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| MEETING | Joint Planning Policy Committee |
| DATE | 29 January 2016 |
| NAME | Anglesey and Gwynedd Joint Local Development Plan |
| PURPOSE | <ol style="list-style-type: none"> 1. To provide an overview of the process and the timetable to adoption; 2. To provide an overview of the representations made on the Deposit Plan together with an officer response and recommendation regarding each representation; 3. To secure approval for the submission of the Deposit Plan, subject to recommended changes and the required accompanying documents to the Welsh Government for independent examination; 4. To secure approval to publish the focussed changes for public consultation; 5. To secure, in accordance with Welsh Government guidance and in order to facilitate the efficient operation of the examination process, measures to permit effective dialogue between the independent Inspector and Council representatives. |
| RECOMMENDATION | <p>That the Committee:</p> <ol style="list-style-type: none"> 1. recommends that both Councils approve the revised timetable to adoption. 2. considers and approves the: <ol style="list-style-type: none"> a. Recommended responses to the representations (Appendix A) b. Proposed Focussed Changes to the Deposit Plan (Appendix B) c. Proposed Minor Changes to the Deposit Plan (Appendix C). 3. approves the submission of the Plan and an addendum of focussed changes to the Welsh Government for examination 4. approves the publication of the focussed changes for public consultation 5. gives delegated powers for the Cabinet Member (Planning and Regulatory – Gwynedd Council), Executive Member (Planning and Public Protection-Isle of Anglesey County Council) and/ or Senior Officers to agree potential changes to the Deposit Plan as part of the independent examination process, in accordance with Welsh Government guidance. |
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1. Background

- 1.1 The Isle of Anglesey County Council and Gwynedd Council resolved in its meeting on the 18th December 2014 to approve the Deposit Plan for public consultation. The public consultation about the Deposit Plan took place between 16 February – 31 March 2015. This report presents an overview of each representation and a recommended response (Appendix A). If a focussed or minor change is recommended these are set out in Appendix B and Appendix C, respectively.
- 1.2 Since the Deposit Plan was published for public consultation, the results of the local development plan preparation process refinement work has been published. This meant that there was no longer a requirement to consult on 'alternative sites' proposed by objectors to the Deposit Plan. This needs to be taken into account in the timetable set out for taking the Plan through to adoption.
- 1.3 The proposed timetable for taking the Plan through to adoption stage is currently set out in a Delivery Agreement, which was approved by the Isle of Anglesey County Council and Gwynedd Council in October and December 2013, respectively. It was submitted to the Welsh Government and supported by the Government in January 2014. Councils are required to ensure that the timetable set out in the Delivery Agreement is kept up to date.

2 Delivery Agreement – revised timetable

- 2.1 Table 1 below sets out the revised timetable for taking the Plan to adoption stage

| Stage in the preparation process | | Timetable | Revised timetable |
|----------------------------------|--|-----------------------------|-------------------|
| 1. | Preparation and publication of the final Delivery Agreement (<i>Regulation 5 - 10</i>) | January to November 2011 | n/a |
| 2. | Review and develop the evidence base | January 2011 - October 2012 | n/a |
| 3. | Participation Pre-deposit – prepare the pre-deposit documents that will outline the key objectives and preferred strategy (<i>Regulation 14</i>). This will not be a full draft of the Joint LDP | January 2011 - October 2012 | n/a |

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| 4. | Pre-Deposit Consultation - 6 week period (<i>Regulation 15</i>). Formal consultation on the pre-deposit documents and the sustainability appraisal report | May - June 2013 | n/a |
| 5. | Participation - further develop the evidence base and prepare the Deposit Joint LDP (full draft plan) which is based on the evidence base, including the response to the pre-deposit documents | July 2013 – December 2014 | n/a |
| 6. | Placing the Joint LDP and associated documents on deposit - 6 week consultation period (<i>Regulation 17</i>) | February 2015 – March 2015 | n/a |
| 7. | Consideration of comments about the Deposit Joint LDP (<i>Regulations 18 & 19</i>) | April 2015 – November 2015 | April 2015 – December 2015 |
| 8. | Publish comments on alternative sites, consulting upon them - a period of 6 weeks (<i>Regulations 20 & 21</i>) | June – July 2015 | No longer required |
| 9. | Submitting the Joint LDP to the Welsh Government for Examination (<i>Regulation 22</i>) | December 2015 | February 2016 |
| 10. | Independent Public Examination (<i>Regulation 23</i>) | April 2016 | February 2016 – January 2017 |
| 11. | Publication of the Inspector's Report (<i>Regulation 24</i>) | October 2016 | January 2017 |
| 12. | Adoption of the Joint LDP (<i>Regulation 25</i>) | December 2016 | February 2017 |
| 13. | Monitoring and Reviewing | Annual report | Annual report |

Table 1

3 The public consultation

3.1 The public consultation was carried out with a wide range of bodies and organisations as well as members of the public included on the Plan's consultation database. Each recipient received a letter by mail or e-mail, which provided information about the public consultation period. The letter was

accompanied by a copy of the statutory notice, a summary booklet, an overview leaflet, a schedule of supporting documents and details of drop in sessions held in key locations across the Plan area. The drop in sessions provided an opportunity to meet officers from the Joint Planning Policy Unit to ask questions about the Deposit Plan. The sessions supplemented other opportunities to contact the Unit by phone or e-mail throughout the public consultation period or by visiting its offices in Bangor. As is required by Regulations, a statutory public notice was placed in local newspapers. This notice provided a schedule of documents that were subject to public consultation and included information about the consultation period, and how to submit comments.

- 3.2 Community, town and city councils received hard copies of relevant inset maps, the Written Statement, as well as the documents referred to in paragraph 3.1 above.
- 3.3 A total of 1,700 representations were submitted about the Deposit Plan by 474 different respondents. Of the 1,700 representations around 25% were in support of specific elements of the Plan and around 75% objected to elements of the plan.
- 3.4 Of the representations about 63% were policy specific comments and around 37% were site specific comments, e.g. relating to settlement development boundaries, clusters, housing or employment allocations.

4 Considering the representations – the requirements

- 4.1 According to the Local Development Plan Regulations, the Plan must not be submitted to the Welsh Government for independent examination unless the representations have been considered.
- 4.2 In assessing the representations the Councils will need to consider if any changes are required in response to relevant representations or new evidence that, in the Councils' view, would not undermine its soundness. The tests of soundness are set out in Appendix Ch.
- 4.3 In considering the need for changes to the Deposit Plan in response to the representations received and the issues raised, the Councils must give due regard to the relevant Welsh Government and Planning Inspectorate guidance contained within:
 - 'Local Development Plan Manual – second edition – August 2015
 - 'Preparing for Submission - Guidance for Local Planning Authorities' - August 2015.

- 4.4 These documents aim to assist Councils that are preparing to submit local development plans for examination.
- 4.5 The assessment of representations or new information may therefore lead to potential changes which do not impact upon the soundness of the Plan or scope of policies. The pre-submission work can also highlight the need for minor editing changes including drafting and typographical amendments.
- 4.6 The guidance included in the documents referred to in paragraph 4.3 clearly advises that changes to the Deposit Plan should be avoided as much as possible. Specifically, the guidance requests that Councils consider whether a suggested change is necessary to make the Plan sound. If the answer is no, then there is no need to suggest a change to the Deposit Plan. If changes are necessary to ensure the Plan is sound, they should be kept to a minimum. The Councils must therefore consider what the implications of any proposed change are in terms of the soundness of the Plan, having had regard, for example, to the following:
- Does it accord generally with national policy and the Wales Spatial Plan?
 - Is it based on the evidence available at the pre-submission stage?
 - Is it supported by clear reasons based on the evidence?
 - Does it accord with the strategy of the plan?
 - How does it relate with the Single Integrated Plan?
 - Is it realistic and capable of delivery?
 - Whether it has any economic, environmental or social implications that have not already been covered in the Sustainability Appraisal/ Strategic Environment Assessment, Welsh Language Impact Assessment, Habitat Regulations Assessment?
 - Whether the proposed change requires the preparation of a revised sustainability appraisal; if so, whether it has been done or not or, if not, how is it to be done.
- 4.7 Appendix D to this report sets out advice from Iwan Evans, an independent planning consultant, about taking the Plan forward to submission stage. He has advised several local authorities in North Wales on planning policy matters and has represented Denbighshire County Council and Snowdonia National Park at Local Development Plan Examinations in Public. He continues to support Snowdonia National Park on planning policy issues and to advise local planning authorities.

4.8 With the above mentioned guidance in mind, the Committee may consider that some changes to the Plan should be made that would address some of the matters and issues raised by objectors in order to submit a sound Plan to Welsh Government for independent examination. These changes are described as:

- **Minor change** - a small change as a result of a drafting error or factual inaccuracy which has no bearing on a Plan's content and meaning, or
- **Focussed Change** – usually changes which, for example, improve the wording of policies and explanatory text as a result of representations, a change to reflect government policy. Such changes on their own, or in combination with others, do not undermine the plan's strategy, objectives or undermine its soundness. Focussed changes must be included in an addendum to the Deposit Plan at the submission stage. There is no statutory requirement to consult on these, but Welsh Government and the Planning Inspectorate advise Councils to do so.

4.9 Analysis of guidance and work associated with preparing other local development plans clearly demonstrate that a fundamental change should not be promoted at this stage. A **Fundamental Change** is described as a more drastic change which goes to the heart of the Plan in that it requires a shift in strategy and objectives and/ or the need for less or more allocated sites in order to accommodate it. The cumulative impact could be significant in that it would lead to a substantially different Plan. It could result in a Plan that would not accord with the sustainability appraisal and other appraisals of the Plan, all of which have informed its vision, objectives, strategy and policies.

4.10 If the Committee considers such changes are required at this stage it should not recommend proceeding to submission. It would then need to commission new evidence, including a sustainability appraisal to ensure compliance with the Strategic Environmental Assessment Regulations. It will then need to consult again on the deposit plan or even go back to the pre-deposit stage and consult on the sustainability appraisal in order to comply with the Strategic Environmental Assessment Regulations. All of this could present significant additional financial costs to the Councils and planning related risks in that both Councils would be without an up to date adopted development Plan for a number of years. The Councils would therefore be unable to ensure that they facilitate developments that meet the needs of residents or resist development that would not meet their needs.

4.11 Proceeding to submission stage with a Plan that incorporates a fundamental change presents a real risk that the Inspector could recommend that the Plan is withdrawn. An Inspector could reach this conclusion if concerns about the submitted Plan remain unresolved following an exploratory meeting with the Council and the Welsh Government. An exploratory meeting would enable the Inspector to determine: (i) the scale and nature of the work required to overcome the perceived shortcomings of the Plan (ii) how long will it take to do the work; and

(iii) what will the further work lead to. Normally, if the work required to overcome the shortcomings takes more than 6 months and that the results of the work would be likely to lead to a substantially different Plan.

5 Summary of representations and consideration of issues

5.1 The main issues (not exhaustive) emerging from the Deposit Plan consultation along with an outline of the responses to these issues are summarised below under the following headings:

- i. Scale of housing growth, including its relationship with the Welsh language;
- ii. Strategy to deliver housing growth, including its relationship with the Welsh language;
- iii. Spatial strategy, including the status of settlements;
- iv. Affordable housing;
- v. Local market housing;
- vi. Gypsy and Traveller accommodation needs;
- vii. Economy and employment, including provision of land;
- viii. Renewable energy, including wind turbines;
- ix. Protection of natural environment;
- x. Site specific allocations.

5.2 A summary of each representation, including representations not covered by the above headings, is included in Appendix A along with a response to each recommendation. Having carefully considered the issues raised from the consultation and following discussions and feedback from the Joint Local Development Plan Panel, there are no compelling or demonstrable reasons or sound evidence to propose fundamental changes to the Deposit Plan. It is considered that parts of the Deposit Plan would benefit from minor changes and focussed changes. These are changes to reflect points raised by objectors regarding updated circumstances; factual amendments, the need to clarify matters and to correct typing or cartographical errors. These are non-statutory proposed changes to the Plan, which will be published in order to assist the Inspector appointed to examine the Plan. Any minor or Focussed Changes suggested by the Councils at this stage to the Plan do not constitute formal changes to the Plan. They are changes that the Councils would like the Inspector to consider at the Examination. If any changes are upheld at Examination, they will be identified as changes in the Inspector's report and will form 'Material Arising Changes' and will be subject to public consultation before the Inspector publishes the binding report.

5.3 There is no statutory requirement to consult about Focussed Changes. Nonetheless, it is considered that the Inspector would benefit from gaining an understanding of the public's views about Focussed Changes. The Planning

Inspectorate advises that consultation about Focussed Changes should take place at the earliest opportunity to avoid delaying the examination process.

5.4 A schedule of proposed Focussed Changes is included in Appendix B to this report. Appendix C includes a schedule of minor changes. None of these proposed changes alter the strategy or the scope of policies contained in the Plan.

5.5 The proposed focused changes table contains the following information;

Focused Change Reference: This is a unique code for each proposed focused change (e.g. NF1, NF2, NF3....).

Proposed Focused Change (Text): The section of text affected by one or more proposed focused change is shown with 'tracked changes'. The proposed addition of text shown as **bold and underlined** and the proposed deletion of text shown with a ~~strikethrough~~. This allows readers to clearly see how the text is being changed so they do not have to refer back to the original Deposit Plan document.

Proposed Focused Change (Maps): Changes to the inset maps and constraint maps are shown using a dashed line to represent the amended boundary, a brief description of the change is also shown on the map.

Justification for change: A broad indication of why a change is being suggested. Changes are proposed as a result of the objections received during the Deposit Draft consultation period, and are mainly made to reflect the latest available information, to ensure accuracy or to ensure consistency throughout the Plan.

Scale of housing growth, including its relationship with the Welsh language

5.6 A number of representations were made regarding Policy PS13 and sections of the Plan that refer to the level of housing growth in the Plan. Policy PS13 sets out that the Plan will accommodate the requirement for 7,184 housing units during the Plan period. A 10% slippage allowance has been added in order to ensure deliverability of the housing requirement.

5.7 The representations either considered that the level of growth as set out in the Deposit Plan is right, the level of growth was too high, or the level of growth was too low. Those who considered that the level of growth was too high gave a number of reasons, including validity/ credibility of the projections, unrealistic/ optimistic projections, scale of growth not considered deliverable and the impacts of this level of growth on the well-being of the Welsh language and infrastructure. In making representations about the impact on the well-being of the Welsh language objectors question the credibility of the Welsh Language Impact Assessment, which has informed the Sustainability Appraisal.

- 5.8 Those who are seeking a higher level of growth include those that suggest the Plan should revert to the level of growth set out in the Preferred Strategy (i.e. 7,665), those who query the slippage allowance, the use of windfall sites, and those that query whether a vacancy rate has been applied to convert household projections to dwelling requirements.
- 5.9 Welsh Government policy makes it absolutely clear that the starting point for planning for new homes is the population and household projections it publishes for each Council area. Therefore, the Councils used the 2011-based projections (which were published after the Preferred Strategy stage) as the most up to date 'starting point'. Analysis undertaken for the Council by Edge Analytics produced alternative scenarios. Consideration of the official Welsh Government projections, alternative scenarios and consideration of other relevant factors provided the justification for the Plan to set a level of growth of 7,184 housing units. The methodology included a vacancy rate allowance and the slippage allowance is considered reasonable based on an analysis of other plans and pattern of development in the Plan area. A level of growth below that included in the Plan is considered to fall short of delivering the overall Plan strategy, would not effectively respond to evidenced requirement, for example, to respond both Council's economic development strategies, and therefore would not represent a sound approach. Such an approach could result in the planning for static growth or even decline. It would result in less affordable housing being delivered through the planning system and less certainty that proposals would yield an adequate mixture of housing units across the Plan area. The Sustainability Appraisal (informed by the Welsh Language Impact Assessment) confirmed the soundness of the approach set out in the Deposit Plan.
- 5.10 No alternative assessments or modelling evidence were provided by the objectors. On this basis no compelling or demonstrable reasons have been given to justify lowering or raising the housing requirement.
- 5.11 Nonetheless, the objections have highlighted a need for minor and focussed changes to certain policies and supporting text in order to address matters raised in objections and to ensure the policies and text are consistent, accurate and clear. These changes are set out in Appendix B and Appendix C, and include the following (not exhaustive):
- i. Reference to vacancy rate in supporting text
 - ii. Reference to basis for slippage allowance in supporting text
 - iii. Reference to new topic papers about the housing trajectory and settlement profiles
 - iv. Amendments to supporting text to improve clarity about the Welsh language
 - v. Include an additional policy about phased housing development
 - vi. Amend Policy ISA1 Infrastructure Provision to refer specifically to the Welsh language

- vii. Amend Policy PS1 Welsh language and culture to refer to thresholds where Welsh Language Action Plans or Linguistic Impact Assessment will be required
- 5.12 In addition, relevant Topic Papers and the Welsh Language Impact Assessment Report will be amended as required to reflect up to date information and improve clarity.

Strategy to deliver housing growth, including its relationship with the Welsh language

- 5.13 A number of representations were made about Policy PS15, which sets out the Plan's spatial strategy in terms of housing development, and other sections of the Plan that describe the housing spatial strategy. The Deposit Plan proposes to provide new homes over the Plan period by a combination of:
- i. Dwellings already built (since 2011)
 - ii. Dwellings under construction
 - iii. Adjustments to housing stock over Plan period
 - iv. Windfall allowance – sites/ buildings that may come forward for dwellings in Centres, Villages and Clusters
 - v. Housing allocations in Centres and Service Villages
 - vi. A slippage allowance of 10%
- 5.14 A Sustainability Appraisal of all settlements was undertaken in order to identify each settlement's role and function in the Plan area. Based on this analysis a Settlement Hierarchy was identified. The spatial strategy was established in the first place during the process of developing the Preferred Strategy of the Plan on the basis of evidence and public participation. 55% is directed to the higher order centres, 20% is directed to Local Service Centres and 25% is directed to Villages, Clusters and the countryside. In spatial terms, the strategy is to ensure that the detailed and strategic policies of the Plan promote housing developments that address the expectations of the Vision and Strategic Objectives of the Plan and align with the expectations about the creation of new jobs during the Plan period. It is going to ensure that development is directed to settlements that are sustainable in terms of size, function, character, facilities, transport links, social and environmental inclusion. Therefore there will be a sustainable pattern of settlement with viable communities, which aligns with the sustainability principles that underpin the Plan.
- 5.15 Most representations focussed on specific sites, particularly those who proposed additional/ alternative sites, rather than to the overall approach to delivering new homes. These site specific representations are dealt with separately.
- 5.16 It is relevant to note that the Welsh Government (Planning Service) does not question the Plan's spatial strategy.**

- 5.17 Those that do refer to the overall approach behind the spatial distribution present differing views: some seek to promote more or less housing in the main Centres, others wish to direct more/ less to some Local Service Centres, whilst others wish to see more homes facilitated in the countryside.
- 5.18 Some consider that the ‘windfall’ assumptions are too high. However, no compelling evidence has been presented to suggest that the approach is fundamentally unsound, i.e. that new homes won’t continue to be delivered on small ‘windfall’ sites within development boundaries of local/ rural/ coastal villages or on the edge of their development boundaries; that the Plan area’s Centres won’t continue to deliver new homes within existing buildings and brownfield sites.
- 5.19 Some have raised the need to address the impact of distributing homes as set out in the Plan on the Welsh language.
- 5.20 It is considered that no realistic alternative strategies or evidence to address the level of growth, to reflect the characteristics of the Plan area, and the need to promote sustainable development have been submitted.
- 5.21 Appendix A and B set out a proposed focussed change whereby the explanatory text and Policy PS15 clarifies the distribution thresholds and therefore align with the Plan’s monitoring framework. It is considered that some of the focussed changes described in 5.10 above address matters raised in relation to the Welsh language.

Status of settlements, including role of clusters

- 5.22 National planning policy states that local planning authorities need to find a sustainable settlement network, which meets the requirements of the economy, the environment and health while respecting local diversity and protecting the character and cultural identity of the communities. The Deposit Plan identifies a hierarchy of towns and villages with a specific role and function. A methodology has been developed and published in “Topic Paper 5 Developing the Settlement Strategy” to categorise settlements on the basis of their role, function, range and choice of specific facilities and services. 29 factors/ services/ facilities are assessed. Specific services/ facilities are described as being ‘key’ services, as defined by the Welsh Index of Multiple Deprivation.
- 5.23 The Plan refers to the role of settlements within the Executive Summary in Chapter 1, the Plan’s Strategy in chapter 6 (specifically the Housing Strategy), Policy PS15 which refers to the Settlement Strategy, and in policies TAI 14 to TAI 18, which are policies regarding the various categories of settlements within the plan. Objectors have referred to these various parts of the Plan. Objectors have

also referred to the role allocated to individual settlements as part of their justification to include additional housing site(s) within the plan.

- 5.24 Most objectors have sought to re-categorise the settlement in question so that it is included in a higher order category. One objector has sought to re-categorise the settlement to a lower order category, depending on the outcome of representations about specific policies. Some objectors have sought to include an additional settlement within the 'Clusters' category. Welsh Government questions the basis for identifying so many settlements in the clusters category, referring to the low score given in the sustainability matrix in Topic Paper 5.
- 5.25 None of the objectors have challenged the methodology described in Topic Paper 5. Some objectors have referred to specific services/ facilities located in the settlements in question. However, most of these have already been accounted for or are considered to contribute to employment opportunities rather than community facilities/ services. Analysis of evidence submitted with an objection relating to Tywyn has revealed the need to adjust its score and Penygroes' score, but that this does not change either settlement's status within the Settlement Hierarchy.
- 5.26 Appendix A to this report sets out the need to add to the extent of the Waun (Penisarwaun) Cluster, which is identified in Appendix B as a Focussed Change. It is also proposed that Topic Paper 5 is amended to reflect any revised scores as well as work to clarify the role of Clusters and to justify retention of the settlements identified in Policy TAI 18.

Affordable housing

- 5.27 The affordable housing policies (Policy PS14, TAI 9 and TAI 10) in the Deposit Plan aims to assist the planning system help the Council in meeting evidenced housing need by seeking an appropriate housing contribution from new residential development. Policy TAI 9 sets a minimum indicative target of 15% or 25% depending on the local market area and subject to negotiation at a planning application stage. The threshold to trigger an affordable housing requirement depends on the settlement's status in the Settlement Hierarchy.
- 5.28 Representations can be summarised as follows (not exhaustive):
- i. Concerned that indicative affordable housing targets are lower than in existing plans;
 - ii. Unclear about the basis for the overall affordable housing target;
 - iii. Unclear as to whether viability of schemes will be considered;
 - iv. Welsh Government consider that the exceptions sites policy does not align with national planning policy and guidance
 - v. In contrast, there was support from social housing providers and the rural housing enabler to the exceptions sites policy.

- 5.29 It is emphasised that targets are derived from the findings of the affordable housing viability study, which assessed the viability of a range of housing scenarios for different types of development types with varying levels of affordable housing. The report presented single tier, two tier and three tier affordable housing target which applied to different house price areas. An analysis of the report favoured a two tier approach.
- 5.30 The overall affordable housing target applies the indicative affordable housing targets and other factors to provide a target that could be delivered via the planning system. Appendix A recognises the need to amend explanatory text to clarify this approach. Similarly minor additions are required to explain that viability would be considered at a planning application stage.
- 5.31 With regard to Welsh Government's comments about the rural exceptions sites policy, which could facilitate a limited proportion of market housing on exception sites, it is considered that the policy does align with TAN 6. Nonetheless, it is proposed that Topic Paper 3 should be revised to update the evidence to better explain the basis for a limited number of market housing in exceptional circumstances on rural exceptions sites.

Local market housing

- 5.32 Policy TAI 5 promotes local market housing, along with local need affordable housing, in specific settlements. The selection of the settlements is based on a detailed analysis of factors that are considered relevant in order to determine whether local households are able to purchase or rent a property. The research work is set out in Topic Paper 17.
- 5.33 Objectors, including Welsh Government, raised the following matters:
- i. Appropriateness / need for the policy – i.e. it does not conform with Planning Policy Wales; it will weaken communities socially and economically; it will lead to social imbalance; it duplicates affordable housing provision; it will mean that it is not possible to provide the required level of housing and it excessively restricts development.
 - ii. Need to expand it to be relevant for a wider area, mainly on the basis that this would benefit the well-being of the Welsh language.
 - iii. Whether the use of Section 106 Agreements to restrict occupation of the houses to those that are eligible is appropriate.
 - iv. Whether using ward level data excluded specific settlements
- 5.34 Whilst it is accepted that the Policy deviates from national planning policy, paragraph 9.2.4 indicates that this is possible provided that it can be substantiated with robust evidence: *“If these policies need to diverge from national policies in order to meet specific **local housing needs for market housing** (which normally would have no occupancy restriction), local planning authorities will need*

*carefully to justify **the variation** with robust evidence that they deem appropriate”* Topic Paper 17 provides that evidence.

- 5.35 In terms of including additional settlements within the Policy’s remit officers have re-examined the evidence and consider that Borth y Gest and Morfa Bychan should be added to the list of settlements. In undertaking the assessment of objections officers noted that although Topic Paper 17 had identified that the wards covering Llangian and Rhoshirwaun merited inclusion within Policy TAI 5, the settlements had not been included. It is proposed that this error is corrected. The analysis of the evidence hasn’t revealed that additional areas should be included.
- 5.36 It is proposed that wording is amended to ensure it would be possible to use any suitable mechanism required to manage occupation of the new homes, rather than limit it to Section 106 Agreement.

Gypsy and Traveller Accommodation

- 5.37 The Deposit Plan includes policies that safeguards existing provision, allocates an additional site and provide a framework for assessing proposals for new Gypsy and Traveller sites in response to need evidenced in the Gypsy and Traveller Accommodation Needs Assessment. Objectors, mainly Welsh Government, refer to the need to ensure that the Plan addresses all of the need identified in the most up-to-date Needs Assessment. Comments are also made about wording included in the Policy and supporting text.
- 5.38 Since publishing the Deposit Plan the Joint Planning Policy Unit has been working closely with Housing Services colleagues to undertake a revised Needs Assessment and to identify solutions, demonstrating both Councils continued commitment to responding to the needs for residential pitches and stopping places to cater for those that travel through the area.
- 5.39 In response it is proposed that a larger extension than shown in the Deposit Plan to the existing site near Llandygai Industrial Estate is allocated. This will address a short term need as well as provide an opportunity for providing additional pitches later on in the Plan period. Other focussed and minor changes include amendments to Policy and supporting text wording in order to reflect the aforementioned changes. However it is acknowledged that this does not satisfy the overall level of need identified in the Needs Assessment. This is a reflection of the need for additional discussion with colleagues and stakeholders. The progression of the Plan through to examination will allow this issue to be more thoroughly explored. It is considered that the identified focussed changes demonstrates both Councils continued commitment to responding to the needs for residential pitches and stopping places to cater for those that travel through the area.

Economy and employment

- 5.40 The Deposit Plan makes provision for a range and choice of new employment sites for different types of employment and different geographical locations to effectively deliver the level of growth set out in the Plan. This approach includes safeguarding existing employment land and allocation of additional sites. The level of provision aligns with the role of the Plan area, particularly Anglesey, as an important economic driver in North West Wales.
- 5.41 In response to comments from Welsh Government regarding the level of provision it is considered that the Plan meets the tests of soundness without the need for changes relating to this matter. Most of the safeguarded and allocated sites on the Island benefit from an Enterprise Zone status and fulfil one of the Plan's objectives, i.e. to ensure that a network of employment sites and premises of a size and quality is safeguarded and allocated in sustainable locations that best meet the needs of existing businesses and are able to support the growing sectors of the local economy, attracting investment, and retaining and increasing the number of indigenous jobs.
- 5.42 The sites selected to be safeguarded and allocated have been defined on the basis that the Employment Land Review deemed that they display strong potential to continue to play an important economic role, whether this is to provide local employment in key locations or whether the sites are more strategic in size, position or function.
- 5.43 In terms of comments relating to alternative uses on sites, it is considered that Policies CYF 3 and CYF 4 provide sufficient flexibility, without the need for changes.
- 5.44 In terms of flood risk it is acknowledged that a few sites are within flood zones C1 or C2. However, these sites comprise existing developed areas within Centres which perform an important economic role. The flood consequences of any proposals to redevelop sites within these sites can be assessed at the planning application stage in accordance with guidance set out in TAN15 flood risk.
- 5.45 In response to comments relating to Policy PS 8 and Policy PS 9 and their supporting text, which relate to Wylfa Newydd and other major infrastructure projects, it is considered that a series of minor and focussed changes are required for clarity and correctness.

Renewable energy, including wind turbines

- 5.46 The Deposit Plan sets out a range of policies relating to managing the development of renewable energy technologies that are consistent with national policy for the promotion of renewable energy generation.
- 5.47 A study was undertaken to provide an evidence based assessment of the relative sensitivity and capacity of the Plan area and Snowdonia National Park landscapes to accommodate specific types of development at varying scales. The development included wind turbines and solar farms. An additional study was commissioned to determine the appropriateness of applying minimum separation distances between wind turbines or pylons and residential properties, to protect residential visual amenity.
- 5.48 Most objectors refer to adopted Supplementary Planning Guidance relating to wind turbines, proposing that similar criteria are included in the Plan. In relation to these comments it is considered that the Plan meets the tests of soundness without the need for the changes proposed by the objectors relating to this matter other than: including a reference to the amenities of tourist related accommodation; installing underground cables where appropriate, especially in a sensitive area; including a reference to the setting of AONBs and SLAs; and changing the terminology in Welsh from “melinau gwynt” to “tyrbinau gwynt”.

Protection of natural environment

- 5.49 The Deposit Plan sets out a range of policies relating to the protection of the natural environment. Natural assets are key to the Plan area’s character, value, distinctiveness and sense of place and include the undeveloped countryside and coast, biodiversity interests, etc. In accordance with national planning policy, the Plan doesn’t seek to repeat national planning policy or legislation.
- 5.50 Objectors expressed concern that Special Landscape Areas boundaries have been amended compared to the existing Ynys Mon Local Plan. It is considered that the Plan meets the tests of soundness without the need for changes relating to this matter. The areas selected to be identified as Special Landscape Areas have been defined on the basis that they are deemed to display the character and qualities of the landscape considered to be of particular value in the local context. Objectors have not presented compelling evidence to indicate that additional areas should also be identified.

Site specific allocations

- 5.51 A number of site specific representations were received relating to proposed deletions of existing allocations in the Deposit Plan, new alternative sites, proposed boundary changes. In terms of responding to these representations it is

important to note that extensive evidence contained in supporting documentation demonstrates that allocations (housing and employment) and extent of development boundaries have been carefully considered in consultation with a number of stakeholders. The Sustainability Appraisal and the Habitat Regulations Assessment has also informed the process.

- 5.52 Therefore, the sites allocated within the Plan are consistent with the overall Plan Strategy and are deliverable within the Plan period to enable the Plan meet the identified housing and employment needs of the Plan area up to 2026. On this basis no additional sites are required as allocations in the Plan.
- 5.53 However objections on the basis of risk of flooding relating to site T4 in Bangor and on the basis of biodiversity issues relating to site T58 in Bethel necessitate their removal in order to ensure the Plan reflects the updated information and ensure the Plan's internal consistency. Alternative sites are proposed that align with the Plan's spatial strategy.
- 5.54 In terms of objections relating to amendments to development boundaries it is proposed that amendments are justified in limited instances that include Bangor, Llanberis, Blaenau Ffestiniog, Pwllheli. (not exhaustive)

6 Assessments

- 6.1 As with all stages in the Plan preparation process, the following assessments have been made of the proposed changes in accordance with the relevant legislation and regulations:
- (i) Sustainability Appraisal (including Strategic Environmental Assessment and informed by the Welsh Language Impact Assessment);
 - (ii) Habitat Regulations Assessment.

7 The independent examination process

- 7.1 Once the Councils have submitted the Deposit Plan and all relevant documentation to the Welsh Government, the Planning Inspectorate will announce that an Independent Inspector has been appointed on behalf of the Welsh Government to examine the Plan. The examination process will then commence straight away. Should the Inspector seek clarification on any significant issues relating to soundness, an Exploratory Meeting may be held ahead of any hearing. Otherwise a Pre-Hearing Meeting will take place to discuss the arrangements for hearings. After considering all of the evidence, the Inspector will prepare a binding report that will be sent to the Councils.
- 7.2 In accordance with Welsh Government guidance and in order to enable the efficient and timely running of the examination, measures should be put in place to permit effective dialogue between the independent Inspector and Councils'

representatives. It is therefore proposed that delegated powers are vested with relevant Head of Services, Senior Managers and Managers Officers so that they can negotiate issues, agree amendments and respond to requests for further information as required by the Inspector during the examination process including the Hearing Sessions. Should discussions or requests for further information involve potential significant changes to the Plan, the relevant Officers will liaise with the Cabinet Member for Planning and Regulatory Services (Gwynedd Council) and Executive Member for Planning and Public Protection Services ahead of the relevant Hearing Sessions or deadline for providing information.

- 7.3 A Programme Officer has already been appointed to manage the day to day arrangements and running of the examination process.

8 Documents to be submitted

- 8.1 The Local Development Plan Regulations state that the following documents have to be sent to the Welsh Government and the Planning Inspectorate:

- (i) The Deposit Plan, including an addendum that sets out the Focussed Changes;
- (ii) Consultation Report;
- (iii) Sustainability Report;
- (iv) Delivery Agreement;
- (v) Copy of representations received regarding the Deposit Plan
- (vi) Supporting documents the Councils consider relevant to the purpose of preparing the Plan.

9 Recommendation

- 9.1 That the Committee:
- a. recommends that both Councils approve the revised timetable to adoption as set out in Table 1.
 - b. approves the:
 - i. Recommended responses to the representations (Appendix B)
 - ii. Proposed Focussed Changes to the Deposit Plan (Appendix C)
 - iii. Proposed Minor Changes to the Deposit Plan (Appendix Ch).
 - c. approves the submission of the Plan and an addendum of focussed changes to the Welsh Government for examination
 - ch. approves the publication of the focussed changes for public consultation
 - d. gives delegated powers for Senior Officers (as set out in 7.2 above) and/ or the Cabinet Member (Planning and Regulatory Services – Gwynedd Council), Executive Member (Planning and Public Protection - Isle of Anglesey County Council) to agree potential changes to the Deposit Plan as part of the independent examination process, in accordance with Welsh Government guidance.

