and robs those who are not in affordable need to buy a plot and build in their community.		Due to the scale and location of the clusters identified under this policy it is felt that only affordable housing to meet the needs of the local community are appropriate. The level of development
PT2/24	Agree that the policy should facilitate new dwellings to meet housing needs for local people but do not believe that		

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	restrictions of affordable housing should be put upon these developments.		anticipated under the policy also means that limiting it to affordable housing will ensure a more balanced community.
PT2/25	Agree that the policy should facilitate new dwellings to meet housing needs for local people but do not believe that restrictions of affordable housing should be put upon these developments.		This approach is consistent with national planning policy and guidance, e.g. paragraph 4.1.2 of TAN 6 Recommendation: No change to the policy.
PT2/28	Whilst supporting the provision of affordable housing feel that this policy should also allow other applicants to be able to gain planning permission in these clusters.		
PT2/15	Important that guidelines are adhered to if and when applications are received.		This is noted. Recommendation: No change to the policy.
PT2/17	Support over the policy in that it will help to sustain vibrant and sustainable communities through allowing local families to stay in their local community.		This is noted. Recommendation: No change to the policy.
PT2/20	Suggests minor changes to the wording within parts of the document for clarity purposes. Some additional wording suggested to ensure that the policy conforms with the Council's		Agreed in principle but need to liaise with housing service over precise alternative wording to the policy, which would ensure conformity with the council's Housing Strategy. Confirm that

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	Housing Strategy		<p>the suggested amendments do not alter the thrust/ meaning of the Interim Policy.</p> <p>Recommendation: That the JPPU discuss detailed changes with the Housing Service to ensure conformity with the Housing Strategy.</p>

Part B – Comments on the SA/SEA/HRA Screening Document

B1) Do you agree with the key findings of the SA/SEA?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	The assessment has identified the particular sensitivity of much of Anglesey in relation to landscape.	Feel there is justification to further strengthen bullet point 5 of the policy to include incorporating the existing vernacular design where possible.	Detailed design policies of the Local plan and stopped UDP refer to this matter. For the purpose of clarity agree to amend the policy in line with this suggestion. Recommendation: Amend bullet point 5 of the policy through reference to existing vernacular design.
PT2/22	Agree with the 5 key findings		This is noted. Recommendation: No change to the policy.

B2) Do you agree with the HRA Screening Summary?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	Para 5.7 – would expect a short summary explaining why sites have been ‘screened out’ of the assessment at this stage.		In accordance with current practice, the HRA focus is on screening in those European sites where there is the potential for a likely significant effect. All other European sites are effectively

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			'screened-out' of the process, but it is not necessary nor practicable to explain why sites were excluded. Recommendation: No change to the policy or HRA report.
PT2/06	Para 5.14 & 5.15 – The 'in combination' effects of this policy with other plans and projects needs to be closely monitored and the policy kept under review.	Any HRA required from the large sites interim policy or other significant developments should also fully consider the implications of development from this rural clusters policy.	All housing approvals are monitored by the JPPU. Will ensure that it is possible to track development approved under this policy. Recommendation: Establishment of specific monitoring system for these clusters.
PT2/11	Too complicated to comment upon.	Needs to be simplified.	This is noted. Recommendation: No change to the policy.

B3) Are there any other matters you wish to raise in relation to the SA/SEA/HRA Screening Document?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	Paragraph 2.5 & 2.6 – as there appears to be only one 'reasonable alternative' in this case they would expect an assessment of the 'do nothing' approach to be undertaken.	Due to the scale of the proposals envisaged under this policy this should not be seen as significantly undermining the assessment.	To 'not prepare an interim policy' is not considered a feasible alternative as it would not enable the facilitation of affordable housing to meet local needs, and would therefore be counter to national policy.

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			Recommendation: Noted, however appraisal not required in line with comment above.
PT2/06	Note that there is no monitoring element and that this will be covered by future SA/SEA work on the JLDP.	Feel that some sort of record is kept of the number of permissions granted in rural settlements to better inform future baseline assessment.	All housing approvals are monitored by the JPPU. Will ensure that it is possible to track development approved under this policy. Recommendation: Establishment of specific monitoring system for these clusters.
PT2/07	Highlights potential impact issues should candidate sites put forward for Newborough be implemented.	None specified.	There seems to be some confusion over this policy and Candidate sites submitted in Newborough as part of the Ynys Môn LDP (Nov 2008). The JPPU will write to these individuals explaining the position in relation to the Interim policy and the changes in the Candidate Site Register for the emerging plan. Recommendation: No change to the plan.
PT2/09	Comments made about impact of development of certain proposed candidate sites in Newborough.		
PT2/10	Comments made about impact of development of certain proposed candidate sites in Newborough.		
PT2/11	Too complicated	Simplified summary version would be more useful.	This is noted. Recommendation: No change to the policy.
PT2/19	Highlight key National and Regional policies and strategies that should be had regard to in relation to water and flood risk.	These should be incorporated within the Sustainability Appraisal document.	Relevant policies and strategies for all environmental topics are considered in the SA scoping report for the overarching LDP that has informed the

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
			SA Interim Framework. Notwithstanding there are references to relevant policy in the appraisal tables in the appendix. Recommendation: No change to the policy or SA document.

PT2/12 – simply completed relevant tick boxes without including any commentary.

Reference Number	Comments By		Reference Number	Comments By
PT2/01	Dwr Cymru / Welsh Water		PT2/15	Cwm Cadnant Community Council
PT2/02	A Gwynedd resident		PT2/16	An Ynys Môn resident
PT2/03	An Ynys Môn resident		PT2/17	An Ynys Môn resident
PT2/04	An Ynys Môn resident		PT2/18	Owen Devenport Ltd.
PT2/05	Pentraeth Community Council		PT2/19	Environment Agency Wales
PT2/06	Countryside Council for Wales		PT2/20	Ynys Môn Housing Service
PT2/07	An Ynys Môn resident		PT2/21	Aberffraw Community Council
PT2/08	An Ynys Môn resident		PT2/22	An Ynys Môn resident
PT2/09	An Ynys Môn resident		PT2/23	Williams & Goodwin
PT2/10	An Ynys Môn resident		PT2/24	An Ynys Môn resident
PT2/11	Valley Community Council		PT2/25	An Ynys Môn resident
PT2/12	Llanfaethlu Community Council		PT2/26	An Ynys Môn resident
PT2/13	Rhosyr Community Council		PT2/27	Ieuan Wyn Jones AC
PT2/14	An Ynys Môn resident.		PT2/28	An Ynys Môn resident

APPENDIX (ii)

Clarification over Section 106 Agreement on Dwellings in Rural Clusters

The proposed Section 106 Agreement on dwellings approved under the Interim Planning Policy Rural Clusters will be the same as that used for affordable units on allocated or windfall sites within development boundaries.

For any future resale of such an unit there will be a target that the dwelling is marketed at 30% below the open market value for private developer schemes or 20% for self build plots.

Should a satisfactory marketing period and campaign indicate there is no demand for an affordable dwelling in this cluster in the future then the property can be sold on the open market. In such cases the variation in value between the affordable value and the open market value (i.e. 20%) would be paid to the Council into an affordable housing fund that can in turn be used to provide additional affordable housing in areas of need.

The Council, jointly with Cyngor Gwynedd, are in the process of establishing a 'Tai Teg' register and web-site of people in affordable need. This should ensure that there is a list of people satisfying the Council requirements over being in affordable need and thereby being eligible to occupy any affordable housing becoming available in the locality.

There has been a general withdrawal by mortgage providers from schemes with Section 106 Agreements, however, the Council's revised Section 106 Agreement is acceptable by some mortgage providers. However for self build plots, in most cases, the mortgage is only available when the development has reached roof height.

The Council are in the process of piloting a bridging loan project whereby the Council would provide a loan until applicants were able to secure a mortgage. The scheme is being piloted on the Council's own plots for sale initiative with the intention of extending it to other self builders when it has been successfully established. This could be one avenue of assisting people to implement any approvals given under the Rural Clusters policy.

Cyngor Sir Ynys Môn • The Isle of Anglesey County Council

Ynys Môn

Anglesey

Draft Interim Planning Policy:

Housing in Rural Clusters

Adopted by
Isle of Anglesey County Council
December 2011



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Interim Planning Policy – New Dwellings in Rural Clusters

Background

1. The aim of the Interim Planning Policy, when adopted, will be to promote new housing developments on appropriate sites in recognised groups that will contribute to supporting and maintaining vibrant and sustainable communities.
2. In accordance with requirements of Planning Policy Wales and Technical Advice Note 6, the policy promotes new housing that will contribute to meeting recognised local need for affordable housing. This will assist in addressing the imbalance in the local housing market. The policy does not promote open market housing.
3. The historical pattern of development on the Island has created towns and villages of various sizes together with many groupings of houses and individual houses scattered across the length and breadth of the area. Over the years, the Council has been anxious to ensure that new developments contribute to supporting and maintaining vibrant and sustainable communities and meeting the need for new housing.
4. The Anglesey Local Plan (1996) and the Unitary Development Plan (stopped) (2005) promote new housing in a number of settlements identified in the settlement hierarchy of both plans. Politicians and residents wish to see an alternative policy as they do not believe that the policies in these plans adequately address the needs of the more rural communities on the Island.
5. Guidance in Planning Policy Wales (PPW) (2011) clearly states the need to maintain a 5-year supply of land for housing. The Council is working with Gwynedd Council to draw up a Joint Local Development Plan that will entail reviewing housing policies and designating more land for housing to boost the supply of land for housing in the short, medium and long term. However, it is not anticipated that there will be an adequate supply of land for housing from now up until the time that the Joint Local Development Plan is adopted. The Council has already adopted an Interim Planning Policy for the construction of open market housing, with an element of affordable housing, on large sites within or adjacent to Amlwch, Holyhead and Llangefni in order to boost the supply of land available for housing.
6. A consultant was commissioned to investigate how policies in the proposed Joint Local Development Plan could facilitate new housing in rural areas, and to provide guidance on the need for interim planning policies until such time as the Joint LDP is sufficiently advanced or has been adopted. The Consultant concluded that there is a basis for drawing up an interim planning policy in Anglesey because:
 - The Joint LDP will not be adopted until 2016;
 - The Welsh Government is still expecting Local Planning Authorities to facilitate more affordable housing to meet local need;

- The Welsh Government considers that groups of houses in the countryside has a role in terms of meeting the need for affordable dwellings and thereby supporting and maintaining sustainable communities;
 - The policies in the Local Plan and the Unitary Development Plan will not, in isolation, adequately meet the need for Affordable Housing in the area.
7. This additional planning policy can supplement, in a small way, the current planning policy framework that would enable the Council to meet the statutory requirements to provide a continuous five year supply of land for new housing. It is important that developments happen in a cohesive fashion and are not left to individual decisions. A failure to do so could lead to a sporadic and inconsistent strategy that would undermine the current development framework. Unless the Council takes proactive action to draw up an interim planning policy for the location of new developments in rural areas in the period up to the adoption of the joint LDP is adopted, pressure for developments would continue on an ad-hoc basis on sites that may be unsuitable.
8. Although the Interim Planning Policy, when adopted formally, will not form part of the statutory 'development plan', it will be a material planning consideration when considering relevant planning applications. Planning Policy Wales (Volume 4 February 2011) states that full account must be taken of national planning policy in forming policy (paragraph 1.1.4).
9. These are the key points emerging from the national planning policy framework that must be addressed when drawing up policies and assessing relevant planning applications -
- Earmarking clusters and smaller villages.
 - Approval for groups of housing.
 - Not creating ribbon developments, merging villages or fragmented development patterns.
 - Infilling within groups of houses and some sensitive extensions to them may be acceptable.
 - Development control in the countryside must continue.
 - Accessibility to main towns and villages with public transport is important.
 - The need to reduce car journeys and promote alternative modes of transport.
 - Avoiding excessive new housing developments in rural villages.

Draft Interim Planning Policy – New Dwellings in Rural Clusters

10. 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 local community need affordable housing applications for single dwellings in identified Rural Clusters.

PT2: New Housing in Rural Clusters

Within the identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.

- Local community need for an affordable dwelling has been proven.
- The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Interim Policy document.
- The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides.
- The size of the property is appropriate to the affordable housing needs of the applicant.
- The impact on the landscape is minimised by utilizing and retaining natural features and any other boundary features present on the application site.

The number of dwellings granted within the first five years of operating the policy will be restricted to two dwellings per cluster in order to minimise the impact on the very smallest groups and to prevent the possibility of coalescence with nearby clusters or settlements.

A Section 106 legal agreement will be attached to any dwelling granted planning permission restricting occupancy to those people who qualify as being local and are in need of affordable housing. There will also be a condition attached to any permission to manage residential permitted development rights to prevent the construction of an extension that would impact detrimentally on the future occupancy of the property by people who qualify as being local and in need of affordable housing. Modest extensions to the property will be supported.

The following clusters have been identified as those which satisfy the criteria within the Interim Planning Policy:

1. Bodorgan
2. Bro Iarddur, Trearddur
3. Bryngollen, Llannerch-y-medd
4. Cae Garw
5. City Dulas
6. De / South Bodffordd
7. De / South Cemaes
8. Dwyrain / East Amlwch
9. Engedi

10. Ffordd Pen y Clip / Druid Road
11. Glyn Garth
12. Gogledd ./ North Porth Llechog / Bull Bay
13. Gorllewin / West Cemaes
14. Gorllewin / West Dwyran
15. Gorllewin / West Llynfaes
16. Kensington Close, Amlwch
17. Llanallgo
18. Llaneilian
19. Rhwng Pont Rhyd y Bont a'r Fali / Between Four Mile Bridge and Valley
20. Dwyrain / East Rhostrehwfa
21. Ty Croes
22. Soar

Further information on the practical implementation of the policy will be provided in an accompanying Supplementary Planning Guidance on Rural Housing Clusters.

Explanation of Policy

Identification of the Clusters

11. The work of identifying the housing clusters has been undertaken by planning officers and a set of criteria have been agreed to assist with the identifying process. The clusters identified in the Policy meet the following criteria:-
 - At least five dwellings or more forming a cohesive group with one or more community facilities present, or if not, within 1km¹ walking or biking distance to a settlement which has at least one available community facility, and,
 - Within 800² metres of a bus or train stop, or on a Sustrans cycle route which would allow accessibility by employees to one of the main employment centres of Amlwch, Bangor, Holyhead and Llangefni by 9a.m. or within a 1km walking distance to one of these employment centres.

12. A “cohesive” group of dwellings has been defined as:
 - Forming a settlement pattern which is similar in form to a circle or square with at least one dwelling on the opposite side of a cluster bisected by a public highway.
 - Forming a close relationship with each other in terms of disposition and separation distances.

¹ 1 km is considered to be generally the maximum distance that individuals are willing to walk ('Guidelines for providing journeys on foot' by The Institute of Highways & Transportation)

² 800 m is considered to be preferred maximum walking distance to facilities (including bus stops) 'Guidelines for providing journeys on foot' by The Institute of Highways & Transportation'

- Not dispersed or forming ribbon or sporadic development.
13. It was considered important, given the national and local emphasis on promoting/ facilitating sustainable development, to ensure new development in the clusters would be as sustainable as possible and therefore accessibility to major employment centres by the start of the working day by different modes of transport was incorporated as a criterion. Likewise groups which are obviously examples of ribbon or sporadic development have been discounted. Any buildings which have been sub-divided into flats, apartments or holiday units have been counted as one existing dwelling in a group. A community facility is classified as any building or land which is being used for communal purposes.

Qualifying Local Person

14. As the policy is intended to facilitate new dwellings to meet a more localised housing need in areas where open market dwellings would not normally be allowed, the people who qualify as being local must fit into one of the following categories:-

- Lived in the Community Council area of the application site or an adjoining Community Council area for a continuous period of five years or more immediately before submitting the application/occupying the property in question.
- Lived or worked within the Community Council area of the application site or an adjoining Community Council area for a continuous period of five years or more at some time in the past.

(A map showing Community Council areas can be found in Appendix 2)

15. These are likely to be people who will wish to remain in their communities for social, cultural or linguistic reasons but cannot do so at the present time because of the limited affordable housing opportunities available.

Qualifying Need

16. A suitably qualifying local person, who intends to occupy the dwelling, must be in need of an affordable dwelling and is unable to obtain an existing dwelling within 1km of their preferred location on the open market because there are no affordable properties available within that radius. Applicants will need to prove that they have justifiable reasons why their current accommodation does not meet their needs. Further information, including financial and medical details will be required to support and substantiate evidence of need. For the purposes of the policy need is defined as people in one or more of the following categories:

- Currently homeless or on a housing waiting list
Establishing a new household for the first time
- Have been living in rented accommodation for at least three years

- The current dwelling is no longer suitable for family needs and cannot be upgraded or extended on the existing site to meet the changed need.
- Having an essential need to live close to another person who has a minimum of 10 years permanent and continuous residence in the immediate Community Council area, the essential need arising from proven age or medical reasons.
- Having special needs relating to the elderly or disabled.
- Leaving tied housing on retirement or on termination of employment.
- Having need to remain within the existing community for cultural or social reasons

Affordability

17. It is likely that most of the dwellings proposed under this policy will be single detached properties described as the 'intermediate' type of affordable housing category included in TAN 2 Planning and Affordable Housing (2006). The type, size and design of the house will affect its "affordability" for the first inhabitant and subsequent occupiers. It will therefore be important to ensure that the dwelling is commensurate with affordable housing need and is not too large or over elaborate in its design. Affordability will be ensured through setting a formula for the house price based on average wages in the area and a comparison with existing house prices. Further information on affordability levels and house size restrictions will be provided in the Interim Supplementary Planning Policy Guidance for Rural Housing Clusters.
18. An affordability assessment will be undertaken by the Council's Housing Department to determine whether applicants can afford to occupy an existing home, or have the ability to build a new home in their area of choice. The assessment is based on the applicant's financial position, i.e. income and savings, to determine mortgage entitlement in comparison to the current sales prices and market values of existing homes. Where no suitable alternative accommodation is available and where new build is the preferred option the costs of purchasing the plot will be included in the affordability calculation.

Plot Value

19. Where applicants have identified a suitable plot, in accordance with the Policy purpose and affordability assessment, a copy of the purchase price agreement, (e.g. a Purchase Option Agreement or Conditional Sale Contract being subject to Planning Approval being granted), confirming the exact location and boundaries of the plot will be required. This should be drawn up by the Applicants and Land Owner's Solicitors to confirm that the Land Owner (the Vendor) will sell the plot to the Applicants (the Buyers).
20. It is anticipated that there will be occasions where the Land Owner is willing to provide the plot at either nil or low value, e.g. to family and friends, or is prepared to defer the plot value until the home, when completed, is ever sold. Any such value deferral provisions will need to

agreed separately between the Land Owner and the Buyers during the plot purchase negotiations and confirmed as above.

Design and Siting

21. The design of any new dwellings should be appropriate to the setting, be unobtrusive and take advantage of site contours and any natural landscaping. Siting will only be allowed immediately adjacent or between shaded properties indicated on the enclosed maps. It will not be acceptable to build on the opposite side of a classified road unless the site is next to a shaded property on the same road frontage. Any new property built under the policy will not be regarded as an additional “shaded” property so as to prevent any unwarranted ribbon or sporadic development. Only those sites therefore currently shaded on the maps will form part of the policy.

Planning Agreements

22. A legally binding section 106 Agreement will be used to ensure that the dwelling is occupied by local people currently in need and that priority will be given to future occupiers who meet the definition of ‘local’ and ‘need’. This agreement will also specify measures to control the future value of the property to ensure it remains affordable. Usually this will be achieved by deciding on a percentage discount from normal open market housing. The Section 106 Agreement is acceptable to most mortgage lenders, whilst ensuring that the policy continues to serve its intended purpose, i.e. to provide a continuous supply of affordable housing within a specific locality. The standard Section 106 Agreement will be appended to the Interim Supplementary Planning Policy Guidance. Potential applicants should satisfy themselves that they are prepared to enter into an agreement before submitting a planning application.

Extensions and Numbers

23. As stated in the policy it will be necessary to manage permitted development rights to ensure a dwelling is not extended unduly which in turn could push up the price possibly beyond a comparable affordable value. Any new extensions will therefore require planning permission and be appropriate in terms of design and scale. The reasons behind the need for enlargement should be justified as part of a planning application. If planning permission is granted, this could result in an amendment to an existing planning Section 106 Agreement on the property.
24. Due to the sensitive rural locations of many clusters, their small scale and the fact that the policy is intended as an interim approach pending the adoption of the Local Development Plan, a limit of two dwellings per cluster for the first five operational years of the policy will be applied. During this period, the policy will be monitored and reviewed for possible inclusion, in its present or amended form, in the Joint Local Development Plan. A quota of two dwellings and no more gives an equal opportunity for all clusters for limited affordable housing

development. No more than two dwellings per cluster will be permitted even if further local affordable need can be proven.

ENDS.

Appendix 1

Clusters Identified under the Interim Planning Policy – Housing in Rural Clusters

The following clusters have been identified as those which satisfy the criteria within the Draft Interim Planning Policy:

1. Bodorgan
2. Bro Iarddur, Trearddur
3. Bryngollen, Llannerch-y-medd
4. Cae Garw
5. City Dulas
6. De / South Bodffordd
7. De / South Cemaes
8. Dwyrain / East Amlwch
9. Engedi
10. Ffordd Pen y Clip / Druid Road
11. Glyn Garth
12. Gogledd ./ North Porth Llechog / Bull Bay
13. Gorllewin / West Cemaes
14. Gorllewin / West Dwyran
15. Gorllewin / West Llynfaes
16. Kensington Close, Amlwch
17. Llanallgo
18. Laneilian
19. Rhwng Pont Rhyd y Bont a'r Fali / Between Four Mile Bridge and Valley
20. Dwyrain / East Rhostrehwfa
21. Ty Croes
22. Soar

The following maps identify the location of these clusters with relevant buildings shaded on the map. It is possible to locate new houses by infilling between the buildings shaded or on a site immediately adjacent.

[For the purpose of this report plans of Rural Clusters 1 to 19, as listed above, are not included since these have not changed since the Public Consultation Document (these can be viewed on the Council's web-site at: Council & democracy / Consultation / Previous consultations). Enclosed are maps for the additional Clusters number 20 to 22 from the above list]

**Clystyrau Ychwanegol Argymhellir ei cynnwys /
Additional Clusters Recommended for inclusion**

**I'r Dwyrain o Rhostrehwfa / East of Rhostrehwfa
Ty Croes
Soar**

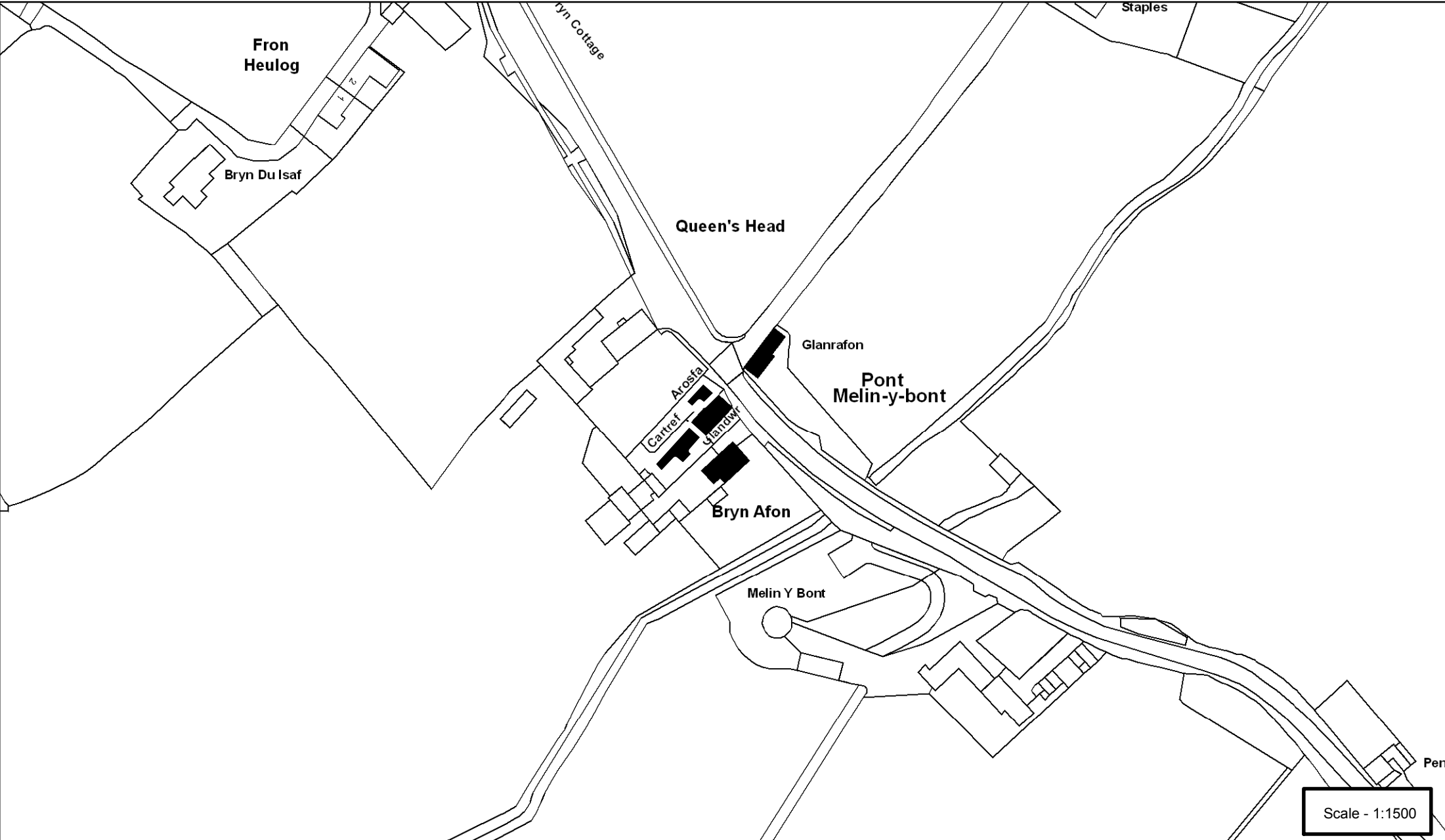


CLYSTYRAU WEDI EU CYNNIG / SUGGESTED CLUSTERS

I'r Dwyrain o Rhostrehwfa / East of Rhostrehwfa

POLISI CYNLLUNIO DROS DRO - MAPIAU

INTERIM PLANNING POLICY - MAPS



CLYSTYRAU WEDI EU CYNNIG / SUGGESTED CLUSTERS

Ty Croes

POLISI CYNLLUNIO DROS DRO - MAPIAU **INTERIM PLANNING POLICY - MAPS**



CLYSTYRAU WEDI EU CYNNIG / SUGGESTED CLUSTERS

Soar

POLISI CYNLLUNIO DROS DRO - MAPIAU

INTERIM PLANNING POLICY - MAPS

Cyngor Sir Ynys Môn • The Isle of Anglesey County Council

Ynys Môn

Anglesey

**Interim Planning Policy:
Housing in Rural Clusters**

**Sustainability Appraisal (SA)
incorporating Strategic
Environmental Assessment
(SEA)**

**Habitats Regulations
Assessment (HRA) Screening**

**Adopted
December 2011**



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

enfusion



Anglesey County Council: Interim Planning Policy – New Dwellings in Identified Rural Clusters

SA/SEA/HRA

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1.0 Introduction

- 1.1 In May 2011 Enfusion was commissioned to undertake Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment [SEA]) and Habitats Regulations Assessment (HRA) screening of Anglesey County Council's interim planning policy for housing in rural areas.
- 1.2 The SA/SEA appraisal and HRA assessment process are distinct, and their requirements arise from individual legislative processes¹. For the purposes of this interim planning policy, the SA/SEA and HRA findings are both summarised in this one report.
- 1.3 This report has been updated to take into account consultation responses received on the July 2011 SA/SEA and HRA report and to consider any significant changes to the interim planning document since this time.

2.0 Background

The Requirement for an Interim Planning Policy

- 2.1 In March 2011 Anglesey County Council and Gwynedd Council began working formally together to draw up a joint Local Development Plan (LDP). As part of this process the Councils will be reviewing housing policies and designating more land for housing to increase the supply of land for development across the plan area in the short, medium and long term.
- 2.2 However, the Joint LDP will not be adopted until 2016 and Anglesey Council has identified that the extant policies contained in the Anglesey Local Plan (1996) and the Unitary Development Plan [stopped] (2005) do not adequately address the needs of the rural communities on the Island for affordable housing.
- 2.3 In the period prior to the adoption of the Joint LDP, the Welsh Assembly Government (WG) is still expecting Local Planning Authorities (LPAs) to facilitate more affordable housing to meet local needs. It also considers that groups of houses in the countryside have a role in terms of meeting the need for affordable dwellings and thereby supporting and maintaining sustainable communities.
- 2.4 In this context, the Council has determined that it is appropriate to take a proactive approach and draw up an interim planning policy to facilitate the provision of new, affordable housing in rural areas to ensure that development is planned and consistent with the strategy set out in extant higher tier development plans and national planning policy and guidance.

¹ Sustainability Appraisal (SA) [incorporating Strategic Environmental Assessment (SEA) – The Environmental Assessment of Plans and Programmes Regulations, 2004] is required by the Planning and Compulsory Purchase Act, 2004. Habitats Regulations Assessment (HRA) is required by the Conservation of Habitats and Species Regulations, 2010.

- 2.5 In developing the policy the Council considered alternative approaches to meet the overarching aim of ensuring a supply of affordable housing in rural areas. This included a policy setting criteria for affordable housing, but not identifying or naming specific spatial clusters. The Council sought advice from the WG's Planning Division on this approach. The WG advised that such a policy based on 'un-named' or unidentified clusters could potentially undermine the delivery of the strategic policy intent. Accordingly, the Council did not develop this policy alternative further, and the preferred interim policy focuses on identified rural clusters.
- 2.6 For the purposes of SA/SEA the policy appraised is, therefore, the Council's preferred policy and is the only reasonable alternative taking into account a policy development process that has included the consideration of policy options.

Interim Planning Policy – New Dwellings in Identified Rural Clusters

- 2.7 The Council has set out the overarching aim of the Interim Planning Policy when adopted which will be, '... to promote new housing developments on appropriate sites in recognised groups that will contribute to supporting and maintaining vibrant and sustainable communities'². The policy will be in accordance with the requirements of Planning Policy Wales (4th Edition) and Technical Advice Notes (TAN)6.
- 2.8 The Interim Planning Policy on New Dwellings in Identified Rural Clusters is set out below. Additional text accompanying the policy provides explanations for the terms: qualifying local person; qualifying need; affordability; design and siting; planning agreements and extensions and numbers³.

PT2: New Housing in Rural Clusters

Within the identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.

- Local community need for an affordable dwelling has been proven.
- The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Interim Policy document.
- The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides.
- The size of the property is appropriate to the affordable housing needs of the applicant.

² Isle of Anglesey Council (July 2011) Interim Planning Policy – Housing in Rural Clusters, Environment and Technical Services Scrutiny Committee.

³ Ibid.

- The impact on the landscape is minimised by utilizing and retaining natural features and any other boundary features present on the application site.

The number of dwellings granted within the first five years of operating the policy will be restricted to two dwellings per cluster in order to minimise the impact on the very smallest groups and to prevent the possibility of coalescence with nearby clusters or settlements.

A Section 106 legal agreement will be attached to any dwelling granted planning permission restricting occupancy to those people who qualify as being local and are in need of affordable housing. There will also be a condition attached to any permission to manage residential permitted development rights to prevent the construction of an extension that would impact detrimentally on the future occupancy of the property by people who qualify as being local and in need of affordable housing. Modest extensions to the property will be supported.

The following clusters have been identified as those which satisfy the criteria within the Interim Planning Policy:

1. Bodorgan
2. Bro Iarddur, Trearddur
3. Bryngollen, Llannerch-y-medd
4. Cae Garw
5. City Dulas
6. De / South Bodffordd
7. De / South Cemaes
8. Dwyrain / East Amlwch
9. Engedi
10. Ffordd Pen y Clip / Druid Road
11. Glyn Garth
12. Gogledd / North Porth Llechog / Bull Bay
13. Gorllewin / West Cemaes
14. Gorllewin / West Dwyrain
15. Gorllewin / West Llynfaes
16. Kensington Close, Amlwch
17. Llanallgo
18. Llanellian
19. Rhwng Pont Rhyd y Bont a'r Fali / Between Four Mile Bridge and Valley
20. Dwyrain / East Rhostrehwfa
21. Ty Croes
22. Soar

Further information on the practical implementation of the policy will be provided in an accompanying Supplementary Planning Guidance on Rural Housing Clusters.

3.0 Sustainability Appraisal

- 3.1 In accordance with the requirements of Planning and Compulsory Purchase Act (2004) and the Strategic Environmental Assessment (SEA) Directive⁴; Sustainability Appraisal (SA) incorporating SEA was undertaken on the proposed interim policy. The SA/SEA used an

⁴ WAG (2006) Local Development Plan Manual.

interim SA Framework which is provided at Annex 1. The full appraisal is presented at Annex 2 and the key findings are summarised below.

Key Findings

- 3.2 The policy seeks to address a specific, identified need for improved accessibility to affordable housing in rural areas on the Isle of Anglesey.
- 3.3 The use of a criteria based approach requiring access to facilities and sustainable transport links, provides strong, positive, long term support for SA objectives seeking to improve community viability and cohesiveness. This approach is also particularly supportive of environmental SA objectives for climate change, as the promotion of development in locations where sustainable transport options are readily available, enables behavioural choices that will realise low carbon footprints (for both individuals and communities overall).
- 3.4 There is potential for even small scale (single) developments to have landscape impacts, and therefore the policy requirement to address potential effects through careful design provides appropriate mitigation for the appraisal to summarise that the overall effects of developments, both individually and cumulatively will be neutral in the medium and long term. The appraisal notes that historic landscape assets should also be considered in this context and recommends that any wording to protect landscape assets also encompasses the Island's extensive heritage and wider historic assets, many of which lie in the rural landscape adjacent to rural settlements.
- 3.5 Objectives for soil, water and air are positively progressed by the policy, and the appraisal notes that even small scale developments can make positive contributions at a local level through sustainable design and build techniques. This approach ensures that housing stock is economic to run and viable in the long term, reinforcing the wider SA objectives for community and economy.
- 3.6 Overall the draft interim planning policy on new dwellings in identified rural clusters effectively supports and progresses environmental, social and economic SA objectives, and no significant adverse effects are identified.

Changes to the Interim policy as a result of July 2011 consultation

- 3.7 In accordance with the requirements of SA/SEA, the changes made to the Interim Planning Policy as a result of the public consultation (July-September 2011) have been considered to determine if they would result in any changes to the SA/SEA and HRA of the policy. It was considered that the changes made to the policy were not significant; rather they were minor revisions or clarifications that would not materially alter the SA/SEA/HRA findings.

- 3.8 The addition of 3 rural clusters Dwyrain / East Rhostrehwfa, Ty Croes and Soar to the list of clusters in the Interim Policy is also a minor clarification, of which settlements satisfy the criteria. Additional housing at these sites at the scale envisaged would not have a significant effect on the SA/SEA or HRA findings.
- 3.9 Consideration has also been given to the comments received on the SA/SEA and HRA during this consultation. A copy of these comments and the SA/HRA response is included in Annex 3.

4.0 Appraisal Summary

- 4.1 The appraisal of the Interim Planning Policy on New Dwellings in Identified Rural Clusters was provided alongside the interim housing policy for consultation in July 2011. The appraisal has been updated to consider the final proposed version of the Interim Planning Policy; and no further amendments to the appraisal were considered necessary. Any future changes to the policy, including during the ongoing development of the LDP will, in accordance with good practice SA/SEA, be reviewed against the SA Framework to consider the potential effects of those changes. Future appraisals will be provided as an addendum to this report, or in the SA/SEA report accompanying the submission LDP.
- 4.2 At this stage of the LDP, SA/SEA process, specific monitoring proposals for the effects identified by the SA/SEA are not included in this report.
- 4.3 Monitoring is a central requirement of the new planning system and future SA/SEA work will seek to align and link targets and indicators with the Council's Annual Monitoring Report, as appropriate. Potential future SA/SEA indicators to monitor the progress of affordable housing provision may include:
- Number of affordable home completions (in specified period relevant to LDP development and review)

5.0 Habitats Regulations Assessment (HRA)

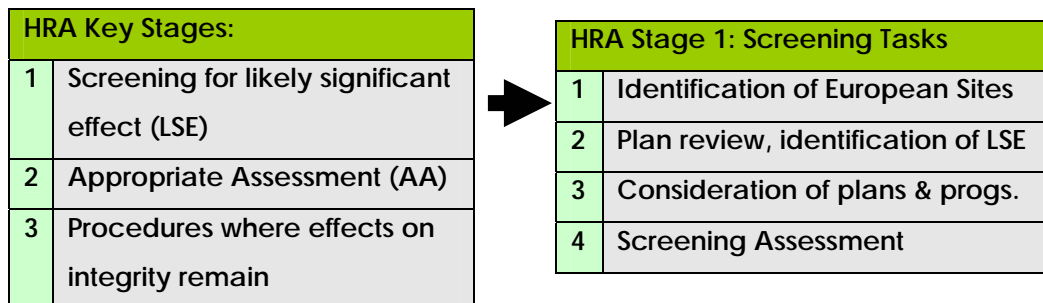
Requirement for HRA

- 5.1 Articles 6 (3) and 6 (4) of the Habitats Directive require ‘appropriate assessment’ (AA) to be undertaken on proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more European sites either individually, or in combination with other plans and projects. This requirement is set out in the Conservation of Habitats and Species Regulations 2010 (‘the Habitats Regulations’) which require the application of AA (or HRA as it is now more widely known) to all land use plans. Welsh Assembly Government (WAG) guidance also requires that Ramsar sites (which support internationally important wetland habitats) and are listed under the Convention on Wetlands of International Importance (Ramsar Convention 1971) are included within HRA/AA and that candidate SACs and proposed SPAs are treated as ‘designated’ sites in the context of HRA.

HRA Stages

- 5.2 HRA is undertaken in 3 main stages, with the screening stage comprising 4 key tasks.

Figure 1: HRA Key Stages – Stage 1: Screening Tasks



HRA Screening of the Interim Planning Policy

- 5.3 HRA is typically undertaken holistically for LDP policies, and each policy is assessed in the context of the overall plan, and in relation the other policies it contains. The focus of a plan level HRA is principally on the strategic policies which provide for specific types of development (e.g. employment, housing and infrastructure) as it is these activities that are most likely to generate impacts when implemented that are relevant to the condition status of European sites and wider biodiversity interests.
- 5.4 As detailed in section 2 of this report, this interim planning policy has been developed to address a specific requirement for affordable housing in rural areas in Anglesey and this approach will be considered as part of the process of preparing the joint LDP by Anglesey and Gwynedd Councils. Therefore, whilst this policy is being assessed

individually at this stage of the LDP process, it has also been considered in the light of ongoing work and future policy approaches. In particular, recent HRA screening findings for the Interim Housing Policy: Large Sites have informed the analysis⁵.

Task 1: Identification of European Sites

- 5.5 Anglesey supports an extensive range of biodiversity interests and the European sites that lie within the spatial scope of the interim planning policy are listed in Figure 2.

Figure 2 - European Sites: Initial Scoping
Special Areas of Conservation (SAC)
Y Twyni o Abermenai I Aberffraw/ Abermenai to Aberffraw Dunes SAC
Afon Gwyrfrai a Llyn Cwellyn SAC
Glannau Môn: Cors heli / Anglesey Coast: Saltmarsh SAC
Corsydd Môn/ Anglesey Fens SAC
Cemlyn Bay SAC
Glan-traeth SAC
Glannau Ynys Gybi/ Holy Island Coast SAC
Llyn Dinam SAC
Y Fenai a Bae Conwy/ Menai Strait and Conwy Bay SAC
Special Protection Areas (SPA)
Glannau Ynys Gybi / Holy Island SPA
Traeth Lafan/ Lavan Sands, Conway Bay SPA
Bae Lerpwl/ Liverpool Bay SPA
Ynys Feurig/ Cemlyn Bay and the Skerries SPA
Ramsar Sites
Corsydd Môn a Llŷn/ Anglesey and Llyn Fens Ramsar

- 5.6 Each of the European sites listed in **Figure 2** was reviewed using the information provided by CCW's Natura 2000 Management Plans, and the Joint Nature Conservation Committee (JNCC) listings. The sites were examined with particular reference to their: condition status; vulnerabilities (including existing pressures and trends) and the factors that are necessary to maintain site integrity.⁶
- 5.7 HRA guidance recommends that following an initial scoping of sites the assessment should seek to screen out European sites for which impacts are unlikely. The information on European sites was, therefore, considered in the context of possible impacts and effects arising from the interim policy (see **Figure 3**) using a 'source-pathway-receptor' model. The analysis indicated that seven European sites should be considered by the screening assessment:
- **Glannau Ynys Gybi SAC/SPA** - vulnerable to recreational pressures, air pollution and disturbance; situated to the north west of two

⁵ Habitats Regulations Assessment Screening Report. Ynys Môn/Isle of Anglesey County Council. Local Development Plan. Interim Housing Policy: Large Sites (December, 2010).

⁶ JNCC and CCW data sources – see references and bibliography.

identified clusters (Bro Iarddur, Trearddur (2), Rhwng Pont Rhyd Y Bont a'r Fali (19)⁷).

- **Y Fenai a Bae Conwy SAC** - vulnerable to commercial fishing effects, coastal developments, changes in water quality; situated south, southwest of three identified clusters; (Ffordd Pen y Clip/Druid Road, Menai Bridge (10), Glyn Garth (11), Gorllewin/West Dwyran (14)).
- **Corsydd Môn SAC/ Ramsar** - vulnerable to changes in water quality and recreation pressures; situated northwest of two identified clusters (De/South Bodfordd (6), Cae Garw (4)).
- **Afon Gwyrfaï a Llyn Cwellyn SAC** - situated outside the plan/policy area; hydrologically linked as a water source for settlements clusters (6, 4, near Llangefni) identified by the interim policy.
- **Glannau Môn: Cors heli SAC** - situated outside the plan/policy area; hydrologically linked as the downstream receiving environment for consented discharges from settlements clusters (6,4, near Llangefni) identified by the interim policy

Task 2: Policy Review and Identification of Likely Significant Effects

Policy Review

- 5.8 The policy makes provision for very small scale developments (a quota is set for a maximum of two dwellings within the first five years of the policy operating) at each of the nineteen identified clusters across the Island⁸. This indicates that an upper limit of approximately 38 individual dwellings will be permitted during this period.
- 5.9 The identified clusters are dispersed across the Island and their intrinsically rural nature combined with the scope of the policy means that any development will not extend the boundaries of the identified settlement clusters, or lead to coalescence with other settlements. Specifically, the policy requires that all complying developments occur within the footprint of existing developments (i.e. located between or adjacent to existing buildings coloured on the relevant inset maps included as an annex to the interim planning policy).
- 5.10 The policy includes requirements to minimise landscape impacts and retain natural features as part of any development process.

Identification of Likely Impacts

- 5.11 Housing and associated infrastructure developments have the potential to generate a number of impacts that may affect biodiversity interests. **Figure 3** summarises the generic effects and impact types.

Figure 3: Housing and Infrastructure Development: Summary of Effects on European Sites and Impact Types

⁷Reference number related to identified clusters – Consultation Draft, Interim Planning Policy Maps (Isle of Anglesey County Council, 2011).

⁸ Consultation Draft, Interim Planning Policy Maps (Isle of Anglesey County Council, 2011) provide details of proposed areas where development will be permitted.

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	<ul style="list-style-type: none"> ▪ Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) ▪ Introduction of invasive species (predation)
Disturbance	<ul style="list-style-type: none"> ▪ Increased recreational activity (population increase) ▪ Noise and light pollution (from development and increased traffic)
Changes to hydrological regime	<ul style="list-style-type: none"> ▪ Increased abstraction levels ▪ Increased hard standing non-permeable surfaces/ accelerated run-off ▪ Laying pipes/ cables (surface & ground) ▪ Topography alteration
Changes to water quality	<ul style="list-style-type: none"> ▪ Increase in run-off/ pollutants from non-permeable surfaces ▪ Increased air pollution (eutrophication) ▪ Increased volume of discharges (consented)
Changes in air quality	<ul style="list-style-type: none"> ▪ Increased traffic movements ▪ Increased emissions from buildings

5.12 The extent to which the effects identified in **Figure 3** are relevant to, and significant for the European sites identified in Task 1, depends on a range of factors including the specific sensitivities/ vulnerabilities of the designated species/ habitats and the opportunities for identified impacts to 'travel' or move to the sites concerned. Importantly for the HRA of this interim policy, the determination of significance also depends on the scale and intensity of the development proposed.

5.13 The policy review has indicated that development will primarily comprise individual dwellings at dispersed locations across the Island. This small scale development is likely to encompass elements of the key impacts noted in Figure 3. However, the developments will be at a site level and are unlikely to generate impacts that extend beyond the identified cluster boundaries. Therefore, any effects arising will be minor and in the context of the requirements set by the Habitats Regulations are not assessed as significant for biodiversity given the distance of the settlement clusters from individual European site and the designations' known sensitivities (Task 1).

Task3: Consideration of other plans, programmes and projects

5.14 The Habitats Regulations require that assessments consider the potential for LSE arising from the plan alone and in combination with other plans. The analysis at Task 2 has indicated that it is unlikely that the policy will have LSE on European sites alone. Given the scope of the Interim Planning Policy, cumulative interaction with other plans or projects (e.g. local transport plans and other infrastructure developments) leading to LSE for the European sites considered, is assessed as unlikely.

- 5.15 It should be noted that the HRA findings for the Interim Housing Policy: Large Sites (December, 2010) did identify the potential for LSE arising from new housing developments in the areas of Holyhead, Llangefni and Amlwch, where several of the identified clusters are also proposed. The HRA (Dec 2010) adopted a precautionary approach, in line with Countryside Council for Wales (CCW) advice, and recommended that environmental assessments and project level HRAs be a requirement for these large scale developments, where designated biodiversity interests may be affected. Therefore, any potential interactions between the Interim Policy for Large (strategic) sites and this Interim Policy for New Dwellings in Identified Rural Clusters should be a material consideration as the policy is implemented.

Task 4: Screening Summary

- 5.16 Implementation of this policy will not lead to direct impacts (e.g. habitat loss or fragmentation) for the European sites identified. Indirect effects from development, across the range of potential impacts identified in Figure 3 are not assessed as significant for the European sites considered, given the small scale and relatively contained nature of the developments that will occur as a result of this policy. It is assessed that the policy alone will not have LSE on the European sites scoped into the assessment.
- 5.17 In combination effects arising from interactions with other plans and projects are also assessed as unlikely. However, as a precautionary measure, it is recommended that proposed developments at identified clusters near the settlements of Holyhead, Llangefni and Amlwch, should also be considered in the light of any wider, strategic housing developments proposed, or under development at the time of application.

Consultation

- 5.18 The Habitats Regulations require the plan making/ competent authority to consult the appropriate nature conservation statutory body, CCW on the method and findings of the HRA screening. This screening opinion is provided to CCW for consultation and comments, and any advice and recommendations will be incorporated into the assessment as appropriate.
- 5.19 The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. The WG's guidance indicates that it is good practice to make information on HRA available to the public at each formal consultation stage. Therefore, in addition to the statutory consultation undertaken with CCW, this report will also be made available for wider circulation.

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ANNEX 1: SA INTERIM FRAMEWORK

From April 2011 Anglesey and Gwynedd Council will be working jointly on the LDP process, including the production of a joint SA/SEA of the plan. SA/SEA scoping is currently underway and the report, including the SA Framework is in draft prior to consultation. In line with work undertaken for Anglesey’s Interim Planning Policy: Housing – Strategic Sites; this SA/SEA process has employed an interim SA Framework.

The interim SA Framework conforms to the scoping work undertaken by Anglesey in 2006, and is additionally informed by the SA/SEA Framework for the Wales Spatial Plan to ensure that all the key issues relevant to sustainability in Anglesey are addressed by the appraisal. To support the appraisal, decision-aiding questions based on the SA Framework sub-objectives of the Wales Spatial Plan are included. The SA Objectives and decision-aiding questions presented in the interim SA Framework have informed and are compatible with the SA/SEA Scoping process currently underway for the joint Anglesey & Gwynedd LDP process.

Anglesey Interim SA Framework	Relevant Wales Spatial Plan SA/SEA Objectives	Decision Aiding Questions
1. Biodiversity <i>SEA Topic: Biodiversity Fauna and Flora</i>	Biodiversity and Geodiversity	
a) Minimise negative impacts on biodiversity in the wider countryside (outside designated sites), and enhance where possible.	Value, conserve and enhance biodiversity and geodiversity at all levels	Does the policy: <ul style="list-style-type: none"> • Protect the integrity and avoid the fragmentation of designated sites • Conserve, create an enhance appropriate wildlife habitats and wider biodiversity in urban and rural areas • Enable people to access and appreciate Anglesey’s natural heritage • Conserve and enhance marine habitats and the marine environment
b) Protect and enhance: designated sites (N2K, SSSIs) their biodiversity and protected species (island-wide).		
c) Protect and enhance areas where people can come into contact and appreciate wildlife and wild places.		
d) Safeguard and enhance biological connectivity.		
2. Soil/ Ground <i>SEA Topic: Soils</i>	Soil/ Biodiversity and Geodiversity	
a) Ensure mineral supplies are managed sustainably	Minimise contamination and safeguard soil quality and quantity	Does the policy? <ul style="list-style-type: none"> • Avoid and reduce soil contamination • Promote the regeneration of contaminated land and the use of previously developed
b) Manage waste sustainably and provide the necessary facilities to deal with waste, reducing the amount going to landfill by enabling recycling		

Anglesey Interim SA Framework	Relevant Wales Spatial Plan SA/SEA Objectives	Decision Aiding Questions
c) Protect and enhance regionally important geological sites (RIGS)		land <ul style="list-style-type: none"> • Protect and enhance soil quality • Minimise soil erosion • Conserve and enhance designated geological sites and wider geodiversity
d) Protect the best and most versatile land.		
3. Water <i>SEA Topic: Water</i>	Water and Flood Risk	
a) Lessen water pollution to help maintain water quality currently in place.	Minimise the adverse effects of land-use on inland and coastal water resource quantity, quality and reduce flood risk	Does the policy: <ul style="list-style-type: none"> • Ensure water quality of rivers, lakes, ground waters and coastal areas are improved • Minimise diffuse pollution for rural and urban areas • Protect and maintain water resources and encourage water efficiency • Minimise flood risk and ensure that new development does not increase flood risk
4. Air <i>SEA Topic: Air, Climatic Factors</i>	Air Quality	
a) Improve air quality by ensuring that air pollution and emissions continue to go down.	Maintain and improve air quality across Wales	Does the policy: <ul style="list-style-type: none"> • Improve air quality, e.g. through transport management and reduction of employment related emissions • Avoid siting new development in areas of poor air quality • Reduce the need to travel, e.g. through provision of appropriate public transport infrastructure
5. Climate Change <i>SEA Topic: Climatic Factors, Air</i> Dealing with and tackling the causes of climate change by:	Climatic Factors (including climate change mitigation and adaptation)	
a) Lowering energy consumption and facilitating/encouraging use of renewable energy (without adversely affecting the environment)	Reduce green house gas emissions in both existing and new development and ensure that adequate measures are in place to adapt to climate change	Does the policy: <ul style="list-style-type: none"> • Reduce the emission of greenhouse gases from buildings, transport and energy generation • Encourage new developments that are
b) Introducing mitigation and adaptation measures to lessen the impacts of climate change.		

Anglesey Interim SA Framework	Relevant Wales Spatial Plan SA/SEA Objectives	Decision Aiding Questions
c) Avoiding development in areas most at risk from the effects of Climate Change		<ul style="list-style-type: none"> energy efficient and climate change resilient Ensure adaptation planning that maximise the opportunities and minimises the costs of climate change
6. Landscape <i>SEA Topic: Landscape</i>	Landscape	
a) Protect and improve the quality of publicly accessible open space.	Value, conserve and enhance Wales' landscape	Does the policy: <ul style="list-style-type: none"> Protect and enhance Anglesey's special landscape qualities Minimise the loss of tranquillity and reduce light pollution Take sensitive locations into account when siting development & promote high quality design
b) Integrate new development with landscape and character of the island		
7. Health <i>SEA Topic: Human health</i>	Health and Well Being	
a) Protecting and enhancing human health	Promote and provide services to maintain healthy communities	Does the policy: <ul style="list-style-type: none"> Reduce inequality and help to provide access to all facilities and services Remove barriers and create opportunities for people to live healthier lifestyles e.g. encouraging walking and cycling
8. Community <i>SEA Topic: Population</i>	Social Fabric	
a) Ensure that urban and rural communities meet their differing needs.	Build vibrant, safe and cohesive communities	Does the policy: <ul style="list-style-type: none"> Promote community interaction Improve safety and security for people and property Ensure inclusion of all sections of the community, reduce social exclusion Meet the needs of an aging population
b) Preventing and reducing crime and the fear of crime by embracing crime prevention through effective design.		
c) Supporting strong, vibrant and inclusive communities.		
9. Cultural Heritage <i>SEA Topic: Cultural Heritage</i>	Cultural heritage	

Anglesey Interim SA Framework	Relevant Wales Spatial Plan SA/SEA Objectives	Decision Aiding Questions
a) Supporting fully bilingual communities in which the Welsh language, culture and heritage can flourish and prosper. b) Preserve historic buildings, archaeological sites and other culturally important features, such as SAMs, historical parks, gardens and landscapes.	Understand, value, protect, enhance and celebrate Wales' diversity, local distinctiveness and cultural and historic heritage	Does the policy: <ul style="list-style-type: none"> • Ensure that local historic and cultural assets and distinctiveness are protected from negative effects of development • Promote access to the historic environment for tourism and education • Protect and enhance opportunities for Welsh speaking communities
10. Material Assets <i>SEA Topic: Material Assets</i> Creating a prosperous future for Anglesey through sustainable economic regeneration	Material Assets (including energy, resource efficiency and waste)	
a) Encourage all development to be of high quality sustainable design. b) providing sustainable infrastructure, sustainable transport and communications. c) Promote effective use of existing infrastructure. d) Provide green-technology and related sustainable employment to suit local needs.	Make sustainable use of natural resources Build and maintain environmentally friendly, high quality services and infrastructure	Does the policy: <ul style="list-style-type: none"> • Promote high quality, sustainable design that recognises local distinctiveness and a sense of place in style, materials and scale • Improve the integration of different, more sustainable modes of transport • Provide good quality employment opportunities, including for environmental goods and services
	Economy	
e) Meet the housing and employment buildings requirements for the community f) enhancing leisure and community facilities on the island and protecting open space.	Encourage a vibrant and diversified economy	Does the policy: <ul style="list-style-type: none"> • Promote sustainable economic growth • Deliver affordable and high quality sustainable housing in rural and urban areas

ANNEX 2: SA/SEA of Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters

Note: The appraisal in Annex 2 was undertaken on the draft policy wording. As explained in Paragraph 3.7, the changes made to the policy since then are not considered significant; therefore the appraisal findings are unchanged.

SUSTAINABILITY APPRAISAL KEY	
++	Development actively encouraged as it would resolve an existing sustainability problem
+	No Sustainability constraints and development acceptable
0	Neutral
?	Unknown/uncertain effect
-	Potential sustainability issues; mitigation and /or negotiation possible
--	Problematical and improbable because of known sustainability issues ; mitigation or negotiation difficult and /or expensive
x	Absolute sustainability constraints to development

Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters. (full policy wording set out in Report, Section 2)					
4. Within identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.					
<ul style="list-style-type: none"> ■ Local community need for an affordable dwelling has been proven. ■ The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Draft Interim Policy document. ■ The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides. ■ The size of the property is commensurate with the identified affordable housing need and within the size limitations for such dwellings. ■ The dwelling seeks to minimise the impact on the landscape by utilizing and retaining natural features and any other boundary features present on the application site. 					
SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
1	<p>Biodiversity Value, conserve and enhance biodiversity and geodiversity at all levels</p>	<p>The policy focuses development within existing settlement clusters (either between or adjacent to existing buildings) in the context of identified settlement areas. The policy approach therefore supports the use of previously developed land and should avoid the loss of significant greenfield areas with biodiversity interests. The footprint of developments proposed through this interim policy will be minimal (1-2 dwellings per settlement) and overall impacts are appraised as neutral with development acceptable and free from sustainability constraints in the short, medium and long term. Existing Local Plan Policies 49/50 include criteria to ensure that nature conservation sites are protected.</p>	+	<p>Proposed clusters Glyn Garth & Fford Pen y Clip, lie adjacent o the Menai Strait & Conwy Bay SAC (Anglesey and Gwynedd SA Baseline Evidence, 2011)</p>	<p>All development should seek to conserve and enhance identified biodiversity assets, in particular where developments occur adjacent or proximal to national and international designated sites.</p> <p>[Site level Habitats Regulations Assessment are unlikely to be necessary for single/ small scale developments but where/if designated sites are directly adjacent a screening opinion</p>

Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters. (full policy wording set out in Report, Section 2)

4. Within identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.

- Local community need for an affordable dwelling has been proven.
- The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Draft Interim Policy document.
- The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides.
- The size of the property is commensurate with the identified affordable housing need and within the size limitations for such dwellings.
- The dwelling seeks to minimise the impact on the landscape by utilizing and retaining natural features and any other boundary features present on the application site.

SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
					should form part of any preliminary work]. ⁹ Measures should be proportionate, i.e. maintaining greenspace around dwellings, ensuring effective water/ sewerage management.
2	Soil, ground Minimise contamination and safeguard soil quality and quantity	By focusing development within existing settlement clusters the policy supports the SA objective to minimise impacts on the soil resource. The use of previously developed land may also support minor reclamation/ restoration of soil assets. Minor positive impacts in the medium to long term, are likely at a local level.		+	

⁹ Habitats Regulations Assessment (HRA) Screening of this policy is provided separately as an Annex to this SA/SEA Report.

Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters. (full policy wording set out in Report, Section 2)					
<p>4. Within identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.</p> <ul style="list-style-type: none"> ▪ Local community need for an affordable dwelling has been proven. ▪ The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Draft Interim Policy document. ▪ The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides. ▪ The size of the property is commensurate with the identified affordable housing need and within the size limitations for such dwellings. ▪ The dwelling seeks to minimise the impact on the landscape by utilizing and retaining natural features and any other boundary features present on the application site. 					
SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
3	Water Minimise the adverse effects of land-use on inland and coastal water resource quantity, quality and reduce flood risk	All new developments require water supply and treatment infrastructure commensurate with the scale of development. Existing policies specify the requirement for suitable sewerage services and infrastructure prior to development including small, local scale sites.	+	TAN22 Planning for Sustainable Buildings (WAG)	In the context of affordability aims, opportunities for sustainable design, including for e.g., rainwater harvesting and local scale sustainable drainage systems should be supported and encouraged.
4	Air Maintain and improve air quality across Anglesey	The policy requires any development to be well related to sustainable transport solutions (public transport, cycling). This approach reduces the likelihood on increased travel by private car and supports SA objectives to maintain and improve air quality on Anglesey. No sustainability constraints, and long term positive impacts through supporting and encouraging sustainable travel patterns.	+	Air quality is not a significant issue for Anglesey, with the exception of identified 'hot spots' related to road transport, which are subject to regular monitoring (Anglesey and Gwynedd SA Baseline, 2011).	Support for sustainable construction practices can assist in reducing carbon emissions from buildings over the lifetime of the construction.
5	Climate Change Reduce green	New developments increase levels of atmospheric pollution through build and use	++	TAN22 Planning for Sustainable Buildings (WAG)	

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SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
	house gas emissions in both existing and new development and ensure that adequate measures are in place to adapt to climate change	phases, however the volume of new development supported by this policy is minimal and the impacts are not appraised as significant. Additionally, all new developments have the potential to incorporate sustainable design measures to reduce emissions, and the focus of the policy on linking new dwellings to sustainable transport options provides strong support for this SA objective. Positive impacts for the medium and long term.			
6	Landscape Value, conserve and enhance Anglesey's landscape	The policy makes provision for a small number of dwellings at identified clusters, where all new developments will be required to blend with surrounding development and minimise impacts on landscape. The potential for adverse visual impacts is most likely where new developments fall within designated AONB (e.g. identified clusters on Holy Island, adjacent to the Menai Straits and on the North, East and		0	Almost the entire 201 km coastline of Ynys Mon is designated as an AONB. The island contains a great variety of fine coastal landscapes. New development needs to be sympathetic to the existing landscape. (Anglesey and
					Mitigation measures effectively set out in proposed interim policy.

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SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
		South West coastal areas of the Island. The policy provide appropriate protection for the unique landscape qualities of the Island and the scale of development proposed is appraised as neutral in the medium and long term.		Gwynedd SA Baseline, 2011).	
7	Health Promote and provide services to maintain healthy communities	The policy supports development within settlement boundaries where at least one or more community facilities are present (or within 1km walking/ cycling distance). This approach will assist in supporting the viability of existing services and facilities which provide the foundation of community health and wellbeing. The volume of new development will be small therefore positive effects are likely to be minimal and overall the policy is appraised as neutral against this objective in the long term.	0	Policy should promote opportunities for young people/ families to remain resident on the Island (Anglesey and Gwynedd SA Baseline, 2011).	
8	Community	The policy is focused on delivering affordable	++	There is a need to facilitate	

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SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
	Build vibrant, safe and cohesive communities	housing in the context of existing settlements with access to community facilities. This approach provides strong support for the SA community objective and it particularly tackles identified issues of out migration caused by limited availability of affordable housing. This policy approach is actively encourages as it tackles an identified sustainability issue and would provide positive outcomes for communities in the long term.			the development of affordable housing across the Island. (Anglesey and Gwynedd, SA Baseline, 2011).
9	Cultural Heritage Understand, value, protect, enhance and celebrate Anglesey's diversity, local distinctiveness and cultural and historic heritage	Anglesey has a significant number of cultural and heritage sites, located across the length and breadth of the island. Existing policy requires that all new developments take account of sites that are of historic or archaeological importance. This policy limits development within the boundaries of existing, identified settlement clusters and requires consideration of landscape and boundary		0	Opportunity to include wording to ensure that dwellings minimise impacts on the setting of historic and cultural assets alongside landscape features as currently specified.

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SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
		features of all new development. Significant impacts (positive or negative) are unlikely and overall the policy is appraised as neutral in the long term. Opportunity for additional policy safeguards to ensure all heritage interests addressed.			
10	<p>Material Assets</p> <p>Make sustainable use of natural resources</p> <p>Build and maintain environmentally friendly, high quality services and infrastructure</p> <p>Encourage a vibrant and diversified economy</p>	<p>The policy provides support for new developments to be undertaken using sustainable build techniques which has the potential to contribute to high quality housing and infrastructure in the long term. Minor positive effects are possible in the longer term.</p> <p>The policy focuses specifically on addressing identified affordable housing needs in named settlement areas. This approach seeks to ensure that people have access to both housing and employment opportunities and provides strong support for SA objectives to</p>	+	Affordable Housing Delivery Plan (Sept 2009)	

Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters. (full policy wording set out in Report, Section 2)

4. Within identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.

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SA Objective		Assessment of Effects		Evidence and Reference (where available)	Suggested Mitigation and Enhancement Measures
		Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
	by meeting housing and employment building requirements	ensure a more vibrant economy by providing increased opportunities for less advantaged social groups to live and work on the Island. Positive effects, in the medium and long term.			

Summary

The policy seeks to address a specific, identified need for improved accessibility to affordable housing in rural areas on the Isle of Anglesey.

The use of a criteria based approach requiring access to facilities and sustainable transport links, provides strong, positive long term support for SA objectives seeking to improve community viability and cohesiveness. This approach is also particularly supportive of environmental SA objectives for climate change, as the promotion of development in locations where sustainable transport options are readily available, enables behavioural choices that will realise low carbon footprints (for both individuals and communities overall).

There is potential for even small scale (single) developments to have landscape impacts, and therefore the policy requirement to address potential effects through careful design provides appropriate mitigation for the appraisal to summarise that the overall effects of developments, both individually and cumulatively will be neutral in the medium and long term. The appraisal notes that historic landscape assets should also be considered in this context and recommends that any wording to protect landscape assets also encompasses the Island’s extensive heritage and wider historic assets, many of which lie in the rural landscape adjacent to rural settlements.

<p>Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters. (full policy wording set out in Report, Section 2)</p> <p>4. Within identified rural clusters new dwellings for affordable local community need will be permitted, subject to all the following criteria being met.</p> <ul style="list-style-type: none"> ▪ Local community need for an affordable dwelling has been proven. ▪ The site is located between or adjacent to existing buildings that are shaded on the maps included in Appendix 1 to this Draft Interim Policy document. ▪ The dwelling will need to successfully blend in with the pattern of surrounding development in terms of its design, plot size, layout of the plot, its construction materials and any relevant design guides. ▪ The size of the property is commensurate with the identified affordable housing need and within the size limitations for such dwellings. ▪ The dwelling seeks to minimise the impact on the landscape by utilizing and retaining natural features and any other boundary features present on the application site. 			
SA Objective	Assessment of Effects		Suggested Mitigation and Enhancement Measures
	Nature of the sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	Evidence and Reference (where available)	
<p>Objectives for soil, water and air are positively progressed by the policy, and the appraisal notes that even small scale developments can make positive contributions at a local level through sustainable design and build techniques. This approach ensures that housing stock is economic to run and viable in the long term, reinforcing the wider SA objectives for community and economy.</p> <p>Overall the draft interim planning policy on new dwellings in identified rural clusters effectively supports and progresses environmental, social and economic SA objectives; and no significant adverse effects are identified.</p>			

Table 1: Summary SA/SEA

Policy	SA/SEA Objectives									
	1 Biodiversity	2 Soil/ ground	3 Water	4 Air	5 Climate Change	6 Landscape	7 Health	8 Community	9 Cultural Heritage	10 Material Assets
Draft Interim Planning Policy on New Dwellings in Identified Rural Clusters	+	+	+	+	++	0	0	++	0	+

ANNEX 3: COMMENTS ON THE SA/SEA/HRA SCREENING DOCUMENT**B1) Do you agree with the key findings of the SA/SEA?**

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	The assessment has identified the particular sensitivity of much of Anglesey in relation to landscape.	Feel there is justification to further strengthen bullet point 5 of the policy to include incorporating the existing vernacular design where possible.	Detailed design policies of the Local plan and stopped UDP refer to this matter. For the purpose of clarity agree to amend the policy in line with this suggestion. Recommendation: Amend bullet point 5 of the policy through reference to existing vernacular design.
PT2/22	Agree with the 5 key findings		This is noted. Recommendation: No change to the policy.

B2) Do you agree with the HRA Screening Summary?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	Para 5.7 – would expect a short summary explaining why sites have been ‘screened out’ of the assessment at this stage.		In accordance with current practice, the HRA focus is on screening –in those European sites where there is the potential for a likely significant effect. All other European sites are effectively ‘screened-out’ of the process, but it is not necessary nor practicable to explain why sites were excluded. Recommendation: No change to the policy or HRA report.
PT2/06	Para 5.14 & 5.15 – The ‘in combination’	Any HRA required from the large	All housing approvals are monitored by the

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
	effects of this policy with other plans and projects needs to be closely monitored and the policy kept under review.	sites interim policy or other significant developments should also fully consider the implications of development from this rural clusters policy.	JPPU. Will ensure that it is possible to track development approved under this policy. Recommendation: Establishment of specific monitoring system for these clusters.
PT2/11	Too complicated to comment upon.	Needs to be simplified.	This is noted. Recommendation: No change to the policy.

B3) Are there any other matters you wish to raise in relation to the SA/SEA/HRA Screening Document?

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/06	Paragraph 2.5 & 2.6 – as there appears to be only one ‘reasonable alternative’ in this case they would expect an assessment of the ‘do nothing’ approach to be undertaken.	Due to the scale of the proposals envisaged under this policy this should not be seen as significantly undermining the assessment.	To ‘not prepare an interim policy’ is not considered a feasible alternative as it would not enable the facilitation of affordable housing to meet local needs, and would therefore be counter to national policy. Recommendation: Noted, however appraisal not required in line with comment above.
PT2/06	Note that there is no monitoring element and that this will be covered by future SA/SEA work on the JLDP.	Feel that some sort of record is kept of the number of permissions granted in rural settlements to better inform future baseline assessment.	All housing approvals are monitored by the JPPU. Will ensure that it is possible to track development approved under this policy. Recommendation: Establishment of specific monitoring system for these clusters.
PT2/07	Highlights potential impact issues should candidate sites put forward for Newborough be implemented.	None specified.	There seems to be some confusion over this policy and Candidate sites submitted in Newborough as part of the Ynys Môn LDP (Nov 2008). The JPPU will write to these individuals explaining the position in relation
PT2/09	Comments made about impact of development of certain proposed		

Reference Number	Comment Made (Summary)	Change Required (Summary)	Officers Comments / Recommendation
PT2/10	<p>candidate sites in Newborough.</p> <p>Comments made about impact of development of certain proposed candidate sites in Newborough.</p>		<p>to the Interim policy and the changes in the Candidate Site Register for the emerging plan.</p> <p>Recommendation: No change to the plan.</p>
PT2/11	<p>Too complicated</p>	<p>Simplified summary version would be more useful.</p>	<p>This is noted.</p> <p>Recommendation: No change to the policy.</p>
PT2/19	<p>Highlight key National and Regional policies and strategies that should be had regard to in relation to water and flood risk.</p>	<p>These should be incorporated within the Sustainability Appraisal document.</p>	<p>Relevant policies and strategies for all environmental topics are considered in the SA scoping report for the overarching LDP that has informed the SA Interim Framework. Notwithstanding there are references to relevant policy in the appraisal tables in the appendix.</p> <p>Recommendation: No change to the policy or SA document.</p>