

# **EXAMINATION IN PUBLIC: STATEMENT IN RESPECT OF SESSION 12 - ALLOCATIONS AND ALTERNATIVE SITES - LLYN ID NO. 3189**

## **1. Which particular part of the Plan is unsound?**

Policy TA114: Housing in Sub-Regional Centre and Urban Service Centres.

Namely, the housing land allocations for Pwllheli on page 157 of the Deposit Plan.

## **2. Which soundness test(s), set out in paragraph 2.5.11 of PPW, does it fail?**

The Plan fails in two of the three soundness tests set out in PPW - ie the Plan is not appropriate for the area in the light of evidence (test 2) and it is unlikely to be effective (test 3).

## **3. Why does it fail?**

The Plan's allocation of housing land in Pwllheli is inadequate in terms of its proportion of the 55% target for delivery in the Primary Settlements and the town's continued role as an Urban Service Centre. Also, within this allocation, the over-dependence on a single large site (T29 - Land near Lon Caernarfon) with 150 housing units proposed will effectively create a linear urban extension on "greenfield" land with poor connectivity to the town centre. The considerable number of written objections to the allocation of site T29 included one from the Council for the Protection of Rural Wales, on "grounds of unacceptable ribbon development, damaging landscape impact and significant traffic and access issues". The CPRW suggested that alternative sites could be identified in other parts of Pwllheli.

## **4. How can the Plan be made sound?**

The Plan does not take enough account of social considerations, particularly the need for affordable housing and for special needs housing in an accessible location. The allocation of additional / alternative land for housing adjacent to the town centre would help deliver the Plan's sustainability objectives and thereby, its overall soundness.

Out of all the options for residential development in Pwllheli, land to the south side of Ala Road (Candidate Site SP765) offers the most sustainable (and sound) location. Not least, it provides the best opportunity to reduce travel as it is within easy walking distance to public transport and town centre services / facilities. (The distance from Bro Llwyn to both bus and train stations is 0.5mile - 10 minutes walk - and there are bus stops along Ala Road serving a number of local bus routes on the Lllyn Peninsula).

Development of the site would also regenerate brownfield land (the town's former refuse dump) that is currently having a negative effect on the townscape. It would integrate exceedingly well with the existing settlement form and could be viewed as the natural geographic extension of Pwllheli's built footprint rather than the allocation of site T29 on the far edge of the town which constitutes encroachment into open countryside.

In its current state, the land is an under-used asset, used for grazing while much is unsightly and overgrown, resulting in some local residents using the land for fly-tipping. The potential to be realised is significant in terms of the efficient use of the land as, not only, a sustainable housing site, but also, the additional benefits of contributing towards the alleviation of flooding along the Afon Rhyd-ir and the creation of a wildlife reserve / local amenity area / walkway.

## **5. What is the precise change/wording that is being sought?**

In the light of the above, the changes required would be an amendment of the Pwllheli development boundary to include land along and adjacent to the south side of Ala Road. The Deposit Plan excludes the whole of Candidate Site SP765 from the Proposals Map, despite the opportunity to provide housing on "brownfield" land on the edge of town centre - thereby providing a more sustainable alternative to the allocation of

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T29. As a result of the strength of objections to the allocated site, consideration should be given to a reappraisal of the housing land allocations in Pwllheli with a view to a more sustainable outcome.

### **a. What is the name / reference of the site?**

Map 8 - Ala Road, Pwllheli

Candidate Site SP765 - land adjacent Bro Llwyn, Pwllheli.

### **b. What is the current status / use of the site and what is the proposed use?**

Unallocated / currently low value grazing land and scrub vegetation / proposed residential use on part.

### **c. What is the size of the site and what scale / numbers of units are proposed?**

40 acres in total / The whole site should be viewed in terms of allowing approximately a third to a half for mixed residential development with the remainder incorporated into a major structured development scheme to provide water storage lakes within a wetland nature reserve. An engineering report shows a simple cut and fill scheme on the fields closer to the river could significantly alleviate the issues associated with town centre flooding in times of unusually heavy rains and high tides. This engineering work could be considered in detail by Natural Resources Wales and developers if the entire site is considered rather than piecemeal development of individual housing plots on the higher ground to the north.

### **d. Are there any significant obstacles to the development of the site within the Plan period?**

Yes - the site falls within a C1 flood risk zone, so development would require appropriate alleviation / protection measures. In this respect, the entire site provides a key opportunity to deliver a comprehensive scheme whereby the relevant agencies could work together towards a holistic approach to the creation of additional flood alleviation together with a dedicated wildlife / nature reserve within or close to a mixed residential development designed to satisfy needs and demands that are already established and clearly evidenced.

### **e. What are the anticipated timescales for delivery?**

5 to 10 years - however, there is already evidence of demand for land in this position. In this respect, the landowner has received a formal offer for part of the land fronting Ala Road for a service usage. The local Housing Association has indicated it would be very interested in taking a substantial plot adjacent to the town centre. A local agent has confirmed it to be a site where there would be demand for substantial individual plots and in the past, a major national retailer has indicated real interest in locating a unit on the land nearest to the town centre. Therefore, there is irrefutable evidence of demand. Also the entire site was initially in the Candidate Site register produced by the Council. Its failure to be included in the Deposit Plan as a development site could have resulted over concerns there may not be enough demand. There is clearly already a level of demand and this is an important site that the Council felt merits serious consideration.

### **f. Should the site be included within the settlement boundary and / or be allocated?**

Yes - the northern half of this land is, in effect, a natural geographical extension of Pwllheli's built footprint, being enclosed on three sides by the town and extending

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westwards to the existing petrol filling station, which marks the 'de facto' settlement boundary along the south side of Ala Road.

### **g. Is the site necessary to ensure that the LDP is sound?**

Yes - in terms of upholding sustainable development principles, the inclusion of this site (rather than T29) to provide a major proportion of the town's allocated housing land over the next 10 years would strengthen the soundness of the Plan. Instead of producing an urban extension of linear form along the A499 Caernarfon Road on greenfield agricultural land, a more compact option within close walking distance of the town centre would be afforded by the development potential of this site.

### **h. How would the alternative site contribute to the aims and strategic objectives of the Plan?**

The alternative site would contribute positively to Strategic Objective 14 - ie to ensure that a sufficient and appropriate range of housing sites are available in sustainable locations in accordance with the settlement hierarchy.

In addition, the proposal to transfer the majority of the land into a community asset would also contribute to Strategic Objective SO16 - which seeks to protect, enhance and manage the natural and heritage assets of the Plan area, including its natural resources, wildlife habitats and its landscape character and historic environment. It would also support the Plan's broad spatial strategy aims to improve sustainability by focusing the main developments and regeneration in the Primary Settlements and the strategic sites therein. The Plan acknowledges that settlement boundaries will be amended to reflect proposed development and to provide for a combination of market and affordable housing. Such an amendment to Pwllheli's development boundary to include the developable land at this location would fit closely with this course of action.

### **i. Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?**

The site selection process was reasonable, however, it was carried out without full knowledge of the landowner's intentions for Candidate Site SP765 - ie that only the higher area of land, nearest to the town centre and accessible from the Ala Road frontage would be for built development. The robustness of the process must therefore be questioned as it did not take into account the substantial potential additional benefits for the town in terms of helping flood alleviation and providing a long-term community asset that protects the wildlife and habitats of the Afon Rhyd-ir.

### **j. Has the alternative allocation sought been considered in respect of the Sustainability Appraisal/Strategic Environmental Assessment? Would the change be likely to have significant effects that require re-assessment? If so, has such an assessment been carried out? What was the outcome of the process?**

A Sustainability Appraisal was completed for this site. However, in terms of the Strategic Environmental Assessment, the proposal for the whole site is to provide both some land for housing development as well providing land in the flood plain to help alleviate the flooding problems experienced in parts of the town. This would be through the capture and storage of flood water on a controlled basis as opposed to the current inadequate measures, which impact negatively on the future of the town. This significant opportunity has been offered subsequent to the SEA and may therefore require a re-assessment in terms of the potential environmental benefits this would bring.