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ERYRI LOCAL DEVELOPMENT PLAN EXAMINATION

MATTERS AND ISSUES FOR HEARING SESSIONS

1, 2 AND 3

Eryri Local Development Plan 2016 – 2031

Hearing Session 1:

Chapter 2 The Development Strategy Chapter 5 Healthy and Sustainable Communities – Housing Provision

Matters & Issues

Chapter 2 The Development Strategy

1. Has the Revised Plan been prepared in accordance with the necessary procedural requirements?

- a. Has the Revised Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?
- b. Has the Plan been subject to a robust: Sustainability Appraisal; Strategic Environmental Assessment; and Habitats Regulations Assessment/Appropriate Assessment?
- c. Has the Plan been informed by a robust consideration of reasonable alternatives?

2. Does the Plan's Vision continue to be sufficiently aspirational and locally specific to form the basis for planning to 2031? Are the proposed revisions to the LDP sufficiently specific to the National Park?

- a. Do they continue to reflect local distinctiveness?
- b. Do they have regard to the National Park Management Plan?
- c. Do they adequately reflect the statutory purposes and duty of National Parks?
- d. Strategic Policy A: A new criterion has been added regarding the production of Place Plans. Should the plan include an explanation of what Place Plans are and what they are designed to do?

3. Although no changes are proposed to the overall strategy, does it continue to be a coherent strategy from which its policies and allocations logically flow and is it founded on robust evidence?

- a. Does the scale and location of development continue to address the issues that the LDP has identified?
- b. Is the level of growth within the Settlement hierarchy justified and soundly based? Is there sufficient continued justification for the settlement categorisation?
- c. Are the percentage targets and ranges set out within Strategic Policy C appropriate and based on robust evidence?

- d. Does the Plan's Spatial Strategy represent a sustainable approach to planning, including in terms of transportation, over the Plan period?
- e. Is there sufficient continued justification for the pattern of housing and development distribution adopted? Is the inclusion of general market housing within Service Settlements and Secondary Settlements appropriate?

4. Is the Plan's Strategy sufficiently flexible to respond to changing circumstances? Does the Plan continue to provide robust mechanisms for the Monitoring and Implementation of the Plan's Strategy?

Chapter 5 Healthy and Sustainable Communities – Housing Provision

5. Is the spatial distribution of new housing consistent with the principles of sustainable development?

- a. Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?
- b. Will the spatial distribution of housing growth minimise any increase in car journeys, sustain rural communities and safeguard local facilities and services?
- c. Does the distribution of housing adequately relate to existing and proposed transport infrastructure, and relate to where people are likely to work, shop and participate in leisure?

6. Is the housing requirement figure of 770 (51 units per annum) appropriate and realistic to meet the needs of the Authority over the Plan period?

- a. Has the Revised Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales?
- b. In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections, e.g the 2014-based projections?
- c. Has the requirement figure been informed by a robust assessment of the main local influences on housing demand, including: household formation, migration, and household conversion ratios.
- d. Should the level of housing provision, Plan requirement and a list of housing allocations be included within Strategic Policy G?

7. Are the Housing Supply calculations and assessments within the Revised Plan appropriate?

- a. Are the figures set out within the Plan sufficiently up to date, accurate and clearly set out?

- b. Will the Plan provide a 5 year supply of housing for the duration of the Plan? Does the LDP provide a satisfactory total amount of land for housing development?

8. Have the inter-relationships between the LDP's growth strategy and the strategies of neighbouring authorities been taken into account?

- a. There is a continued acceptance in the Revised Plan that settlements outside the Park but on the border can provide housing, employment and other services for residents. Is there sufficient evidence that part of the need identified can be met by neighbouring authorities?

9. Will the level of growth proposed be delivered?

- a. Does the strategy rely too heavily on existing commitments and windfalls?
- b. Is the LDP's estimate of windfall sites coming forward realistic?
- c. Is the estimated number of conversions reasonable?
- d. Is the LDP's estimate of small site contributions too high?
- e. Are the proposed completions rates realistic? What are the implications of failing to deliver the required amount of housing?
- f. Is there sufficient flexibility to deal with the failure of sites listed in the LDP to come forward? Is the contingency (40 units) enough? Does the 5% slippage allowance provide sufficient flexibility in the event of sites not coming forward as anticipated?
- g. Are all the site allocations available and deliverable within the anticipated timescale?
- h. Are the allocations supported by a robust and comprehensive site assessment methodology, free of significant development constraints and demonstrated to be economically viable and deliverable?
- i. Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites, including in terms of sewerage capacity?
- j. Is allocating so many sites for 100% affordable housing (11 out of 16 allocated housing sites) a sensible approach where there may be viability issues that could affect delivery?

Affordable Housing:

10. Is the affordable housing target of 350 units appropriate given the overall need for 2,130 units? How does the Plan provide for the different types of tenure required to meet the need?

11. Are the thresholds for affordable housing delivery set out in 'Strategic Policy G: Housing' realistic and founded on a credible assessment of viability?

- a. Should Strategic Policy C specifically refer to the up to date figure for affordable housing need?
- b. Does the Plan maximise the delivery opportunities for the provision of affordable housing? Does the Plan strike an appropriate balance between landscape protection and affordable housing provision?
- c. Is the affordable housing target of 350 units achievable? Are those units anticipated within lower tier settlements and the countryside based on sound and robust evidence that takes adequate account of local housing markets and need?
- d. Is the Plan based on an up-to-date assessment of the full range of housing requirements across the National Park? Has there been an assessment of the required tenure mix (e.g. affordable, intermediate and social rented housing)? How will the Plan ensure a balanced mix of house types, sizes and tenure that are related to the needs of the area?
- e. Are the affordable housing contributions that are sought financially viable and based on sound methodologies and assumptions? How has the level of contribution taken into account rising build costs, including the sprinkler requirements introduced into the Building Regulations, and other associated costs?
- f. How will off site contributions be used to deliver affordable housing, and what mechanisms are in place to ensure that the levels of contributions sought are realistic and transparent?
- g. Past trends indicate that larger sites and those with Social Housing Grant (SHG) funding in place are more viable. How will the sites within the Local Service Centres, Service Settlements and Secondary Settlements be delivered? Will the required number of affordable houses be delivered?
- h. Is the Plan sufficiently clear on the delivery and viability of affordable houses within sub market areas?
- i. It is likely that individual plots and conversions will be developed by private individuals (as shown by past trends). In the absence of Social Housing Grants (SHG) being available for private developers, will such schemes be viable?
- j. What evidence is there of close liaison with housing providers in the National Park?
- k. Is there sufficient evidence that part of the need identified can be met by neighbouring authorities?

12. Does the Plan provide a sound basis for implementation and monitoring of housing provision?

- a. Does the Plan incorporate robust monitoring and review mechanisms that will enable the open market housing and affordable housing strategies to respond effectively to changing circumstances, such as changing market conditions?
- b. Does it contain clear identifiable targets and milestones as well as triggers for action if the numbers do not come forward as anticipated?

13. The Welsh Language and Communities

- a. Do the thresholds set out in Policy 18 continue to be fit for purpose?
- b. Would the requirement of a Community and Linguistic Statement to accompany a planning application for unanticipated windfall sites be unnecessarily onerous for development falling within this category?

Eryri Local Development Plan 2016 – 2031

Hearing Session 2: Chapter 6 Supporting a Sustainable Rural Economy – Economy/Employment, Tourism and Retail

Matters & Issues

1. A Sustainable Rural Economy (Strategic Policy H)

- a. What are the anticipated outcomes of the revisions to Strategic Policy H?
- b. A new criterion has been introduced to Strategic Policy H which suggests that where employment land is lost to an another use, land of equal or better quality will be made available elsewhere, even if it is not within the National Park boundary. How will this work in practical terms and what mechanisms will be put in place to ensure delivery? Should this be explained further in the Policy?
- c. Is the Revised Plan's overall approach to employment growth compatible with the levels of residential development proposed over the Plan period?

2. New Employment and Training Provision (Development Policy 19)

- a. In the absence of any new small-scale employment land allocations in the Revised Plan, will the continued reliance on the re-use and/or expansion of existing allocated land and buildings or new development on smaller, unallocated sites within or adjacent to towns or villages provide adequate employment land/premises to meet the needs of the Plan area?
- b. Is the Policy overly restrictive, especially regarding the potential for new build economic development opportunities outside settlements, such as small scale rural enterprises?
- c. Is there an over-reliance on the availability of employment land and premises in areas outside the National Park to meet the identified local need for employment and training development?

3. The Snowdonia Enterprise Zone

- a. Are there any constraints that could have an effect on the deliverability of the sites over the Plan period?

- b. What are the timescales for anticipated delivery and have there been any discussions with or interest shown by potential investors and developers on either site?
- c. What implications would the Enterprise Zone have on the development strategies of neighbouring authorities, and vice versa?
- d. Is the policy sufficiently flexible in terms of the type of development that could be accommodated on the site, both in terms of the use, the scale and the design of buildings? How will the Plan deal with proposals for major development on the site?
- e. Are there any infrastructure constraints at either of the sites that could affect delivery and viability?
- f. What are the flooding implications on the allocation of land at Llanbedr Airfield? There is an objection by Natural Resources Wales due to the Flood Consequence Assessment confirming that parts of the site are unsuitable for development.
- g. Are the allocation boundaries of the two sites correctly drawn?

4. Tourism and Recreation

- a. The revised plan introduces text that refers to the importance of adventure tourism and eco tourism to the National Park. Does the Plan, through Strategic Policy I and Development Policies 21 and 28 provide an appropriate framework for the consideration of proposals for new or enhanced tourism and leisure facilities and accommodation?
- b. Do the policies in the Plan, including new Policies 28 and 29, achieve an appropriate balance of provision and restraint in relation to existing and proposed tourism and recreation development, including any potential major development opportunities?
- c. Will the Snowdonia Dark Skies Reserve have an impact on the ability of existing tourist attractions and accommodation to expand and improve facilities?
- d. The additional text within Paragraph 6.34 refers to the location of tourism and recreation development within open countryside and the potential impact it has on the landscape. How will this be controlled and assessed and should this be included within Policy?
- e. Does the first sentence in Policy 21 read correctly - "Within the National Park the provision of existing tourist attractions will be protected...."

- f. Development Policies 22 and 23: Will the additional text in paragraph 6.40 and the policy have an adverse effect on business viability and the number of tourists to the area due to the inability to increase static numbers on site, even if there is an overall improvement to the site?
- g. Paragraph 6.37, Development Policy 28 seems to encourage and discourage new build accommodation. Are the changes introduced by the supporting paragraphs and the new Policy 28 clear in terms of the provision of new build serviced accommodation?
- h. How will proposals for new serviced accommodation outside of the named settlement hierarchies be assessed, for example, on agricultural diversification schemes?
- i. The LDP recognises the importance of tourism and leisure to the economy. Is Policy 29 too restrictive and inhibit opportunities for the development of a facility which may benefit the economy?
- j. Has there been adequate assessment of the demand and requirements for alternative holiday accommodation?
- k. Will Policy 29 result in a 'blanket approach' which will inhibit the ability of each proposal to be considered on its particular merits? Should there be a differentiation between different areas of the National Park?

5. Retail (Development Policy 24)

- a. Is the distance of 300m introduced by the proposed revision in line with national policy and based on robust evidence? Is the term 'buffer zone' appropriate in this context?
- b. Is the policy clear on proposals for the change of use of vacant shops/units to residential use within other settlements not listed within the policy, especially affordable housing, where there is a proven local need?

6. Does the Plan continue to incorporate robust monitoring and review mechanisms that would enable the economic/employment, tourism and retail strategies and policies to respond effectively to changing circumstances?

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Hearing Session 3:

Chapters 3 & 4 The Natural, Cultural and Historic Environment

Matters & Issues

The Natural Environment

1. Strategic Policy D 'Natural Environment':
 - a) Although no changes are being proposed to this policy, does it continue to fulfil its purpose in protecting natural resources, biodiversity, geodiversity and the special qualities of the National Park?
2. Dark Skies Reserve and Dyfi Biosphere Reserve (Development Policy 2):
 - a. The additional text within the Plan clearly recognises the importance of these designations. However, should the Plan acknowledge that development within certain parts of the National Park will inevitably have an impact on these designations?
 - b. Will the Dark Skies Reserve designation result in a 'blanket approach' to the assessment of developments? And should there be a differentiation between different areas of the National Park?
 - c. Do the policies provide sufficient clarity on the way in which development proposals, which are likely to impact on these designations, will be considered and where mitigation and compensation measures will be required? Should this be included within policy?
 - d. Does the Plan provide sufficient guidance to developers/applicants on what information they need to provide in support of any planning application? Should this be clarified within Development Policy 2?
3. Development Policy 3 'Energy' :
 - a. The changes to the Plan (supporting text to Development Policy 3) acknowledge the importance of hydro power stations and microgeneration schemes. Although no changes are proposed to the policy, how will the plan assess future schemes?
 - b. The Plan recognises that the landscape of the National Park is sensitive to wind turbine developments. Does the Plan comply with National Policy regarding the thresholds for different

technologies, and should the Plan provide additional guidance to developers on the nature and scale of proposed renewable energy schemes within the Park?

- c. How will proposals on the boundary of the National Park within adjoining LPAs be assessed.

4. Minerals:

- a. Do the changes proposed to Strategic Policies E1, E2 and E3 comply with national policy and provide a clear basis for dealing with developments on safeguarded aggregate or mineral deposits, as well as assessing new proposals for mineral extraction within the National Park?
- b. Does the Plan provide sufficient guidance to developers/applicants on what information they need to provide in support of any planning application? Should this be clarified within the Plan?

5. Waste:

- a. Does Development Policy 4 provide a clear framework for assessing applications for new waste management facilities?
- b. Does the Plan provide sufficient guidance to developers / applicants on what information they need to provide in support of any planning application? Should this be clarified within Development Policy 4?

Cultural and Historic Environment

6. Strategic Policy Ff 'Historic Environment':

- a) Is the reference to the Candidate World Heritage Sites within the policy and on the constraints map premature given that it is only included on a tentative list submitted to UNESCO?
- b) How will planning applications within these areas be assessed during this interim period?

7. Development Policy 9 'Conversion and Change of Use of Rural Buildings'

- a) What is meant by the term 'rural diversification scheme'? Should this be 'agricultural diversification' in line with Development Policy 20 for consistency? If so, should both policies cross refer to each other.

- b) Should the policy provide clarification and further justification on the requirement for the payment of a commuted sum for open market dwellings. Should the policy cross refer to Strategic Policy Ch?

8. Does the Plan provide a sound basis for implementation and monitoring of the natural, cultural and historic environment?