

**Archwiliad
Adolygu
Cynllun Datblygu
Lleol Eryri
Snowdonia Local
Development Plan
Revision
Examination**

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Mrs Rebeca Jones
Head of Planning Policy
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National Park Offices
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Gwynedd, LL48 6LF

Dear Mrs Jones,

**Snowdonia National Park Authority
Local Development Plan 2016 - 2031 Revision Examination**

I refer to my letter dated 9 February 2018 and your response dated 16 February 2018 regarding the Focussed Changes that the Authority is proposing to make to the LDP. Due to the time it will take to prepare and undertake the public consultation process I have decided that the most appropriate course of action would be to suspend the Examination until the end of April 2018. As soon as the public consultation period has finished and the additional information/documentation has been submitted I will write to you again to set out the timescale for the resumption of the Examination process.

In the meantime, I want to take this opportunity to raise a number of other matters with you:

1. It is unfortunate that the Authority has updated the evidence base contained in Background Papers for the Examination after the publication of the Deposit Plan (Summer 2017). The revised evidence base has inevitably resulted in a number of Focussed Changes many of which are, in my opinion, significant changes. The Authority should ensure that the updated evidence base is also referred to in the public consultation.
2. Appendix 28 'Main Issues' of the submission documents refers to an update to the evidence base to reflect the 2014 household projections but this is not included as a Focussed Change. It would seem to me that the Plan (policies and supporting text) should refer to the most up to date projections as it will form the basis for future planning decisions, especially in the context of the other proposed changes to Strategic Policy C and G. The Authority needs to clarify why the Plan should not be amended to reflect the most up to date information.
3. The table under Para 5.7 page 74 of the Deposit Plan (no table number or title) states "subject to further refinement" under C and "approximate housing provision" under E. The use of these terms provides uncertainty and should be avoided. The Authority should clarify whether further work is being undertaken in this regard and, if so, the deadline by which this work is to be completed and available for presentation to the Examination?
4. Table 1 contained in DC22-7A - Housing 2 contains different figures to the table referred to in 3. above. Taking into account the rural nature of Snowdonia the changes to the total housing provision

within each tier shown of Table 1 are significant, and the Authority should provide further detail to clarify this position.

5. Revised Strategic Policy G reduces the Affordable Housing requirement for the plan period to 350 due to viability constraints; retains the requirement for sites to have regard to the findings of the LHMA; and introduces amended percentage targets (20%, 33%, 50% and 100%) and threshold (sites over 2, 3 and 5 dwellings) for the provision of affordable dwellings on sites depending on land ownership and location. The changes to the Strategic Policy and its supporting text are, in my view, significant as they fundamentally change the approach to securing affordable housing. It is noted that the Authority has included some explanation in DC22-7A Housing, which cross refers to DC32 -18. - SNPA Affordable Housing Viability Study, however, further evidence needs to be provided on how the changes to the percentages and thresholds have been defined.
6. The revisions do not provide any **up to date** figure for housing need over the Plan period either in terms of the number, type and mix of new dwellings required. It is suggested that this is attributable to the delay in preparing the Gwynedd LHMA (Background Paper 7, para 26 - 28) and due to resourcing. The Authority should provide additional up to date evidence on the affordable housing need for the Plan period.
7. Some of the evidence supporting the changes to Strategic Policy C is contained in Background Paper 18. - SNPA Affordable Housing Viability Study but there are a number of things that need further explanation, including: how the sub-market areas have been defined and, if they are based on the LDP, why are they appropriate; what are the benchmark land values and how have they been derived; the range of housing prices across the area by type of property and how this has changed over time; build costs per square metre; and how developer profit has been defined. Given the importance placed by national policy on delivering affordable housing a Hearing session will explore whether the Plan is proposing the correct balance of affordable housing and its delivery. Given that the consultants findings identified the degree to which the local housing market and prices can affect viability, a further update would be helpful especially as a period of over 1.5 years will have passed by the time this is discussed at a hearing. It will also provide an opportunity to consider the effects of the introduction of the requirement for sprinklers in all new homes and any Section 106 contributions (in line with Strategic Policy Ch) on the viability of schemes.
8. Appendix 2 to 'DC32-18 – Affordable Housing Study' is meant to show a 0.5 ha worked example as a tool to inform the viability of schemes. However, the screenshot on page 27 shows the site size as 1.0ha. Assuming that a 0.5 ha site example was chosen for a reason, i.e. a smaller example site is more appropriate to SNPA (see paras 1.6, 3.2, 3.12, 3.18, 3.19, 3.25 of DC32-18), and that the viability results are dependent on the site size, is this evidence reliable given the reference to 1.0ha, and does this evidence need to be re-run? What are the implications of this?
9. Appendix 28 'Main Issues' of the submission documents refers to an objection by Natural Resources Wales to the allocation of the Snowdonia Enterprise Zone in Llanbedr due to the Flood Consequence Assessment confirming that parts of the site are unsuitable for development. The document states that "further discussions and flood risk modelling have been undertaken by the site developer, as a result of this modelling further discussions have taken place and are ongoing between NRW and the Authority". I would be grateful to receive information on the scope of these discussions, progress to date and the deadline by which a final decision would be available for presentation to the Examination.
10. Appendix 28 'Main Issues' of the submission documents refers to objections by Welsh Government and Snowdonia Aerospace LLDP regarding the boundary of the Snowdonia Enterprise Zone in Llanbedr. The Authority states that "dialogue is continuing between the Authority, the Welsh Government and Snowdonia Aerospace LLP with regards to the boundary and allocation at Llanbedr, and that minor changes may be necessary as a result of these discussions". I would be grateful to receive information on the scope of these discussions, progress to date and the deadline by which a final decision would be available for presentation to the Examination.
11. It is welcomed that the Authority will prepare a revised Sustainability Appraisal/Strategic Environmental Assessment as part of the Focussed Changes. The Authority also needs to show that it

has appraised all reasonable alternatives, including any candidate sites in line with paragraph 5.3.4.9 of the LDP Manual. The SA/SEA currently only appraises allocated sites, and does not present findings for alternative sites. Therefore, in addition to work undertaken on the SA/SEA as a result of Focussed Changes, the Council should take the opportunity to present the appraisal of all reasonable alternative sites, or (where applicable) site assessments that were undertaken prior to the SA/SEA process.

You are requested to respond to the above points by 2 March 2018, setting out a detailed timescale for any further work which you may intend to undertake.

The Authority queried whether a Pre Hearing Meeting is necessary for this Examination. Having regard to the representations submitted by interested parties and the fact that I will be preparing and circulating a detailed guidance note to representors explaining the Examination process, I don't feel that one will be necessary. Given that the Focussed Changes consultation period ends on 27 April, and the need to advertise the start of the hearing sessions at least 6 weeks prior to the start, I would hope to be in a position to hold the hearing sessions over one week in early July, but this will be confirmed in due course.

If you require further clarification on any of the above then please do not hesitate to contact me via the Programme Officer.

Yours sincerely,

Richard Duggan

Richard Duggan
INSPECTOR

c.c Mark Newey, Welsh Government Planning Division