

## Annex

### Anglesey & Gwynedd Local Development Plan Regulation 15: Welsh Government's response (annex to letter June 2013)



Llywodraeth Cymru  
Welsh Government

<b>P1 - Prepared in accordance with the Delivery Agreement including the CIS</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
The plan should be prepared in accordance with the Delivery Agreement and Community Involvement Scheme.	Amend the timetable to reflect the unforeseen timing of Ynys Mon elections.
<b>P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<b>SA/SEA and Habitats Appropriate Assessment - Habitats Regulations Appraisal (HRA):</b> We note that the Preferred Strategy has been subject to an interim SA/SEA and subject to HRA screening.  It is now more appropriate to reference NRW (Natural Resources Wales) rather than CCW or EA.	N/A The impact these assessments have in refining the strategy and developing the deposit plan as part of an on-going, iterative process should be clearly articulated.

<b>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.</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<p>The background documents supporting the preferred strategy provide the national, regional and local context for the LDP and refer to a number of the key <b>relevant plans, policies and strategies</b>. These are summarised to bring out the key implications for the plan and generally show how they have influenced the strategy.</p> <p>It is made clear that apart from the National Park the plans of <b>neighbouring authorities</b> will generally have little impact on Gwynedd/Mon but where there are implications these have been reflected in the preferred strategy.</p>	<p>Ensure evidence continues to be provided on areas of joint working identified both within the authority and with external organisations. It is important the authority continues to engage in documented collaborative working and obtains agreement: for example on housing, infrastructure; utilities, employment and retailing.</p> <p>As more detailed proposals are further developed, especially in respect of settlements near boundaries where the proposals could have cross border implications, collaborative working should continue to ensure a robust evidence base and consistency.</p>

<b>C2 It has regard to national policy.</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<p>LDP Wales and PPW make it clear that although LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. It should be made clear where national policy will apply/suffice and where more local interpretation/application is intended. The Figures at the end of each chapter of PPW provide a guide to the application of national policy to LDPs which should inform the deposit plan.</p> <p><i>N.B. Further comments in relation to national policy are also included under soundness tests CE1 &amp; CE2</i></p> <p>The following are some examples of where there is a particular need to have regard to national policy</p>	<p>Review, refine or supplement the strategy and deposit plan proposals to reflect national policy where appropriate.</p> <p>The deposit plan should adopt a form of notation that makes clear when national policy will apply.</p>

but the list is not intended to be comprehensive.

**Population/household projections:** See **objection** and comments below in respect of growth options.

**Affordable housing target** 'Planning Policy Wales' 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 Welsh Government. Where there is identified need the plan should seek to maximise provision commensurate with viability.

It is noted that a new affordable needs exercise is being undertaken for Ynys Mon, a similarly up-to-date assessment should be available for Gwynedd to support the proposals.

**Gypsy and Traveller provision:** The requirements of WG Circular 30/2007: 'Planning for Gypsy and Traveller Caravan Sites' and Annex B should be followed.

The draft GTAA covering most of North Wales indicates there is a need for residential and transit site/s in the plan area.

**Minerals:** 'Minerals Planning Policy Wales' and MTANs set the framework for LDPs to work within. This includes safeguarding mineral resources, areas for working to provide for needs or where working would be inappropriate, application of buffer zones, prohibition orders and provision of local materials for vernacular buildings. Minerals safeguarding will need to be included in the plan based on BGS Mineral Resource Maps and Aggregate Safeguarding Maps. (CPO letter 14.10. 12) These maps do not

Ensure that the refined strategy and deposit plan **reflects the 2011 based WG projections** or that any deviation is capable of robust justification with reference to more up-to-date local evidence.  
Ensure that the LHMA is up-to-date.

Include an indication of the overall need for affordable housing and a target figure in the plan. Policies should seek to maximise delivery but must be backed by robust evidence of need and viability which is kept up-to-date.

**The deposit plan must make appropriate site allocations (both permanent and transit) to meet the requirements** and include criteria based policy to cater for any further unforeseen needs. The GTAA should be finalised and any changes since 2010 should be included in the evidence base. Collaboration with Welsh Government Fairer Futures Division will assist in ensuring the content, method and response adopted is appropriate and can be supported at examination.

The deposit plan should:

- safeguard mineral resources in line with national policy and maintain consistency across boundaries with neighbouring LPAs;

form part of national policy but are signposted as a consistent and readily available set of information for safeguarding in LDPs. In areas where coal reserves are present the provisions of MTAN 2 will need to be considered. CPO letter 15.5.13 provides advice on the review of Regional Technical Statements.

**Waste:** National Planning Policy Clarification Note (CL – 01-12) sets out the interim position pending a review of PPW and TAN 21. Regard should be had to emerging policy but this should not delay the plan. Land take ranges, locational criteria and areas of search from the RWP should continue to be used to facilitate the provision of a diverse waste infrastructure. Plans should identify sufficient sites to provide for a range of facilities in order to meet European Directives.

**Water supply and waste water infrastructure:** Plans/plan allocations must be deliverable. Evidence regarding the capacity of waste water infrastructure and water supply is limited so far and could raise questions regarding the deliverability of sites in certain locations. It is noted that a further topic paper is to be prepared.

**Flood risk:** Flood risk issues are referred to and a SFRA has been prepared. however in detailing the preferred strategy and allocating specific sites it is vital that avoiding floodrisk in accordance with PPW paragraphs 13.2/3 and TAN 15: Development and Flood Risk is given sufficient weight.

- adequately provide for the contribution to aggregates production over the plan period identified in the RTS;
- be as clear as possible as to areas where coal should not be worked;
- include Buffer Zone and dormant site requirements;
- provide clarification on serving prohibition orders;
- be supported by robust background evidence.
- ensure clear evidence is provided on how mineral supply and safeguarding has affected the development of the preferred strategy and proposals.

The deposit plan should be supported by evidence and make appropriate site allocations for local/regional waste requirements and include a related 'B2' employment policy to provide flexibility. This will require expression in terms of land area (hectares) as well as site identification.

Ensure capacity is available or that it can be delivered in areas selected for development.

Provide clear evidence of how flood risk has been fully reflected in the further development of the preferred

<p><b>Climate change:</b> The impacts of climate change and the adaptation responses with regard to; floodplain/water management, biodiversity, green/open spaces and the historic environment in the location and design of new developments should be understood and reflected in proposals.</p> <p><b>Renewable energy:</b> It is noted that a Renewable Energy Assessment has been undertaken in line with PPW, Tan 8, the Renewable Energy Toolkit and related clarification letters. The findings should be reflected in the deposit plan..</p> <p><b>Agricultural land:</b> The requirements of PPW (4.10.1) in respect of preserving the best and most versatile agricultural land (BMVL) should be part of the strategy refinement and site selection. Although this does not appear to be a candidate site selection criterion it is understood that steps have been taken to obtain relevant information to inform the evidence base. Draft LDP Policy PS14(7) does seek to minimise the loss of best and most versatile agricultural land.</p> <p><b>Historic Environment:</b> Heritage is explicitly recognised in the vision/objectives and the preferred strategy recognises the importance of and need to protect the cultural and historic environment of the region. However successful implementation will be dependent upon the more detailed work to ensure that when providing for growth negative impacts on the historic environment are avoided.</p>	<p>strategy and in site selection in accordance with PPW, TAN 15 and CPO letter 12.3.13 (DA Maps).</p> <p>Evidence how climate change (including flood risk) has been taken into account and affected the further development of the preferred strategy.</p> <p>Ensure renewable energy resources are promoted through the development of detailed policies.</p> <p>BMVL is likely to be an issue in some locations and in line with PPW should be given due consideration when finalising site allocations.</p> <p>An active dialogue with CADW should be maintained as the plan is developed.</p>
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<b>C3 It has regard to the Wales Spatial Plan</b>	
<b><u>Comments</u></b>	<b><u>Suggested Actions</u></b>
<p>The preferred strategy and supporting documents make reference to the WSP. The key settlements and basic strategy adopted in the WSP are reflected in the preferred strategy.</p>	<p>The regional significance of Bangor/ Menai hub, the strategic port function of Holyhead and the national importance of major energy infrastructure projects should be reflected in the deposit plan details.</p>

<b>C4 - Has regard to the relevant community strategy/ies.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
There are clear references to the current 'Integrated Plans' of both authorities. The supporting documents note that a joint 'Integrated Plan' is being prepared.	Work on the details of the deposit plan should be coordinated with the joint 'Integrated Plan' exercise and recorded to help show how the plan responds.

<b>CE1 The plan sets out 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 &amp; 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</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p><b>Document structure and presentation</b></p> <p><i>The Preferred Strategy documentation should make clear what the <b>key issues</b> are that the LDP will address, what the plan <b>vision</b> is, what the plan <b>objectives</b> are, what <b>strategic spatial options</b> were considered and what the <b>preferred spatial strategy</b> is (see LDP Manual section 6.5).</i></p> <p><b>General</b></p> <p>As yet the documentation does not quite bring together the preferred strategy elements into a comprehensive focused text for the first part of the LDP. This will require careful drafting for the deposit plan to provide the succinct justifications and linkages that will demonstrate how the strategy is appropriate, holistic, coherent and deliverable</p> <p>Although strategic policies are referenced to the objectives and other plans there could be some cross references to the evidence base/analysis in the background topic papers.</p> <p><b>Coherence (links) and flow:</b> To keep the LDP focused a distilled version of the key land use planning messages arising from the review of other strategies, stakeholder engagement, etc will be needed in the deposit plan to signal the origin of the key land use issues and how they flow through the strategy.</p> <p><b>Connections</b> between topics while mentioned are not always made entirely clear and there could be some improvement in links so it is easier to understand how they make up a coherent strategy.</p>	<p>Bring together the preferred strategy elements into a comprehensive text providing succinct justifications and linkages.</p> <p>To keep the deposit plan concise use summaries cross referenced to more detailed analysis and justification in specific parts of the background topic papers.</p> <p>Present the strategy and plan details more holistically.</p>

<p><b>Realistic and Appropriate:</b> There are a number of areas where the options/preferred options do not appear realistic/appropriate or there is insufficient justification. The following are examples:-</p> <ul style="list-style-type: none"> <li>•the preferred hybrid housing growth option - see below</li> <li>•the proposed distribution within the settlement hierarchy – see below</li> <li>•the lower tier of the settlement hierarchy – see below</li> </ul> <p><b>Sufficient Detail/Implications:</b> To understand the implications of the strategy further strategic work will be required so that the basis for growth distributions between the tiers in the hierarchy and specific settlements within each tier is clear and the scale of development in each is apparent. The extent to which the eventual distribution is the result of the application of a coherent strategy for supporting service centres at various levels and/or is a response to appropriate opportunities or commitments will need to be explained.</p> <p>The pattern of zones of influence or dependency and the extent to which they are used where there are constraints to determine distribution including the diversion to linked or satellite settlements should be transparent and based on sound evidence.</p>	<p>Review and refine the strategy accordingly.</p> <p>Review rationale.</p> <p>Present relevant evidence, details and justification in a clear and transparent manner.</p>
<p><b>Evidence Base: Robust and Credible:</b></p> <p>While evidence should be available to inform choices at the outset and not to justify them afterwards provision should be made to regularly refresh key evidence (e.g. viability) and the strategy and policies should be flexible enough to respond.</p> <p>Background documents and assessments have been prepared but some evidence is still emerging and some will evolve as it is updated during plan preparation. The implications of this for the further detailing of the strategy and the deposit plan content will need to be reviewed and it should be made clear when and where changes occur.</p> <p>It will be important to ensure that:-</p> <ul style="list-style-type: none"> <li>• the population/housing growth adopted reflects the latest Welsh Government principal projection and is based on robust statistical analysis and data which can accommodate updates during plan preparation, or if policy based there are very strong reasons for this which can be fully justified at examination.</li> <li>• the LHMA is up-to-date and along with the further work being undertaken for Ynys Mon influences the level of growth and supports the strategy – particularly the implications on the respective needs for market and affordable housing on land requirements.</li> <li>• the delivery of affordable housing provision can be demonstrated and optimised as the various</li> </ul>	<p>Ensure the evidence base is kept up-to-date and all proposals are evidence based.</p> <p>Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic site take up and other changes.</p> <p>Ensure that the background documents contain more than facts and figures, these should include analysis/explanation/ justification of how the authority has reached its deposit proposals which can be cross-referenced to short summaries in the deposit plan text.</p>

<p>factors affecting viability evolve over time.</p> <ul style="list-style-type: none"> <li>• any other physical and social infrastructure required via conditions, S106 obligations or CIL reflects viability and can be delivered.</li> <li>• the priority to be placed on S106 requirements in particular locations/circumstances is clear and reflects restrictions in the CIL Regulations.</li> <li>• infrastructure constraints and the proposed solutions are fully detailed.</li> <li>• the retail study remains up-to- date .</li> <li>• employment, open space and other assessments meet current and emerging guidance.</li> </ul> <p><b>Supplementary Planning Guidance</b> should not contain policy but where the plan relies on such guidance to indicate how policies will be applied in practice it should be made available at the same time as the plan or shortly afterwards in line with a timetable.</p>	<p>Information on the SPG programme should be provided when the plan goes on deposit, including timescales for its preparation. SPG adopted under the UDP should be reviewed or updated to ensure that it is in line with the preferred strategy of the LDP.</p>
<p><b>Vision and Objectives.</b>  <i>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</i></p> <p>The vision could be reordered so that the bullets reflect the structure adopted for the issues, outcomes, objectives and strategy to demonstrate linkages.</p> <p>The vision itself is not locally distinct but it is noted that the ‘outcomes’ section of the preferred strategy document provides a useful indication of what the vision will mean in practice. This might be further refined to provide a brief but clear picture of where the authority wants to be in land use planning terms, the changes envisaged on the ground, the form and function places will take, how communities will look by the end of the plan period and where the majority of development will take place.</p> <p>There is some potential for confusion in terms of how the ‘outcomes’ relate to the issues and the way they overlap with the objectives.</p> <p>Without a clear link between objectives and outcomes it is difficult to understand what role the plan objectives have played in selecting the preferred option/s and it is not made entirely clear how the preferred strategy achieves the objectives although the way that they relate to the strategic policies is identified.</p> <p>Except for S 23 the objectives are also non-specific in terms of location and could have been more spatially focused to help deliver the vision. In some cases they could be better framed as SMART</p>	<p>Consider reordering the vision to make it clearer how it relates to the issues, objectives, outcomes and strategy.</p> <p>Clarify how the ‘outcomes’ relate to the issues and objectives and consider whether it is possible to rationalise these sections in the deposit plan.</p> <p>Refine/rationalise the objectives in the light of the outcomes.</p> <p>An over arching environmental improvement objective could be considered.</p>



Very small 'clusters', which in the main appear to lack services, are not sustainable places to locate residential development. Only in very sparsely populated, deep-rural areas where there are no larger settlements would they be an appropriate location. Where they are close to larger villages or towns then these more sustainable places should be the preferred choice for new development. In most parts of the plan area it would appear that geographic spread and the needs of rural areas could be met in settlements that have some services. The particular housing need in the clusters that could not be met in more sustainable settlement close-by is not evidenced nor is the language impact and the way policy at this level would work in practice. The lowest tier of the hierarchy should be restricted to the small village scale where there are at least some services available. Even here the amount of development, both individually and overall, should not be significant and should be strictly controlled to meet only the specific local need for affordable dwellings. Development elsewhere should be treated as open countryside where only rural enterprise dwellings in line with national policy would be appropriate.

The way in which applications in these locations will be determined and the number of consents controlled is unclear. Provision for affordable housing should accord with PPW and TAN 2 definitions.

It should be made clear how the availability of infrastructure (surplus capacity/programmed provision), the rural schools strategy, any significant overriding constraints (e.g. flood risk) and the current distribution of commitments have influenced the options for, and choice of the, preferred spatial strategy and its further detailing.

**Reconsider the 'cluster' level designations** and reconsider the proportion of development proposed for small villages.

**We would welcome further explanation and discussion regarding the proposed lower tier settlements, the amount and type of development intended and the detailed policies to be used to control development.**

Distribution/control mechanisms need to be clear and workable in practice.

To ensure the strategy and deposit plan is robustly evidenced and can deliver at each tier a detailed review of all the identified settlements will be necessary to establish the capacity for development and level of growth that can be accommodated, based on role, function and constraints.

### **Growth Options**

At least in the early stages of plan making it can be better to express growth options as a range to provide the flexibility to respond to up-dated evidence and revised forecasts, etc. which may occur before submission.

The plan and supporting documents set out the options for elements of growth in a rather fragmented way but the strategy included in the deposit plan will need to be holistic and ensure that constituent elements are properly inter-related. In particular the interaction between employment (all types) and housing provision will need to be better explained.

Ensure clear evidence is available to explain how growth level predictions have influenced the selection of the preferred strategy.

The deposit plan and its evidence base should clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas

### Housing Growth:

Reference is made to PPW paragraphs 9.2.2 and 9.2.1.

The hybrid preferred option, equates to the WG 2008 lower variant household projection. This represents substantially fewer dwellings (c1,900 dwellings or 20%) over the plan period relative to the principal projection. It is accepted in the topic papers that new national projections based on the 2011 census will become available later this year and will have to be addressed and reflected in the plan. For the present the Welsh Government objects as it considers that there is insufficient evidence to justify using the 2008 lower variant and the assessment/conclusions appear weak.

The plan needs to provide enough headroom in the adopted growth scenario to be able to respond to upturns in the market/economic situation and to what the industry could deliver in the future to meet both general and affordable housing needs.

It is noted that the respective Council Business Plans highlight housing/affordable housing as key matters while the approach taken in these documents is to 'plan for success'. The employment land requirements adopted for the preferred strategy imply excess provision justified on the basis of providing for churn and economic revival. To be consistent the provision for housing should complement this approach.

It is not clear whether the proposed level of growth sufficiently addresses the Wylfa requirements or the need for, and provision of, affordable housing as highlighted in the key issues.

Consistency and clarity is required in the terminology used in the document. It is not made clear on what basis the household projections have been converted to dwelling requirements and the degree to which they provide for contingency.

Developing from the Urban Capacity exercise a broad estimate of the likely delivery of windfall housing will be required and, where appropriate and fully justified, this should be incorporated as part of the housing provision in the deposit plan. While it is appreciated that the majority of development in the plan area tends to take place on small sites below allocation thresholds it is important that the degree of reliance placed on windfalls should not be excessive and be well within what can be shown to be reasonable over the plan period. Unreasonable dependency on windfall delivery will not provide the certainty needed.

A 'residual' approach should be taken to assessing the extent to which it is appropriate to carry over and rely on commitments, completions and allocations from the UDP.

The deposit LDP should:

- **provide robust housing figures** which are adequately evidenced in accordance with national policy; where a plan deviates from the latest WG projections it is the responsibility of the LPA to justify the deviation, as set out in PPW
- include a robust affordable housing target;
- provide threshold(s) to deliver affordable housing and clarify the reasons for them with suitable viability studies;
- evidence collaborative working with neighbouring LPAs where appropriate in identifying housing requirements;
- clarify the inter-relationship between housing/ employment/ retail land allocations within the plan area and with neighbouring plan areas;
- clarify the households/dwellings ratios adopted
- explain clearly how provision for windfall sites, rural exceptions site policy and any allocation of sites for 100% affordable housing is accommodated.

<p>Developing and maintaining an up-to-date spreadsheet/table on a settlement by settlement/categories of housing delivery basis will assist in evidencing adequate provision.</p> <p><b>Employment growth:</b>  Employment/economic based growth strategies can be appropriate and it is noted that this is option has been considered. To be most useful the projection should be unconstrained and it is not clear why it excludes a demographic element.  The reasons underlying the proposed over allocation of employment sites are accepted but to be consistent similar reasoning should apply to housing provision.  It is noted that for most of the plan area sufficient employment land is already identified. Past over allocations, poorly located sites or ones which have never been progressed to any degree should be rationalised in the light of a rigorous review which should also explore the appropriateness of other uses. Linking the good quality sites to the main settlement hierarchy and housing provision is vital to meet the national 'need to travel' objective.  Proposals and policy should reflect recent revisions to PPW and the emerging Economic Development TAN should be given appropriate consideration.</p> <p><b>Retail Growth:</b>  The assessment of future retail demand needs to be coordinated with the levels and distribution of population/housing growth indicated by the preferred strategy.  The retail hierarchy proposed should be related to the settlement hierarchy and the existing pattern of retail centres and supermarket provision should be considered in terms of zones of influence and need to travel.  The long term impact of inter-net retailing should be appropriately reflected in the estimate of needs going forward</p>	<p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> <li>- ensure the level of provision and distribution proposed can be fully justified</li> <li>- identify any strategic employment sites;</li> <li>- be robust and realistic in terms of employment land allocations and their deliverability;</li> </ul> <p>Reflect the current lack of need, likely changes to retailing and the current distribution in the strategy/policies.</p>
<p><b>Strategic Policies</b>  <i>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).</i></p> <ol style="list-style-type: none"> <li>1. Comments at section C2 and above in CE 1&amp;2 above are relevant.</li> <li>2. Further consideration should be given to the parts of these strategic policies which would be better included with the text explanation of the strategy. The strategic policy/ies could be in the main be limited to just making it clear that only development in accordance with the strategy will be approved. Requirements and criteria could be merged with more detailed policies in the deposit plan to avoid repetition/confusion.</li> <li>3. There is considerable overlap with national policy without an additional local dimension. The plan should avoid repetition and indicate when and where it relies on national policy. The</li> </ol>	<p>Clarify where national policy will apply.</p> <p>Redraft strategic policies for greater relevance and local focus; add necessary detail.</p> <p>Ensure the policies provide clear requirements for decision making to ensure the spatial strategy will be delivered.</p>

Figures at the end of each chapter of PPW provide a guide to the application of national policy to LDPs which should inform what maybe appropriate in the deposit plan.

4. Further consideration will need to be given to refining the wording and expressing the policies in land use terms so that they can be used to manage/control development. Policies should not contain administrative action which should be in the text if appropriate. Requirements should be clear and set out as criteria for determining applications.

NB comments 2, 3 and 4 relate to most policies.

5. PS 1: Sustainable Development for the most part repeats national policy but if made more locally distinct and retained it should reflect the national presumption in favour of sustainable development. Objective 2 should focus development within settlements not elsewhere.
6. PS 2: Climate Change overlaps with PS1 and could be merged.
7. PS 3: Settlement Strategy on the one hand includes elements that would be better in text describing/outlining the strategy and on the other omits reference to how decisions will be made and the proportions/amounts of development to be allowed. Detail could be in a table form cross referenced to the policy. There could be more reference to the relationship with other uses. There is no reference to settlement boundaries, the role of the various types of village is not reflected in policy requirements. Development should not be allowed in clusters at all but extension plots in addition to infilling would certainly not be appropriate. The process for deciding on the complementary distribution pattern vi) needs to be transparent and details need to be set out so the implications are clear for decision making.
8. PS4: Open countryside. Much is national policy but the criteria do not seem to cover agricultural dwellings? Reference maybe needed to other policies such as the AONB and bio-diversity which could impact on consent.
9. PS 5: Developer Contributions. This might be better seen as a means to achieve sustainable development and could be merged with other policies. Part is administrative action not policy. Although CIL is mentioned it needs to be clearer how policy will work within the Regulations. The wish list could raise unreasonable expectations. Viability and priorities need to be considered.
10. PS 6: Major Infrastructure could be merged with PS7: Nuclear where similar issues apply. Policy should relate to the decision making requirements for associated development and the approach to responding to consultation might be more appropriate as text. PS7 does not really tackle the siting of legacy housing. Links to existing or proposed SPG could be appropriate.
11. PS 8: Economy. Again needs rephrasing and refining as policy and decision making criteria. Parts are administrative actions, others need to identify land-use implications. Reference should be made to the proposals maps and whether criteria relate to allocations or additional windfall proposals.

Provide greater explanation of the key transport / infrastructure required to deliver the Strategy and if this is the necessary the various funding/planning obligation mechanisms to be employed.

Other potential actions are included with the comments.

<p>12. PS 10: Retail. This needs to cover the local implications of national policy by identifying the local retail hierarchy, designating retail centres (where need is not a consideration), making clear cross referencing to decisions being based on the needs table (also referencing any corresponding allocations).</p> <p>13. PS 11: Balance of Housing. This is expressed as strategy not policy. It is not clear whether a contingency is included. There should be a link to a comprehensive table of location and provision.</p> <p>14. PS 12: Affordable. Again more strategy than policy. There needs to be some room for negotiation to reflect site specific viability and a modest degree of aspiration or mechanism for uplift should markets improve. The policy should clearly set out specific percentages for specific locations if this is intended. Given the need for affordable housing it is not clear why the limit is 5 in urban areas? The viability implication of providing social rented dwellings needs to be considered.</p> <p>15. PS 13: Gypsy and Traveller Needs. The policy should specify the need and must identify sites. Collaborative work, while supported, should not be an excuse for not making appropriate site allocations.</p> <p>16. PS 14: Natural Environment. Special landscape areas will need to be justified. Policy should distinguish 'international' bio-diversity sites where different, more stringent, criteria must apply.</p> <p>17. PS 14/15/16. Framed as administrative action not decision making policy. PS 15 makes reference to the candidate World Heritage Site of the North Wales Slate Industry. This is an important step towards the nomination process which should be followed through in the deposit plan by the inclusion of appropriate policy and reference to further administrative action.</p> <p>18. PS 17: Waste. Ensure policy reflects latest WG advice.</p> <p>19. PS 18: Minerals. Ensure policy reflects the latest safeguarding maps, MTAN 2 Coal and other guidance. Restoration should to a good standard not just adequate.</p> <p>20. PS 19: Welsh language. The implications for the language should be an inherent part of developing the strategy and allocations including any windfall development relied on to deliver the strategy. Further assessment should not be needed except possibly to determine appropriate mitigation or in the case of totally unforeseen development. It should not impede delivery of the plan.</p> <p>21. PS 29: Community Infrastructure. Overlaps with PS 5/12 and also PS6/7.</p> <p>We would welcome the opportunity to assist with the refinement and development of policy for the plan.</p>	
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<b>CE 3 There are clear mechanisms for implementation and monitoring</b>	
<b>Comments</b>	<b>Suggested Actions</b>

<p><b>Implementation and Delivery</b>  Delivery including timescales is extremely important. Deliverability has not really been addressed in the Preferred Strategy. When developing the deposit plan more consideration should be given to this matter, with clarification of the infrastructure that is critical, how it will be delivered, including timescales for implementation. There is an indication flood risk and other key issues will need to be considered, however these have yet to be fully explored. As such they may prejudice the delivery of the settlement hierarchy/ strategy in certain areas. Impacts on the delivery of affordable housing should also be fully explored. CIL intentions and/or Section 106 priorities should be made clear.</p> <p><b>Monitoring</b>  A monitoring framework has not been included as part of the PS. A monitoring framework should consider the key indicators as noted in the CPO letter 28.3.13 Strategic Monitoring Framework and the LDP Manual along with other local indicators and should establish targets (with directions of travel and milestones/phasing). Links need to be made to the issues/objectives/outcomes and the policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, etc. Contingencies and triggers for review should also be considered.</p>	<p>Funding streams, key delivery agents, and infrastructure requirements will need to be identified. It is noted that an Infrastructure Study is underway and an Infrastructure Delivery Plan is proposed. It is essential that this informs the refinement of the strategy and the deposit details.</p> <p>This work may suggest natural phasing over the plan period, although a policy approach may also assist.</p> <p>A monitoring framework should include key targets/ranges, triggers and links to strategic objectives. Indicators should be locally distinctive and linked to the key issues/objectives/outcomes.</p>
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<b>CE 4 It is reasonably flexible to enable it to deal with changing circumstances</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p>The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as more up-to-date projections or a key site not coming forward for development), identify contingencies and what would trigger a review of the Plan. At present it is difficult to assess whether there is sufficient flexibility given that key elements of the strategy and strategic sites have not been articulated.</p> <p>A robust contingency rate should be applied to the proposed housing provision so that there is a sufficient degree of flexibility which can be justified in the local circumstances.</p>	<p>Ensure the refined strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p> <p>Make it clear that the proposed provision figures include a contingency allowance and the</p>

<p>A list of prioritised reserve development sites that could support the refined preferred strategy would assist if, at a later date, alternatives or additions to the proposed allocations are found to be necessary to make the plan sound.</p>	<p>rationale for the rate adopted.</p> <p>Draw up the candidate sites assessment on a priority basis.</p>
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NB The Preferred Strategy Document does not make the plan period clear, it is not included on the cover and the introduction refers to 2011- 2016 not 2026.