



Further Evidence Paper – Alternative Sites

April 2018

Potential Alternative Sites - Evidence Paper

1. Context

- 1.1 Following on from the Inspectors letter dated 21st February 2018 the Authority has taken the opportunity to further explore any potential alternatives sites.
- 1.2 There are many factors that need to be taken into account when considering new housing developments within the National Park. While considering any reasonable alternative sites it is important to protect designated landscape from inappropriate housing development. Other factors that should be taken into account include the latest government household projections, Local Housing Market Assessments, key issues which the plan is seeking to achieve, social issues such as Welsh language considerations as well as considering what can be practically delivered on the ground.
- 1.3 **Within the National Park it is important to remember the National Park purposes and these are**
 1. **Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park;**
 2. **Promoting opportunities for the understanding and enjoyment of the special qualities of (the) areas by the public.**
- 1.4 The national 2014 based population and household projections for the National Park were published in 2017. These projections estimate that between 2014 and 2029 the population of the Park will decrease by 6% which is a total of 1730. During the same period the households in Snowdonia is projected to decrease by 240 (2%). A falling population and slower new household formation rates will reduce the need for more houses. It is estimated that the number of households is projected to stay the same until 2019 followed by a gradual decrease. After 2020 the annual dwelling requirement will decrease year on year from existing levels. Although these projections show a decrease in the number of households in Snowdonia and therefore a likely decrease in the number of dwellings required in Snowdonia it is important that the Eryri LDP continues to aim to achieve accessible and affordable housing to secure the long term viability of Snowdonia National Park's rural communities and to maximise what can be delivered within a National Park context. The Authority considers that the proposed housing requirement of 770 dwellings and a total housing provision of 810 dwellings over the Plan period is reasonable and deliverable within the National Park context.
- 1.5 In addition to the National Park purposes and the housing requirements it is also important to recognise the constraints to development that are present in some of the settlements across the National Park. These constraints include both environmental constraints and also the availability of suitable and deliverable development land.
- 1.6 Any potential alternative sites will need to accord with the Spatial Development Strategy and settlement hierarchy.

2. Local Service Settlement:

- 2.1 Bala: Land for a mix of both open market and affordable local needs as well as a 100% affordable housing site has been allocated in Bala. Current housing developments are being developed at a slow rate indicating a low demand for further

market housing in the Bala. The Authority does not consider the need to allocate additional land in Bala.

- 2.2 Dolgellau is restricted by flood risk issues, environmental designations and topography (visible hillsides). Dolgellau has one site allocated for affordable housing at Wenallt Uchaf to the south of the settlement. The settlement has a number of extant planning permission for 59 open market dwellings on sites that have commenced which are being developed slowly and 12 windfalls have been identified. These therefore will remain available as market houses for the whole Plan period. It is considered that these will meet the needs for the settlement over the Plan period.

The Authority has received a pre-application enquiry by Cartrefi Cymunedol Gwynedd on an unidentified windfall site in Dolgellau (on the existing Cartrefi Cymunedol Gwynedd offices) and wish to convert the offices to 5 affordable housing units. **This site could be considered a reasonable alternative windfall site to be included in the Plan provision should the Inspector consider the need to do so.**

3. Service Settlements

- 3.1 As has been outlined in the Authority's settlement capacity study there is limited land available for development in many of the settlements within this tier.
- 3.2 **Aberdyfi** – Aberdyfi is a coastal town with 49% of the existing properties occupied as second homes. Potential windfall sites are very limited due to topography and environmental constraints and the further release of sites is constrained by topography and the potential impact on the conservation area. Land has been allocated on Aberdyfi Primary School Site which is currently in public ownership for 100% affordable housing. Cartrefi Cymunedol Gwynedd are eager to purchase the site to develop affordable housing to meet the local needs in the area. A pre-application enquiry on the site by Cartrefi Cymunedol Gwynedd suggests that 11 units in total can be delivered on the site rather than the 6 proposed in the Plan. **This increases of 5 units could be included in the Plan provision should the Inspector consider the need to do so.**
- 3.3 **Betws y Coed** - The settlement is confined to a river valley surrounded by woodland and steep slopes. Low lying areas are in a C1 flood risk zone and due to the topography there are very few new development opportunities. The Authority has been working with Conwy CBC, the rural housing enabler and housing associations to identify suitable land for affordable housing. However, suitable development sites are very limited due environmental constraints and land ownership. The Authority continues to work with partners to identify potential exception site for affordable housing which can be progressed under the Eryri LDP exception site policy.
- 3.4 **Harlech** – The town has been subjected to inappropriate over-development in the past and the Castle forms an important part of the townscape and is also a world heritage site. The castle has an extensive zone of "essential setting" whereby any new development should not adversely affect its setting . Land has been allocated adjacent to Penrhwylyfa. No other suitable site has been identified that would not have a negative impact on the essential setting of the castle or direct development to inappropriate sloping sites Harlech has 11 existing commitments, and potentially 11 windfall sites.
- 3.5 **Llanberis** - Most of this settlement is outside the Park boundary.
- 3.6 **Trawsfynydd** – The settlement has 20 existing commitments that have already started with a potential for 7 windfalls. Land has been allocated for affordable housing at land adjacent Bro Prysor. Existing commitments are being developed very slowly due to

poor market demand. It is likely that the release of further land in this settlement would not be built due to marketability issues.

4. Secondary settlements

- 4.1 Some of the secondary settlements are small and rural in nature and allocating land for housing would result in a potentially damaging effect on the settlement pattern. While land is available in some of the settlements within this tier they are not all suitable housing development due to their location, availability of facilities and services and frequency of public transport or there is already land allocated for housing in the settlement. The only potential alternative site that could be considered appropriate as a reasonable alternative site is the land adjacent Ffordd y Felin, Brynchrug previously allocated in the adopted LDP. This site was taken out of the revised plan as the site had not been put forward as a candidate site at the call for sites stage and the Authority did not have sufficient evidence that the site would be deliverable. Since the Eryri LDP was placed on deposit the Authority has received a pre-application enquiry for the site. The site is already included within the housing development boundary, but to provide additional certainty to the Plan, **the site could be allocated in the Plan for 10 units should the Inspector consider the need to do so.** Brynchrug Community Council have also submitted comments in response to the Focussed Changes Consultation in support of the reallocation of this site.
- 4.2 **As identified above, the three sites that could be considered as reasonable alternative sites should the Inspector consider the need to do so include:**
- **Additional 5 affordable housing units by converting the Cartrefi Cymunedol Gwynedd Office – an unidentified windfall site in Dolgellau**
 - **Increasing the capacity of the allocated Aberdyfi Primary School Site by 5 units (to a total of 11 units)**
 - **Re-allocation of land adjacent Ffordd y Felin, Brynchrug for 10 units**
- 4.3 The Authority considers that the site at land adjacent Ffordd y Felin Brynchrug is the only reasonable alternative sites that should be allocated in the revised Eryri LDP should the Inspector consider the need to do so.

5. Exception Sites

- 5.1 In addition to these there are sites that could be considered appropriate, but sites have already been allocated in those particular settlements to meet the need of the community. These sites could be brought forward as exception sites should the allocated sites be developed and future need identified. The Plan can and will be flexible in bringing forward exception sites as proven in the past with the adopted Eryri Local Plan and the Authority will continue to work pro-actively with partners to bring forward exception sites. There are a number of other very small suitable exception sites for development which may arise for individuals to develop.

6. Conclusion

- 6.1 Having considered the evidence presented above the Authority considers that the proposed housing requirement of 770 dwellings and a total housing provision of 810 dwellings over the Plan period has been informed by robust assessment and has considered all the relevant evidence. As a result the Authority considers that no further alternative sites should be included in the revised Eryri Local Development Plan. The

proposed housing requirement of 770 dwellings Authority has not been subject to any objections the revised plan preparation.

- 6.2 Should the Inspector consider the need to do so the following three sites could be considered as reasonable alternative sites:
- **Additional 5 affordable housing units by converting the Cartrefi Cymunedol Gwynedd Office – an unidentified windfall site in Dolgellau**
 - **Increasing the capacity of the allocated Aberdyfi Primary School Site by 5 units (to a total of 11 units)**
 - **Re-allocation of land adjacent Ffordd y Felin, Brynchrug for 10 units**
- 6.3 The Authority could appraise these sites in terms of SA/SEA if the Inspector considers it necessary to include these sites.