

Matters Arising Statement

From: Rhys Davies, Cadnant Planning

Date: 16 August 2016

Subject: Hearing Session 3
Housing – Spatial Distribution

Introduction

1.1 Cadnant Planning Ltd submitted an objection to Policy TAI17 as it is fundamentally at odds with the advice set out in Planning Policy Wales which seeks to sustain rural communities and safeguard local facilities and services. For ease of reference our additional statement sets out our responses to the specific questions raised on the Matters & Issues Agenda for Hearing Session 3:

Matters to be addressed

Is the strategy for the spatial distribution of new housing consistent with the principles of sustainable development?

a) Will the spatial distribution of housing growth minimise any increase in car journeys.

b) Will the strategy sustain rural communities, and safeguard local facilities and services

1.2 In achieving sustainable rural communities and tackling deprivation delivering good quality housing is vital. It is emphasised that there is a need to maintain a mix of tenure and size of housing to ensure communities are adequately balanced. It is identified within paragraph 10.5 of The Wales Spatial Plan that;

“accommodating appropriate development in smaller settlements and rural areas is vital for supporting the development of more rural communities.”

1.3 Paragraph 9.1 of Planning Policy Wales highlights the Welsh Government's approach to housing strategy and states that;

"The Welsh Government's approach, set out in the National Housing Strategy, is to:

- Provide more housing of the right type and offer more choice;
- Improve homes and communities, including the energy efficiency of new and existing homes; and
- Improve housing-related services and support, particularly for vulnerable people and people from minority groups.

The Welsh Government will seek to ensure that;

- Previously developed land is used in preference to greenfield sites;
- New housing and residential environments are well designed, meeting national standards for the sustainability of new homes and making a significant contribution to promoting community regeneration and improving the quality of life; and that
- The overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains and, where practical, enhances important landscape and wildlife features in the development."

1.4 The importance of housing as an economic driver was made clear by the Minister for Housing and Regeneration in July 2013 when he stated that:

"Building more homes will not only meet growing housing need, but also generate growth and jobs, provide work to help people out of poverty and ameliorate the effects of the bedroom tax. The private and public sectors must be enabled and supported to play a full role in building more homes. I have looked carefully at all the tools available to me, including regulations, policy and funding, and am today announcing a package of measures which together should increase the supply of new homes across Wales. The actions set out in this statement represent the first phase of action in this area and demonstrates the priority I accord to increasing the supply of housing."

1.5 It is considered that only allowing affordable housing within Local, Rural and Coastal Villages will weaken communities both socially and economically resulting in an increase in deprivation. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities.

1.6 It is vital that rural communities' vitality and attractiveness is sustained and enhanced. Restricting development to affordable housing will have a detrimental effect by deprivation

on these communities and on the economy of Anglesey and Gwynedd. It is emphasised within The Wales Spatial Plan that there is a need to maintain a mix of tenure and size of housing to ensure communities are adequately balanced. Also Paragraph 9.1 of Planning Policy Wales emphasises that the Welsh Government seeks to ensure that there is a mix of affordable and market housing within villages.

- 1.7 Housing development in Anglesey and Gwynedd is vital in sustaining rural economy. Developers experience difficulty in funding developments for 100% affordable homes as they are unviable. Restricting housing development to affordable housing will result in the deprivation of Local, Rural and Coastal Villages. This requirement is unviable and will restrict housing development within these villages as developers will not be able to build 100% affordable housing. This will have a direct detrimental impact on the economy of Anglesey and Gwynedd as housing developers are important economic drivers within the rural economy as they generate growth and jobs by providing work to help people out of poverty.
- 1.8 The strategy of only allowing local need or affordable housing within settlements such as Llandegfan, Dwyran, Y Felinheli, Moelfre, & Trearddur is also likely to lead to the loss of key local services such as the Primary Schools. The plan strategy as a whole is likely to fail to deliver the required level of housing. The delivery of local need and affordable housing can only be achieved through balanced and viable development which incorporates a mix of open market and affordable housing.
- 1.9 The “local needs” housing in effect duplicates the affordable housing provision and is not necessary or deliverable.

Is the spatial distribution of new housing opportunities?

Sustainable and coherent?

a) Have settlement boundaries been drawn consistently and coherently?

- 1.10 No – settlement boundaries have been tightly drawn to ensure that development is constrained. However, the windfall figures for settlement where development boundaries have been tightly drawn are high and do not reflect the constraints imposed on delivery of housing brought about by tightly defined settlement boundaries plus the requirement for only local need or affordable housing.

b) Is the approach to identifying rural clusters consistent and coherent?

1.11 No – some of the identified clusters are not distinct settlements but simply a group of houses uncharacteristic higher density groups of houses in open countryside e.g. Capel Parc, Hebron and Hendre Hywel, whereas other lower density but clearly recognisable villages and clusters are excluded e.g. Penmynydd.

c) Are the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?

1.12 No – windfall opportunities are disproportionately high in some settlements and is an indicator that the plan will not deliver the anticipated housing target e.g. Beaumaris, Rhosneigr and Criccieth.

d) Does the distribution of housing adequately relate to existing and proposed transport infrastructure?

e) Does the distribution of housing adequately relate to where people are likely to work, shop and participate in leisure?

1.13 No – the constraints placed on housing provision within local and coastal villages with strong Welsh speaking communities and popular Primary Schools such as Y Felinheli and Llandegfan means that an adequate level of open market housing will not be provided in settlements where, recent house building has been successfully delivered and occupied by local persons.

f) In the absence of defined development boundaries in the cluster settlements can the level of growth be effectively controlled?

1.14 The policy allowing housing only immediately adjacent to a marked dwelling within the cluster will control growth.

g) How do the existing housing completions / sites under construction, which count towards the overall housing target, fit into the proposed strategy for the distribution of housing?

1.15 No comment.

Does the Plan incorporate robust monitoring and review mechanisms that will enable the spatial distribution of new housing to be implemented and monitored?

1.16 No comment.

Any other matters

1.17 No comment.