

**GWYNEDD AND ANGLESEY JOINT LOCAL DEVELOPMENT PLANT
EXAMINATION**

**HEARING SESSION 10 NORTH GWYNEDD ALTERNATIVE DESIGNATIONS
AND SITES**

TUESDAY 27 SEPTEMBER 2016

FURTHER COMMENTS

REPRESENTOR NO. – 34 COMMENT NO. – 839

REPRESENTOR NAME – GEORGE DENHAM

AGENT – BURUM CONSULTATIVE SERVICES (OWAIN WYN)

SITE REFERENCE	SITE NAME	SITE SIZE	EXISTING USE	PROPOSED USE
SP586	Land near Tyddyn Pandy	3.24 ha	GRAZING LAND	HOUSING

Which part of the Plan is considered unsound (policy/paragraph/page of Plan)?

Strategic Policy PS15 THE HOUSING SPATIAL STRATEGY

Policy Tai14 HOUSING IN THE SUB-REGIONAL CENTRE AND THE URBAN SERVICE CENTRES – Caernarfon Housing Designations

Which tests of soundness (see paragraph 2.5.11 of PPW), are not met?

Criterion 2. Is the plan appropriate (i.e. is the plan appropriate for the area in light of the evidence?);

Criterion 3. Will the plan deliver? (i.e. is it likely to be effective?).

Why does it fail?

Criterion 2

It is unclear from the evidence submitted as a basis for PS15 why it was decided to tally the Sub-regional Centre (Bangor) and the Urban Service Centres

(including Caernarfon) together on a level of 55%. Consequently, there is no firm evidence base to allocate a total of 384 houses for Caernarfon. It is accepted that the settlement score¹ is not the only basis used as a basis for the allocation. However, it is unclear to what degree the Local Development Plan (Deposit) also reflects the wishes of Welsh Government for Caernarfon to develop as a hub within the MônMenai Regeneration Area which includes a reference to the objective of developing private housing as a tool to stimulate that regeneration.

Criterion 3

It is considered that the Plan will not be effective for three reasons:

Firstly, under Policy TAI 14 a total of three sites with an allocation of 194 houses have been identified in Caernarfon. In addition, the potential to realise 190 houses on other sites within the development boundary of the settlement has been identified, which makes a total of 384.

In Table 16 of Paper 5A, it is anticipated that the expected growth over the period of the Plan is 415. Therefore, the percentage of the expected growth which is to be delivered on allocations by 2026 is 46.75%, which is less than half. It is considered that this raises crucial questions regarding the ability of the Deposit Plan as it stands to deliver on its proposals.

Secondly, it appears that site T28 Lôn Cae Phillips has been counted twice when considering the allocations needed for Caernarfon. In paragraph 8.4.6 of Background Paper 5A² and Table 16 when discussing the settlements' ability to cope with the expected growth level, the Councils say that they have already considered the following factors:

- Completed units (2011-14);
- The existing housing bank (those likely to be completed);
- Possible growth identified in the Urban Capacity study;
- Additional land allocated

Site T28 received permission in January 2013 and Phase 1 of the development (which contains 19 houses) has already been completed, and a large proportion of Phase 2 has commenced. It is possible to argue therefore that this site should not be included as a designation as a large proportion of it will already have been delivered before the Plan comes into effect.

Thirdly, there is doubt whether site T27 is likely to supply houses of the appropriate mix and occupancy in accordance with Policy Tai 2. This land, which is in Gwynedd Council ownership, has already been designated for housing in the Gwynedd Unitary Development Plan, and has been available for over 10

¹ See Paper 5A Developing the Settlement Strategy, Table 12

² Op. Cit.

years. So far, there is no evidence that developers are interested in procuring the site.³

It could be argued that its location is not suitable either as it is an extension to the built form of the town, behind several public sector housing developments which already exist and comparatively far from the town centre.

How can the Plan be made sound?

Criterion 2

The Plan will be sounder by being more explicit regarding what the evidence base is over the number of designations determined for Caernarfon and to what degree the Government's objective to stimulate private housing developments to support the efforts to regenerate the town of Caernarfon has been considered.

Criterion 3

The Plan will be sounder by amending the south-eastern development boundary of Caernarfon to include site SP586 which has room for approximately 80 houses and is available to develop within the period of the Plan and by doing so increasing the efficiency of the Plan.

What exactly is the change/wording requested?

Settlement Boundary

No change to the wording of the Plan but amend the boundary of the settlement of Caernarfon to include a site near Tyddyn Pandy (SP586)

Policy TAI 14

(i) Designations

Urban Service Centres

Either:

Add – T27(a) Land near Tyddyn Pandy (SP586)

Or:

Omit – T27 to the rear of Maes Gwynedd and T28 Lôn Cae Phillips to be replaced by land near Tyddyn Pandy (SP586) (T**)

³ E.g. no planning application has been submitted to develop it

Owain Wyn
BURUM Consultative Services
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