

Adran Tai ac Adfywio
Department for Housing and Regeneration



Llywodraeth Cymru
Welsh Government

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Our Ref: qA1006649
Your Ref: 6/CDLL/

27 June 2013

Dear Nia

Anglesey and Gwynedd Joint Local Development Plan (2011-2026)
Preferred Strategy Regulation 15 Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding the Anglesey and Gwynedd Joint Local Development Plan pre-deposit documents. We are pleased to see progress being made in furthering a joint development plan for the area and we acknowledge the amount of work undertaken by the two Local Planning Authorities and the Joint Planning Policy Unit to reach this stage, including the collaborative working which we commend.

Under the LDP system responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms, and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination.

It is for the statutory consultation bodies and their equivalents to contribute to Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment exercises and your task group to help you assess if they are fit for purpose. We recommend you obtain legal advice to ensure that you have met all the procedural requirements, including screening for SEA as responsibility for these matters rests with your Council.

Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Welsh Government is committed to helping local planning authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of plan preparation, and particularly at the Regulation 15 pre-deposit consultation stage. To do this, the Welsh Government looks for clear evidence that the ten tests of soundness (as set out in 'LDP Wales' and the 'LDP Manual', and explained further in guidance issued by the Planning Inspectorate) are being addressed.

(Please note that there will be a need to obtain and consider advice and representations from other relevant Government Divisions regarding candidate site proposals or aspects of detailed site assessment.)

To ensure your authority secures a sound plan in due course, we have carried out a strategic assessment of the Preferred Strategy document (as supported by the other pre-deposit documentation you have published).

We have indicated where evidence of soundness is not immediately clear. The annex to this letter sets out the detailed comments of the Welsh Government.

There still remain some substantive matters as outlined below, which need to be addressed well before you produce a deposit plan. We suggest that to support your on-going self-assessment regarding soundness, you ensure that:

- further development of the preferred strategy and the detailed proposals/policies included in the deposit plan reflect the **evidence** and **national policy** (such as affordable housing, Gypsy and Traveller sites, floodrisk, climate change, infrastructure availability, environmental/landscape issues, waste, minerals, agricultural land, etc) and that this can be demonstrated.
- any deviation from the Welsh Government's latest population and household projections can be justified with reference to robust evidence including an alternative statistical projection using more up-to-date information. **We object to the level of housing provision** proposed and the limited current justification for use of the lower variant 2008 projection unless this is confirmed by the 2011 based principal projection. A low level of provision for housing will have implications for meeting needs, delivering on the issues/objectives and the ability of the plan to respond to changing circumstances. Such an approach will not maximise the provision of **affordable housing** especially given the relatively low viability and the need for other essential community infrastructure requirements/CIL.
- the LHMA and the affordable housing needs assessment is up-to-date and both the level of **affordable housing need and a target** figure are specified in the deposit plan.
- the provisions made for growth incorporate a robust and consistent **contingency** margin to provide flexibility.
- the distribution of development between the types of settlement identified and between specific settlements is clear in respect of their functions, constraints, opportunities and needs at the settlement level. As advised by PPW the direction of travel, whether this at the regional or local scale, should **focus development in the most sustainable locations** where there is access to a range of services.
- the deposit plan avoids encouraging scattered residential development in inappropriate locations. **We object to the identification of small 'clusters'** that do not have the facilities or scale necessary to constitute a small village and which lack justification without clear evidence of specific localised needs that cannot be met in a nearby higher order settlement. The potential amount of development intended for

villages and clusters appears excessive and should be clarified along with the type of controls envisaged. A lack of effective control over the long term could result in negative impacts on the Welsh language rather than the positive benefits anticipated. It will be important to be able to demonstrate how the language would be better supported by promoting more residential development in very small 'clusters' as opposed to rural service centres nearby.

- there is a holistic approach to **housing and employment growth requirements** and a spatial response that ensures employment commitments and housing allocations are aligned in detailed deposit proposals building on a sustainable spatial strategy/settlement hierarchy.
- the special short term requirements and legacy potential of **Wylfa 2** are accommodated
- the implications of significant **constraints** (e.g. flood risk), the availability of infrastructure (surplus capacity/programmed provision), schools programmes and overall viability/market interest, etc inform the detailed strategy and distribution of allocations in a transparent manner.
- **infrastructure** necessary to support development is integral to the plan and articulated accordingly. This should, in broad terms, have regard to the scale, location, timing and funding of infrastructure to demonstrate sufficient certainty of delivery over the plan period.
- **delivery mechanisms, broad phasing** (e.g. relating to infrastructure) and **timescales** for release and implementation can be demonstrated.
- the presentation of the strategy in the deposit plan is clear, focused and **flexible** enough to respond to changing circumstances/ emerging evidence and expressed in a way that could be rolled forward in future if appropriate.
- the deposit plan includes strong, concise, well-worded strategic and other **land-use policies** that do not repeat national policy are locally/spatially distinct and provide a clear basis for planning decisions. Guidance is included in LDP Wales and the Manual on policy wording
- only the key **land-use issues** are summarised in the deposit plan.
- the **objectives** are linked with the **outcomes** to make it clear how the objectives have been used and how they are addressed by the strategy.
- the **objectives/outcomes** are further refined to assist monitoring
- an effective **monitoring framework is** developed.

Clearly it will be essential to continue to develop the required robust evidence base to support the deposit LDP and evidence deliverability.

You should document your response to our comments in your Consultation Report.

It is vital that you maintain momentum and progress to deposit expeditiously in accordance with an agreed Delivery Agreement timetable. Continued progress to achieve an adopted plan to steer and influence development over the next 15 years will assist your authorities in maximising the opportunities and benefits to the community as a whole.

To assist your authorities in taking forward the LDP, we will continue to meet regularly with you and your colleagues over the coming months, including to discuss our response. If you have any queries in relation to the response, please contact Bob Newton (on 0300 062 5427) or myself.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Newey', with a long horizontal stroke extending to the right.

Mark Newey
Head of Plans Branch
Planning Division

enclosure – Annex