

**Ceredigion LDP
Regulation 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

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| P1 - Prepared in accordance with the Delivery Agreement including the CIS | |
| <u>Comments</u> | <u>Suggested Actions</u> |
| We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case. | N/A |
| P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment) | |
| <u>Comments</u> | <u>Suggested Actions</u> |
| <p>SA/SEA: We note that: the Preferred Strategy has been subject to SA/SEA.</p> <p>Habitats Regulations Appropriate Assessment (HRA): We note that the Preferred Strategy has undergone the first stage of the HRA assessment in discussion with CCW.</p> | The authority must be able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations and has had regard to the European Protected Species and that the deposit plan has had regard to the findings. |

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| C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas. | |
| <u>Comments</u> | <u>Suggested Actions</u> |
| <p>Although relevant plans have been detailed, the relationship between them could be better developed as could be the interpretation of the overall impact on the LDP preferred strategy.</p> <p>See under CE1/CE2</p> | <p>Ensure that contextual strategies have collectively influenced the strategy and ensure evidence is available on all areas of joint working both within the authority and external organisations.</p> <p>Coordinate cross border designations and approaches.</p> |
| C2 It has regard to national policy. | |
| <u>Comments</u> | <u>Suggested Actions</u> |
| <p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p>Reference is made in para 1.5 to the 'no need to repeat national policy' approach in LDPs but this is not highlighted nor effectively carried through in Section 9</p> <p>Population projections and apportionment.</p> | <p>Review, refine or supplement the strategy and deposit plan proposals to reflect national policy where appropriate.</p> <p><i>See also comments under soundness tests CE1 & CE2</i></p> <p>The deposit plan should adopt a form of notation that makes clear when national policy will apply.</p> <p>If a local approach to forecasting varies from nationally based county estimates it will need to be robust and fully justified.</p> |

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| <p>Affordable Target 'Planning Policy Wales' (as amended by Ministerial interim Planning Policy Statement 01/2006 Housing) requires local planning authorities to make appropriate provision for affordable housing (paragraph 9.1.2). Increased provision of affordable housing is a key policy goal for the Assembly Government (as expressed in section 5.1 of 'One Wales – a progressive agenda for the government of Wales', June 2007)</p> <p>Best and Most Versatile Agricultural Land It does not appear that the impact on Best and Most Versatile Agricultural land is to be used as a criterion in selecting allocations from the candidate sites list? Although the location and extent of BMVL in the county is not known in detail it is unlikely to be widespread and probably confined to particularly favourable sites. However the issue of agricultural land quality should be considered particularly if large scale sites are required such as an alternative or contingency strategic employment site.</p> <p>Gypsy and Traveller provision: WAG Circular 30/2007: 'Planning for Gypsy and Traveller Caravan Sites' and Annex B.</p> <p>Minerals: 'Minerals Planning Policy Wales' and MTANs set the framework for LDPs to work within. This includes safeguarding mineral resources, application of buffer zones, prohibition orders and provision of local materials for vernacular buildings.</p> | <p>See CE1/2 below</p> <p>Review criteria.</p> <p>Ensure appropriate site/s are identified in the deposit plan (both permanent and transit) along with a criteria based policy.</p> <p>Ensure relevant minerals safeguarding (sand/gravel, higher quality hard rock i.e. sandstone) buffer zones and dormant sites requirements etc are covered in the deposit plan. It would aid clarity to include information on landbanks in the plan as well as active/dormant stone, sand/gravel, hard rock and metal mines. Permitting small scale mineral operations for vernacular materials may require further investigation. Clarification on serving prohibition orders would be of assistance.</p> |
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| <p>Waste: National Planning Policy Clarification Note (CL-04-04) '<i>Unitary Development Plans – Waste Policies Hazardous Waste Planning Applications</i>' (May 2004) sets out the minimum guidance to future waste management development that the Welsh Assembly Government is likely to find acceptable in development plans. LDPs should reflect the Regional Waste Plan and include an analysis or commentary about how it relates specifically to the current context for waste management and waste planning in the plan area. Plans should identify sufficient sites to provide for a range of facilities in order to meet European Directives.</p> <p>Water supply and waste water infrastructure: Evidence regarding the capacity of waste water infrastructure and water supply is limited and raises questions regarding the deliverability in certain locations, particularly where it is highlighted as such in the Reg.15 document.</p> <p>Floodrisk: Planning Policy Wales' paragraph 13.2.3 and TAN 15: Development and Flood Risk. It is not clear whether flood risk issues have been given a sufficient weight in terms of developing the preferred strategy, or the implications for specific sites.</p> <p>Historic Environment National policy and designations cover much of the historic environment and this does not need to be repeated. However the strategy underplays the significance of the historic environment of Ceredigion as an issue</p> | <p>The deposit plan should make site allocations for waste requirements and include a related 'B2' policy to provide flexibility. This will require expression in terms of land area (hectares) as well as site identification.</p> <p>Existing capacity or the level of improvements required to achieve growth levels, as well as identification of the impacts on delivery will need further clarification. Demonstrating delivery of the strategy will be critical and may imply a phasing programme.</p> <p>Further technical evidence will be required to demonstrate how the issue of flood risk has influenced the development strategy, as well as specific sites. Fluvial and coastal flooding should be factored into the evidence base, as well as mitigation measures.</p> <p>3.17 Page 14 Consider restructuring this paragraph to reflect the range of assets encompassed by the Historic Environment. Consider using a hierarchy to identify the nationally significant features first, for example...</p> |
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and this has a knock-on effect throughout the document. The deposit plan should place greater emphasis on the Historic Environment which can be defined as encompassing all those material remains that our ancestors have created on land and coast. It ranges from historic landscapes, parks and gardens, distinctive field patterns and thoroughfares through to historic settlements, traditional buildings, ancient monuments and buried archaeological sites. It provides a constant reminder of past human enterprise, a source of enjoyment and learning and combines with the natural environment and habitats to give us a unique sense of place. It is a daily inspiration and important asset for the future.

“Ceredigion’s historic and modern built environment plays an important role in creating an attractive and interesting place to live and visit. In terms of Historic Environment, within Ceredigion there are 234 Scheduled Ancient Monuments (nationally protected), 1883 Listed Buildings (mainly Grade II with 10 at Grade I), 13 Conservation Areas, 11 registered parks and gardens, 4 registered landscapes of Outstanding and Special Historic Interest¹ (Upland Ceredigion, Lower Teifi Valley, Drefach-Felindre and Towy Valley) and 3 Heritage Schemes (Aberteifi/Cardigan, Aberystwyth and Llanddewi Brefi). In addition there are many hundreds of regional historic assets including features particular to Ceredigion such as the remains of over 425 abandoned metal mine sites and trial digs”.

¹ Cadw/CCW/ICOMOS Register of Landscapes of Historic Interest in Wales.

Section 4 Summary of Key Issues Page 19 Environment and Climate Change

There is currently no specific reference to the Historic Environment within this important section of the document. KI 9 could be reworded to cover the need to conserve, enhance and promote the historic environment, its archaeological resource, historic buildings and landscapes, parks and gardens.

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| | <p>Section 8 The Preferred Strategy Page 54 Environment and Climate Change</p> <p>It would be appropriate to include a paragraph similar to 8.62 recognising the need to take specific account of the Historic Environment. The paragraph could include reference to Planning Guidance Wales (Chapter 6) “Conserving the Historic Environment” which sets out national development control policy with regard to designated and non-designated historic sites. Reference could also be made to the existence of the register of historic landscapes and associated characterisation studies and detail the LDP approach to protecting the distinctive historic environment of Ceredigion</p> <p>8.64 “....ensure Ceredigion’s natural resources and historic assets are protected”</p> <p>Section 9 Key Strategic Policies Policy 12 Page 61</p> <p>Consider addition of reference to the need to protect buildings of local importance i.e. buildings which are not listed but which contribute to the regional architectural vernacular character and/or wider landscape. For example “Development affecting buildings which make an important contribution to the character and interest of the local area will be permitted where the distinctive appearance, architectural integrity or their settings would not be</p> |
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| | <p>significantly adversely affected”.</p> <p>Policy 18 Page 64 This policy could be developed to offer clearer guidance with regards to the Historic Environment. Consider including additional words “The character and quality of Ceredigion’s landscape and historic environment will be protected, and where possible enhanced”.</p> <p>Reference could be made to relevant policy indicating that:- All proposed developments will be assessed with regard to Planning Policy Wales guidance (Chapter 6 “Conserving the Historic Environment”). Only appropriate development that promotes local distinctiveness and includes recognition of the historic and cultural heritage will be permitted. (Policy 12(3) refers)</p> |
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| C3 It has regard to the Wales Spatial Plan | |
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| Comments | Suggested Actions |
| <p>It is not clear how the proposal to identify all the six main towns (including Aberystwyth) as the Urban Service Centres fits with the Wales Spatial Plan which identifies Aberystwyth as a settlement of national importance, acting as a strategic centre for Central Wales, distinct from the other 5 towns identified as “Key Settlements”. Although, the text confirms that Aberystwyth will have the highest proportion of housing and will be the</p> | <p>Consider evidence underpinning relationships and highlight the significance of Aberystwyth above other settlements.</p> |

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| <p>location for any larger scale employment and retail in the north of the county perhaps the key national role of Aberystwyth should be more clearly identified in the Plan.</p> <p>Additionally it is not entirely clear how the LDP service centre approach relates to the WSP settlement cluster concept.</p> | |
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| C4 - Has regard to the relevant community strategy. | |
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| <p>CE1 The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities & CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</p> | |
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| <u>Comments</u> | <u>Suggested Actions</u> |
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| <p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5).</p> <p>General Some fundamental elements of the LDP strategy tend to be lost within the text of the document.</p> <p>There could be more in the way of a brief justification of the key policies with links to the evidence base and background analysis papers.</p> | <p>Consider the need to:-</p> <ul style="list-style-type: none"> • Draw out more of the key messages in the summary box on page 36. • Summarise the impact of the contextual strategies. • Ensure policies are justified, well related to the preferred spatial strategy and that it is clear how they deliver the spatial strategy. |

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| <p>Vision, Aims and Objectives</p> <p>An LDP vision should be locally distinctive, land-use orientated, place specific and clearly identify actions that will have occurred over the period to ensure issues have been addressed.</p> <p>While the LDP vision has been improved it would still benefit from an even more locally distinct content and a structure that reflects the list of main themes arising from the issues and which is carried forward into the plan objectives etc. It could provide a clearer picture of where the authority wants to be in land-use terms at the end of the Plan period. E.g. how the area will look and function, how it will have changed over the plan period and where the majority of development will take place.</p> <p>Tighter clear SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) will make them easier to monitor and also help ensure the strategy is being delivered. Objective 1 should perhaps be adapted for the Deposit Plan to be more specific about the level of growth anticipated.</p> <p>It is difficult to understand how the final choice of preferred strategy was derived from the options identified or what role the plan objectives have played in selecting the preferred options. Although it is accepted that objectives relevant to the key policies are identified it is not entirely clear how the main spatial strategy achieves the plan's objectives.</p> <p>Evidence- Robust and Credible</p> <p>There appears to be a good range of background papers covering the evidence base needed to inform the strategy. However there may be a need to ensure that:-</p> | <p>Amend/enhance the LDP vision to make it locally distinct and indicative of the desired position in 2022, ensure the LDP objectives are clearly related to the vision.</p> <p>Cross-reference the objectives section to the Table 3 monitoring framework.</p> <p>Demonstrate that the contextual work and LDP objectives have been used to make preferred choices.</p> <p>Ensure appropriate evidence is available and its influence in developing and supporting the strategy is clear.</p> |
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- the viability and delivery of affordable housing provision is demonstrated
- other obligation/S106 requirements can be delivered
- the priority to be placed on S106 requirements in particular locations/circumstances is clear
- the issue of infrastructure constraints and therefore solutions is fully detailed.
- references to the LHMA only identifying 2 Housing Market areas in the county are squared with the diverse set of rural service centres proposed in the strategy.
- how the LHMA has influenced the level of growth and supports the strategy
- an open space assessment has been undertaken before deposit in respect of paragraph 8.58 that states that, *“There is a clear need for further work in relation to determining the appropriate level of access to open space within the County”*.

Coherence (links) and flow

Perhaps only some very key messages arising from the review of other strategies and the portrait of the area need to be flagged up in the deposit plan just to show where the key issues come from and how they flow through the strategy.

Connections between preferred topic approaches are not always made entirely clear and there could be some improvement in links so it is easier to show how they make up a coherent 'strategy'. For example how the separately generated employment and housing scenarios sit together.

Cross Boundary Issues and Neighbours

See other tests

If any fundamental aspects of the Strategy change when the evidence is finalised, the documentation must make clear where such changes occur with a clear audit trail.

Consider and clarify these internal linkages.

The nature of these neighbour links and cross –border consistencies will need to be firmly established for the

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| <p>The strategy indicates the need to reflect on the position in neighbouring authorities.</p> <p>Realistic and Appropriate Comments made under other soundness tests are also relevant here.</p> <p>There are a number of areas where preferred options do not appear realistic/appropriate or there is insufficient justification. The following are examples:-</p> <ul style="list-style-type: none"> ▪ Linking the affordable housing demand to the target – Policy 7, affordable housing suggests a target of 700 affordable units during the lifetime of the plan. Assuming new allocations of about 4300 this equates to an average of 16% affordable units. Whilst Part 7 discusses the issue and indicates a demand of c 140 per annum (or over 2000 across the plan period) the conclusion is a rather unambitious target. The Council will need to be able to defend this by providing the necessary viability studies given the increasing scale of the demand and the importance of the issue. While reference is made to particular local problems e.g. in the tourist towns and 100% affordable sites etc are mooted no clear strategic proposals to meet local differences in affordability/availability are indicated. As the plan notes affordable housing units are likely to be one of the first casualties of the recession so the impact of the phasing of housing consents/development on yield needs to be explored. The implications of meeting/not meeting the output of the LHMA will require clarification. ▪ The rationale for the identification of service centres and for the proportionate distribution between urban and rural service centres and the linked settlements will need to be explained more clearly in the deposit plan. | <p>deposit plan.</p> <p>Reconsider affordable yields/targets and viability testing issues.</p> <p>Explain rationale/improve justification for distribution.</p> |
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The strategic work could be carried further so that the basis for growth distributions between the service centres was clarified and the scale of development in each was apparent so that the implications of the strategy could be appreciated. Without this underpinning there is a danger allocations will be made on the basis of expediency where there are easy opportunities or commitments rather than resulting from the application of a coherent strategy for service centre support.

Key Strategic PoliciesPolicy 4: Rural Service Centres

Reference is made to Capel Bangor. Consideration should be given to the planning history with a clear demonstration of why the site should be included in the deposit plan.

Policy 6: Development in the Open Countryside

Reference is made to the conversion of existing or redundant rural buildings for employment use or as affordable housing. There should perhaps be a reference to “suitable” buildings as not all rural buildings will be suitable for conversion (e.g. modern barns).

Policy 7: Affordable Housing

Part 3 refers to affordable housing for discounted sale and for rent. Is this form of housing intended to meet the definition of affordable housing given in the Housing MIPPS or is it just low cost “market housing”?

Policy 8: Meeting a Range of Housing Needs

The Council need to ensure that the threshold of requiring lifetime homes on developments of 5 or more units is justified.

The deposit LDP will need to develop further the type, scale and location of development required to achieve the strategy. Development scale should be linked to the issues it is seeking to resolve.

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2b enables the conversion of existing buildings to holiday accommodation. Given the concerns about second home ownership in some parts of the County and the general level of need for affordable housing, the Council perhaps needs to consider whether affordable housing should be given priority. (Paragraph 8.54 appears to touch upon this issue earlier).

Policy 15: Energy Sources

Criteria 1 makes reference to delivering the 'target' of 140Mw. This should not be considered a 'target' or a minimum 'target' to meet. Improved technology could achieve a higher value which should not be prejudiced. Refinement of strategic area of search D should be a refinement, not a substantial reduction.

Policy 16: Designing for Climate Change

Part 1 refers to increased efficiency of residential and non-residential development. National policy is currently being formulated which will in time replace a local policy. However, this does not stop local policies going further, if evidence indicates this is practicable.

Part 2 of the policy refers to "*Ensuring development does not contribute to further flood risk*". This should perhaps be more specific in terms of development not being susceptible to flooding and not contributing to flooding elsewhere. (There is a concern that flood risk issues in general are not given a sufficiently high profile in the document, particularly from a strategic point of view).

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| CE 3 There are clear mechanisms for implementation and monitoring | |
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| Comments | Suggested Actions |
| <p>Implementation and Delivery The deliverability of the preferred option has not really been addressed in the preferred Strategy document. When developing the deposit plan more consideration should be given to the broad phasing of housing and employment development etc over the plan period, to timescales for implementation, and to any related SPG.</p> <p>Impacts on the delivery of affordable housing should be fully explored.</p> <p>There is an indication that infrastructure and other constraints are a significant issue but this is not yet been fully explored and as such may prejudice the delivery of the service centre strategy in certain areas and the soundness of the plan.</p> <p>Monitoring Objective 11 A measure to monitor impact on the historic environment could be included. This could relate to development e.g. any development permitted which has an adverse impact on the historic environment or that is in contradiction of Policy 12/18.</p> <p>The target <i>“Reduce EA referrals to WAG regarding inappropriate C1, C2 development”</i> should be more specific if it is to be monitored annually. (i.e. The aim should be zero, so achieving a year on year reduction is perhaps inappropriate).</p> | <p>Particularly important will be ensuring that the key elements can be delivered, and providing the timescales that are proposed for this delivery. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> |

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| CE 4 It is reasonably flexible to enable it to deal with changing circumstances | |
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| Comments | Suggested Actions |
| The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan. | Ensure that the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes.(e.g. reliance on Capel Bangor site – the importance of which might be more clearly acknowledged on the key diagram) |

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