

# 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?