



Elliw Owen
Head of Planning Policy
Awdurdod Parc Cenedlaethol Eryri
Swyddfa'r Parc Cenedlaethol
Penrhyndeudraeth
Gwynedd
LL48 6LF

Ein cyf : Our ref: qA1255872

17 August 2017

Dear Ms Owen,

Snowdonia National Park Authority – 1st Revision (Short Form Procedure) Deposit Plan – Regulation 26B Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding the Snowdonia National Park Authority Local Development Plan (LDP) 1st Revision (Short Form Procedure) documents. We acknowledge that the preparation of a LDP and its supporting evidence is a significant undertaking and recognise the amount of work your Authority has undertaken to date in moving the plan forward from the Review Report to the Deposit stage.

The Welsh Government is broadly supportive of the approach in your Deposit plan, which seeks to identify small scale provision in the most sustainable settlements to meet locally identified need. The proposed level of housing growth is comparable with delivery rates in the adopted LDP and on this basis we generally support the level of growth put forward in the plan.

As you can appreciate, demonstrating delivery of the strategy will be critical and this should be supported by your Authority's evidence. We elaborate further within the annex to this letter. The development planning system in Wales is evidence led and demonstrating how a plan is shaped by the evidence will be a key requirement at the examination. Demonstrating the delivery and viability of all sites in the LDP is key, particularly those sites that are integral to the strategy and plan objectives.

Without prejudice to the Minister's powers to intervene later in the process and to the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process. We have considered your Deposit LDP in accordance with the requirements of

national planning policy and the adopted LDP and from this our representation relates largely to **points of clarity** that we envisage will be discussed at the examination.

The Welsh Government's representation is set out by topic area in the attached annex. We have indicated where further clarity and/or work is required moving forward. Some key areas include:

- Housing allocations – viability and delivery
- Snowdonia Enterprise Zone
- Gypsy and Travellers
- Minerals
- Renewable Energy, and
- Welsh Language

It is for your Authority to ensure the LDP is 'sound' when submitted for examination and it will be for the Inspector to determine how the examination proceeds thereafter. You should consider how you could maximise the potential of the plan being found 'sound' in advance of the examination. If you would like to meet to discuss matters arising from this formal response to your Deposit LDP then please do not hesitate to contact me.

Yours sincerely,



Mark Newey
Head of Plans Branch
Planning Directorate

Annex to Welsh Government letter (17 August 2017) in response to the Snowdonia National Park Authority 1st Short Form Revision Deposit Plan

Ref No.	Welsh Government Comment
Strategy and Spatial Distribution	
No.57 No.117	<p>The strategy in the National Park has remained unchanged making small-scale provision to meet locally identified need. The Welsh Government does not object to the principle of this approach.</p> <p>Strategic Policy C Spatial Development Strategy seeks to direct development to the more sustainable Local Service, Service and Secondary Settlements, which account for almost 80% of all housing growth (Change 117). Across all settlement tiers, the Park has continued to limit new housing development by restricting growth to a percentage of the overall housing requirement in each tier. The Welsh Government would welcome clarification on how the percentage targets and ranges in Policy C (amended by Change 57) have been calculated including how they will be implemented and monitored. Clarification is also sought on how the ranges relate to the housing components proposed by Change 117. For example, Policy C restricts housing development to a range of 17%-34% in Local Service Centres. How does this range relate to 24% in Local Service Centres from the table on page 74 (Change 117)?</p>
Housing Provision and Requirement	
No.113 No.113 No.114	<p>The housing figures in the plan have been considered against the Welsh Government 2013-based household projections, as well as past completions, the capacity of the area to accommodate additional growth and the key issues the plan is seeking to address. In July 2017, the Welsh Government released their 2014-based population and household projections for National Parks in Wales. The Authority should explain the implications (if any) of the latest 2014-based projections on the plan.</p> <p>Changes 113 and 114 identify a housing provision of 810 units to deliver a requirement of 770 dwellings (inc.5% flexibility). This level of housing growth equates to 51 units per annum, which is comparable with delivery rates in the extant plan. On this basis the Welsh Government does not object to the level of housing provision. We consider it necessary for the level of housing provision, plan requirement and a list of all the allocated housing sites to be included in policy, not the supporting text. This will ensure planning decisions can be linked to policy and will ensure effective monitoring of the plan.</p>
Delivery and Housing Supply	
No.115 No.117 No.147	<p><u>Delivery and Site Allocations</u></p> <p>In Changes 115 and 117, the contribution from allocated sites is 23% of plan provision. Of the 16 allocated sites listed (in Change 147), 11 are identified for 100% affordable housing, which accounts for almost 70% of all allocations in the plan; a figure well above that in the adopted LDP. The Authority should robustly evidence the delivery of allocations for affordable housing. The evidence base supporting the plan alludes to issues around mortgage lending and finance availability in this respect, and lower completion rates for affordable housing. Does the Authority have evidence in delivering this scale of sites for affordable housing? The flexibility afforded in paragraph 5.19 to the release of 100% affordable housing sites for market dwellings should be explained and considered in the context of Strategic Policy G Housing.</p> <p>The Authority should evidence the delivery of sites, any key infrastructure</p>

	<p>requirements and associated costs, together with an indication of key timings, phasing and funding mechanisms. This will be essential to ensure all allocations are deliverable over the plan period.</p> <p>We note the Authority has produced a 5-year land supply calculation table in Background Paper 7A (Appendix 2), which will underpin a future housing trajectory. Notwithstanding this, the land supply table in Appendix 2 must be calculated on the requirement of 770 dwellings with the associated graph totalling plan provision (of 810 units) to include flexibility. In essence a trajectory has two elements. One that demonstrates flexibility over the plan period (graph) and one that demonstrates a 5 year supply linked to the housing requirement (supply table). A housing trajectory will greatly assist all parties to understand the delivery of sites over the plan period. The trajectory should be supported by an analysis and understanding of lead-in times for sites, the interrelationship of sites, potential constraints, costs, infrastructure requirements and funding streams, together with robust assumptions on windfall sites to demonstrate a 5-year housing land supply throughout the plan period.</p> <p><u>Clarity of Housing Components</u></p> <p>No.117 Background Paper 7: Housing highlights that some of the allocated sites benefit from full planning permission (in part) with completions on site (Appendix 2). Notwithstanding this, the planning status of some allocated sites is unclear in the housing components table and the Authority should ensure there is no double-counting between allocated, completed and committed sites (Change 117). For example, Land adjacent to Capel Horeb, Dyffryn Ardudwy, was allocated for 9 units in the adopted plan and the Authority has since confirmed planning permission was granted for 7 units (Appendix 2). The Park has now re-allocated the site for 5 dwellings. Is the planning status of this site accurately reflected in the housing components? The Authority should be clear on the development status of each allocation to accurately inform the plan's housing provision and components of supply.</p> <p>No.115 The contribution from windfall sites in Change 115 comprises small sites only. The Authority should explain why large windfall sites (of 5+ units) have not been included in the housing supply? Is it realistic to assume that large sites will not come forward for development over the plan period? Indeed, it would appear that of the 35 large sites with planning permission in the 2016 JHLAs, many were not allocated in the extant plan. The Authority should explain the robustness of this approach and consider whether the current windfall allowance is robust, and consider the need for an indicator in the monitoring framework to record the take-up of large windfall sites.</p>
Affordable Housing Viability	
No.152	<p><u>Affordable Housing Study and Site Viability</u></p> <p>The Welsh Government requires clarification on the viability of sub-market areas in Tables 3.7 and 3.8 when considered against benchmark land values (BLVs). Are the BLVs in paragraph 4.10 of the study spatial representations of the 'top, mid and lower' sub-market areas across Snowdonia or do they relate to the 'top, mid and lower' residual values? As currently presented it is difficult to work out what settlements are viable at what percentage in some cases. The viability of market areas should clearly inform the plan's affordable housing requirements, but at present there is no clear alignment between Strategic Policy G Housing and the supporting evidence. For example, Policy G requires Local Service Centres to provide 20% affordable housing on sites of 5+ units. How does this requirement align with the BLV and negative residual value (RV) in Dolgellau? (30dph in Table 3.7). Equally, the Authority should explain how viability has influenced the affordable housing requirement on allocations in</p>

the plan. For instance, the study recommends an affordable housing target ‘of around’ 20% in Harlech (paragraph 5.4). How does this relate to 33% requirement on the allocation adjacent to Penyrhwylyfa, Harlech? The Authority should ensure the plans affordable housing targets are robust and supported by local evidence. Are there local circumstances such as delivery mechanisms and land ownership considerations that impact on viability? In addition, **there is no evidence to support the thresholds in Policy G**; the appropriateness of the thresholds will need to be justified. Finally the authority should include a density policy in the LDP, 30dph has been used in the viability work and included within (Background Paper 7A, paragraph 18). This will aid effective implementation and monitoring of the plan.

Gypsy and Travellers

National Policy	We note that a Gypsy Traveller Accommodation Needs Assessment (GTANA) has been undertaken by both Gwynedd and Anglesey (2016) and Conwy (2017) which covers the National Park. However, neither GTANA’s cover the whole plan period up to 2031. The Authority should ensure that it has assessed the need for Gypsy and Traveller provision for the entire plan period up to 2031 and make appropriate provision.
No.157	The Authority should review the criteria in Policy 13 to ensure they are not overly restrictive. Criterion i. does not accord with Welsh Government Circular 30/2007 (Annex B) and should be deleted. The criterion is not considered to promote the equal rights of gypsy and travellers with all other citizens, as the requirement to ‘evidence need’ would not be a restriction placed on non-gypsy and travellers. Criterion v. should also be reconsidered in this respect.

Employment

No.173 No.181 No.185 No.187	<p><u>Snowdonia Enterprise Zone</u></p> <p>The EZ comprises of 2 sites; a 50ha site around the former Trawsfynydd nuclear power station and a 229ha site at Llanbedr Airfield. The plan allocations do not correspond with the Welsh Government’s EZ designation. Any deviation from the Welsh Government’s designation will need to be clearly evidenced and justified by the Park Authority. It will be for the relevant Government Department to comment on the validity of this approach.</p>
No.170	<p><u>Safeguarding Policy and the Rural Economy</u></p> <p>The Authority may wish to consider a new safeguarding policy for key existing employment sites (e.g. Bala Enterprise Park) to protect and retain employment uses up to 2031. On such sites, Policy H (Criteria vii-ix) would not apply.</p> <p>Policy 19 is overly restrictive in rural areas outside defined settlement boundaries, as only the conversion of existing small scale employment opportunities will be supported. The policy should allow new, conversions and expansion for an existing business.</p>

Tourism

No.210	The Welsh Government supports the use of holiday occupancy conditions (in paragraph 6.52) safeguarding the countryside from inappropriate development. To ensure compliance with national policy and TAN 13, paragraph 6.5.2 should clearly state the occupancy restriction of 28 days applies to the occupant and not the ‘occupation’ of the accommodation.
--------	---

Natural Environment

No.71 No.79	The Authority should show spatially the Biosphere Reserve on the Proposals Map in order to successfully implement the requirements of Policy 2.
----------------	---

Minerals	
National Policy	The Authority should safeguard both category 1 and category 2 mineral resources on the Proposals Map in accordance with the BGS Aggregates Safeguarding Map of Wales (see CPO letter, November 2012). This will support the Authority's approach to promote the use of slate for new buildings (LDP, paragraph 3.43) and ensure consistency with neighbouring Authorities and across Wales. The Aggregates Safeguarding Map of Wales incorporates a 'safeguarding margin' to minimise risk of sterilisation. There is no need for the Authority to apply any form of 'buffer zone' to mineral safeguarding areas.
No.93 No.96	<p>Buffer zones should only exist around permitted and proposed sites, in line with national policy (MTAN 1, paragraphs 70 & 71) and the Authority should ensure buffer zones are included around any existing mineral workings and supported by a suitable policy. Paragraph 3.2 of the Minerals Background Paper implies that buffer zones will be placed around safeguarded areas (resources), when they only need to be placed around permitted sites (reserves). The paragraph also implies that buffer zones will be placed around existing settlements, which is not a requirement of national policy.</p> <p>For criterion iii) of Strategic Policy E Minerals Safeguarding, we suggest the addition of 'or sterilise the resource' to be in line with national policy (PPW, paragraph 14.7.3).</p>
Waste	
No.49 No.99	References to revoked Regional Waste Plans (RWPs) should be deleted (where appropriate). Paragraph 3.45 (change 99) would benefit from reference to policy in the Collections, Infrastructure and Markets Sector Plan and the capacity requirements for waste facilities established through regional monitoring (as set out in TAN 21).
No.101	The Authority should ensure Policy 4 provides a detailed framework against which to assess applications for new waste management facilities. As worded, the policy relates solely to 'environmental impacts' and could usefully be expanded to include assessment criteria on amenity, transport and access, amongst others. The Policy also supports small-scale waste recycling on industrial sites and the Authority should identify the existing industrial sites it considers appropriate for such facilities (TAN 21, paragraph 3.21) and also include a reference in Policy 4 to the requirement for a Waste Planning Assessment to be submitted with applications for a waste management facility classified as a disposal, recovery or recycling facility (TAN 21, paragraph 4.2).
Renewable Energy	
No. 85	National policy identifies Local Authority-wide thresholds for renewable energy between 5MW and 25MW for onshore wind and between 5MW and 50MW for all other technologies. The plan should include a new criteria based policy to assess applications for renewable energy development either-side of the 5MW threshold for different relevant technologies and provide clarity on the relationship to Local Authority-wide thresholds as outlined in national policy (PPW, Figure 12.2) at paragraph 3.31 (Change 85) of the plan.