Hearing Session 12

ALLOCATIONS AND ALTERNATIVE SITES: GWYNEDD – LLŶN

9.30 am, Thursday 29 September 2016

This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to the Allocations and Alternative Sites in Llŷn (Gwynedd) Economy – Employment, Retail and Tourism in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

PWLLHELI

a) Site Reference / Name:

- **Land at Penlon Llŷn, Pwllheli**
- **Rep ID: 1435 & 001 (H&V Williams, 2145)**

- Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.

Response

- Objectors drew attention to legitimate issues relating to allocation T29's ability to deliver the number of units set out in Policy TAI14 (the presence of a stream and trees on part of the site, and the site's topography and shape means that it is unlikely that the site will deliver 30 dwellings per hectare). On this premise the Unit has reviewed objections relating to amendments to the development boundary to determine whether minor amendments could be made to ensure sufficient flexibility within the Plan to deliver the Plan's strategy and objectives.

- No serious issues were raised about this site during the plan preparation process and forms a reasonable extension to the existing built form. Focussed Change NF119 (and a further matters arising change) amends the development boundary to include part the site to help towards achieving the indicative figure for the settlement.

- The entire site, as requested by the objector, has not been included within the development boundary because discussions with the Highways Department stated that a maximum of 8 dwellings can be accommodated on site due to the capacity of Lleyn Street.

a) Site Reference / Name:

- **C6 - Land at Adwy'r Hafan, Pwllheli**
- **Rep ID: 1082 (Natural Resources Wales, 1521)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the	• Safeguarded Primary Employment Site • 10.5ha

proposed use?	• B1 & B8 uses • The representor wishes the employment allocation be deleted as it falls within a C1 Flood Zone.
c) What is the size of the site and what scale / numbers of units are proposed?	Total area - 10.5ha. The undeveloped parcel of land on the site is 1.5ha.
ch) Are there any significant obstacles to the development of the site within the Plan period?	The safeguarded employment site is located within a C1 flood zone. Safeguarding the employment site ensures that the current uses on site remain for employment purposes. In accordance with TAN15 employment uses are deemed to be less vulnerable development and following satisfaction of the criteria as set out in section 6 of TAN15 employment development within C1 flood zone may be appropriate. Most of the site has previously been developed and the vacant plot of land (known locally as Cae Ceffyl) has been granted planning permission for a hotel. As the Councils are not promoting the amendment of this site, it is for the representor to demonstrate that without the changes the site is not deliverable.
d) What are the anticipated timescales for delivery?	N/A
dd) Should the site be included within the settlement boundary and /or be allocated?	Yes. Safeguarding the current employment site will ensure that the current units remain for employment purposes and continue to satisfy the required employment needs within the area.
e) Is the site necessary to ensure that the LDP is sound?	Yes, the employment allocations and their use classes are supported by the Plan's evidence base. It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the amendment to this site this is for the representor to demonstrate.
ff) Is the Council's site selection	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a

process reasonable and appropriate and is it founded on a robust and credible evidence base?	robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan. The Employment Rand Review (DC.004) assessed the suitability of each employment site to assess the likelihood that the sites would be developed within the Plan period. Following the assessment of the sites suitability (based upon locational and infrastructure factors) the sites were divided into prime and secondary sites. The prime sites are those thought to be most attractive to the market and are more likely to be developed in the short term. Secondary sites may be in inferior locations in terms of access/market presence compared with prime sites but they retain an important role as they represent opportunities that are highly relevant to the Energy Island Programme or serve a local need in more remote or rural areas. Within the Employment Land Review Adwy'r Hafan has been recognised as a primary Employment Site.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the amendments to the site it is for the representor to demonstrate alignment with the SA/ SEA. This site is being supported by the Councils. All allocations have been assessed against the SA Framework found in the Sustainability Appraisal (Feb 2016) (CDLL.007).

a) <u>Site Reference / Name:</u>

- **SP765 - Land at Ala Road, Pwllheli**
- **Rep ID: 1049 (Owen Lloyd, 3189 c/o Michael Hand, 1459)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.
c) What is the size of the site and what scale / numbers of units are proposed?	15.3 ha – Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 459 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable. The site falls within a C1 flood risk zone – no flood consequences flood risk assessment has been provided by the representor.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. The site falls within a C1 flood risk zone. The Deposit Plan and its supporting documents, which includes an Urban Capacity Study (Topic Paper 6, PT.0013), clearly demonstrates that there is sufficient land allocated, windfall opportunities and a landbank provision within the Deposit Plan Development Boundary for Pwllheli to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No, there is sufficient land allocated, windfall opportunities and a landbank provision for housing development within the Deposit Plan Development Boundary for Pwllheli to meet the housing need identified in the Plan. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound. Therefore, It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.

ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

a) <u>Site Reference / Name:</u>

- **Land at Ysgubor Wen, Penrallt, Pwllheli**
- **Rep ID: 994 (Gwyn Llewelyn Jones, 77)**

- Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.

<u>Response</u>

- Objectors drew attention to legitimate issues relating to allocation T29's ability to deliver the number of units set out in Policy TAI14 (the presence of a stream and trees on part of the site, and the site's topography and shape means that it is unlikely that the site will deliver 30 dwellings per hectare). On this premise the Unit has reviewed objections relating to amendments to the development boundary to determine whether minor amendments could be made to ensure sufficient flexibility within the Plan to deliver the Plan's strategy and objectives.

- No serious issues were raised about this site during the plan preparation process and forms a reasonable extension to the existing built form. Focussed Change NF118 amends the development boundary to include part the site to help towards achieving the indicative figure for the settlement.

ABERSOCH

a) Site Reference / Name:

- **SP830 - Land at Hendy Farm, Abersoch**
- **Rep ID: 1027 (Alex Badley, 255 c/o Asbri Planning, 1164)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.
c) What is the size of the site and what scale / numbers of units are proposed?	3.2 ha – Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 96 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement	No. Evidence shows that no allocation is required in the settlement as there is sufficient land bank provision and windfall opportunities to meet the settlement's housing needs. Therefore, it is considered

boundary and /or be allocated?	that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No. It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

a) <u>Site Reference / Name:</u>

- **Land at Lôn Garmon, Abersoch**
- **Rep ID: 1026 (Daniel Bufton, 321)**

QUESTION	COUNCILS' RESPONSE

b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.
c) What is the size of the site and what scale / numbers of units are proposed?	1.2ha – Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 36 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. No allocation is required in the settlement as there is sufficient land bank provision and windfall opportunities to meet the settlement's housing needs. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No. It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites.
g) Has the alternative allocation sought been considered in	A sustainability appraisal has been submitted by the objector in support of this proposal.

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?	As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

a) <u>Site Reference / Name:</u>

- **Land at Lôn Sarn Bach, Abersoch**
- **Rep ID: 953 (Emlyn Williams, 2153)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.
c) What is the size of the site and what scale / numbers of units are proposed?	0.3ha – Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 9 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. Development boundaries are drawn around the urban form of settlements. The site in question is not considered to be part of the Abersoch's urban form. No allocation is required in the settlement or amendments to the development boundary as there is sufficient land bank provision and windfall opportunities to meet the settlement's housing needs. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure	No. It is considered that the Plan meets the tests of soundness without the need for a different

that the LDP is sound?	approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites.
g) 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 has not been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

a) <u>Site Reference / Name:</u>

- **Land forming part of the Summer House, Abersoch**
- **Rep ID: 956 (Rod Thomson, 3125 c/o Peter Marston, 11)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Part of the site is included in the development boundary for Abersoch in the deposit plan. The other part of the site adjoins the boundary. The representor wishes to include the entire site within the development boundary for residential purposes. An additional property is also proposed to be included

	within the boundary.
c) What is the size of the site and what scale / numbers of units are proposed?	0.2ha – Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 6 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. Development boundaries are drawn around the urban form of settlements. The site in question is not considered to be part of the Abersoch's urban form. No allocation is required in the settlement or amendments to the development boundary as there is sufficient land bank provision and windfall opportunities to meet the settlement's housing needs. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No. It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites.
g) Has the alternative allocation sought been considered in respect of the Sustainability Appraisal / Strategic	A sustainability appraisal has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

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) Site Reference / Name:

- **Not site specific**
- **Rep ID: 1392 & 1393 (Councillor R.H. Wyn Williams, 367)**

- The representor believes the area shown on the map should be identified as a Commercial Area to promote work in the tourism industry and benefit the economy.

Response

- The Town Centre Map of Abersoch is based on the Retail Study (2013). Policy MAN 3: safeguards shops outside defined town centres unless it can be demonstrated that certain listed criteria can be met.

- No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.

a) Site Reference / Name:

- **Not site specific**
- **Rep ID: 1394 (Councillor R.H. Wyn Williams, 367)**

- The representor believes the area shown on the map should be identified as a location for services without any growth

Response

- Policy ISA2 recognises that in some instances the footprint of a proposed community facility can't be accommodated within the defined development boundary. It provides a degree of flexibility therefore to reasonably facilitate essential new community development. The

explanation to the Policy explains that proposals outside a settlement must demonstrate that the proposed location is the best available and is accessible to the local community.

- No change is required to address the objector's representation.

NEFYN

a) Site Reference / Name:

- **Land east of Y Fron, Nefyn**
- **Rep ID: 1040 (Lord Newborough, 3187 c/o Charlene Sussums-Lewis, Carter Jonas, 2829)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary and allocate for housing.
c) What is the size of the site and what scale / numbers of units are proposed?	0.4ha – 16 dwellings according to the representation
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. The Deposit Plan and its supporting documents, which includes an Urban Capacity Study (Topic Paper 6, PT.0013), clearly demonstrates that there is sufficient land allocated, windfall opportunities and a landbank provision within the Deposit Plan Development Boundary for Nefyn to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No, there is sufficient land allocated, windfall opportunities and a landbank provision for housing development within the Deposit Plan Development Boundary for Nefyn to meet the housing need identified in the Plan. Having considered the policy context, Plan strategy and other relevant material

	factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound. Therefore, It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

a) <u>Site Reference / Name:</u>

- **Land east of Y Fron, Nefyn**
- **Rep ID: 1041 (Lord Newborough, 3187 c/o Charlene Sussums-Lewis, Carter Jonas, 2829)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary and allocate for housing.
c) What is the size of the site and what scale / numbers of units are proposed?	0.4ha – 16 dwellings according to the representation
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. The Deposit Plan and its supporting documents, which includes an Urban Capacity Study (Topic Paper 6, PT.0013), clearly demonstrates that there is sufficient land allocated, windfall opportunities and a landbank provision within the Deposit Plan Development Boundary for Nefyn to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No, there is sufficient land allocated, windfall opportunities and a landbank provision for housing development within the Deposit Plan Development Boundary for Nefyn to meet the housing need identified in the Plan. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound. Therefore, It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.

ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

Y FFÔR

a) <u>Site Reference / Name:</u>

- **Not site specific**
- **Rep ID: 838, 1038, 1181 & 1344 (Cyngor Cymund Llannor, 1549)**

- The representor questions the growth figure of 40 dwellings for Y Ffôr. A planning application (C14/0999/40LL) was submitted after the deposit plan maps were created and if the application is successfull allocation T66 and T67 should be removed from the Plan.

<u>Response</u>

- The Councils are of the opinion that T67 & T68 are deliverable and that there are no insurmountable infrastructure or other constraints that would hinder the development of the site within the Plan period. Delivery of the site is not reliant on any strategic infrastructure and the Plan's policies set out how potential impacts of the development of the site can be managed.

- The delivery of housing will be monitored in the Annual Monitoring Reporting process using the data obtained through the Joint Housing Land Availability Studies. The monitoring framework will keep track of how many housing units are built per year and where.

a) <u>Site Reference / Name:</u>

- **C10, Land adjacent to the petrol station, Y Ffor**
- **Rep ID: 1285 (Cyngor Cymund Llannor, 1549)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	• C10 - Safeguarded employment allocation • 1.7ha • B1, B2& B8 uses • The representor wishes to limit the activity to light industrial use only.
c) What is the size of the site and what scale / numbers of units are proposed?	1.7ha
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the amendment of this site, it is for the representor to demonstrate that without the changes the site is not deliverable.
d) What are the anticipated timescales for delivery?	There are no known constraints to the development of the land as shown within the Deliverability of Sites Topic Paper (DA015).
dd) Should the site be included within the settlement boundary and /or be allocated?	Yes. The Employment Land Review (DC.003) recognised that there was a need for additional employment land the area. The land adjacent to the petrol Station satisfies the required need. Limiting the use of the proposed site to light industrial only wouldn't satisfy the need as recognised within the Employment Land Review.
e) Is the site necessary to ensure	Yes, the employment allocations and their use classes are supported by the Plan's evidence base. It is

that the LDP is sound?	considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to amend the status of the allocation in the Plan.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the amendment to this site this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan. The Employment Rand Review (DC.004) assessed the suitability of each employment site to assess the likelihood that the sites would be developed within the Plan period. Following the assessment of the sites suitability (based upon locational and infrastructure factors) the sites were divided into prime and secondary sites. The prime sites are those thought to be most attractive to the market and are more likely to be developed in the short term. Secondary sites may be in inferior locations in terms of access/market presence compared with prime sites but they retain an important role as they represent opportunities that are highly relevant to the Energy Island Programme or serve a local need in more remote or rural areas. Within the Employment Land Review land adjacent to Y Ffor Petrol Station has been recognised as a primary Employment Site.
g) Has the alternative allocation	As the Councils are not promoting the amendments to the site it is for the representor to demonstrate

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?	alignment with the SA/ SEA. This site is being supported by the Councils. All allocations have been assessed against the SA Framework found in the Sustainability Appraisal (Feb 2016) (CDLL.007).

a) <u>Site Reference / Name:</u>

- **SP682 - Land near the school, Y Ffôr**
- **Rep ID: 1037 (Lord Newborough, 3187, c/o Charlene Sussums-Lewis, Carter Jonas, 2829)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary and allocated for housing.
c) What is the size of the site and what scale / numbers of units are proposed?	0.6ha - Based on the JLDP guidelines of 18 dwellings per hectare the site could accommodate 6 dwellings
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included	No. The Deposit Plan and its supporting documents clearly demonstrates that there is sufficient land

within the settlement boundary and /or be allocated?	allocated, windfall opportunities and a landbank provision within the Deposit Plan Development Boundary for Y Ffôr to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No, there is sufficient land allocated, windfall opportunities and a landbank provision for housing development within the Deposit Plan Development Boundary for Y Ffôr to meet the housing need identified in the Plan. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound. Therefore, It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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	A sustainability appraisal has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

require re-assessment? If so, has such an assessment been carried out? What was the outcome of the process?	

CHWILOG

a) <u>Site Reference / Name:</u>

- **Land at rear of Brookside, Madryn Terrace, Chwilog**
- **Rep ID: 1023 (Daphne Marini, 326)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes and a parking area for the community.
c) What is the size of the site and what scale / numbers of units are proposed?	1.7ha - Based on the JLDP guidelines of 51 dwellings per hectare the site could accommodate 6 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. The Deposit Plan and its supporting documents clearly demonstrates that there is sufficient land allocated, windfall opportunities and a landbank provision within the Deposit Plan Development Boundary for Chwilog to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure	No, there is sufficient land allocated, windfall opportunities and a landbank provision for housing

that the LDP is sound?	development within the Deposit Plan Development Boundary for Chwilog to meet the housing need identified in the Plan. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound. Therefore, It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

MORFA NEFYN

a) Site Reference / Name:

- **Not site specific**
- **Rep ID: 461 (Tai Twnti Cyf, 2868; Mr P. Loyd, 2867)**

- The representor considers that identifying Morfa Nefyn as a rural/coastal village in the Deposit Plan where no allocations for open market housing are provided is considered unsound.

Response:

- Morfa Nefyn has been identified as a Coastal/Rural Village. The distribution strategy was established in the first place during the process of developing the Preferred Strategy of the Plan on the basis of evidence and public participation. In spatial terms the strategy is to ensure that the detailed and strategic policies of the Plan promote developments that address the expectations of the Vision and Strategic Objectives of the Plan. It would also ensure that the Council meets national expectations in promoting sustainable development. In this regard, PPW (Part 9.2) notes that the development plans need to provide a framework that will stimulate, guide and manage change towards a more sustainable pattern of development. Local planning authorities need to find a sustainable settlement network, which meets the requirements of the economy, the environment and health while respecting local diversity and protecting the character and cultural identity of the communities.

- The Deposit Plan identifies a Hierarchy of towns and villages with a specific role and function. A methodology has been developed and published to identify the settlements on the basis of their role, function, range and choice of facilities and services in Topic Paper 5 Developing the Settlement Strategy.

- The spatial strategy will ensure that development is directed to locations that are sustainable in terms of size, function, character, facilities, transport links, social and environmental inclusion. Therefore there will be a sustainable pattern of settlement with viable communities.

a) Site Reference / Name:

- **Land at Twnti, off B4412, Morfa Nefyn**
- **Rep ID: 465 (Tai Twnti Cyf, 2868 c/o Mr P. Lloyd, 2867)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	Greenfield site which lies outside the Deposit Plan development boundary. The representor wishes to include the site within the development boundary for residential purposes.
c) What is the size of the site and what scale / numbers of units are proposed?	The representor identifies two possible sites that would be suitable for housing with the total area of 0.9ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 27 dwellings.
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. It is considered that the Deposit Plan identifies sufficient, deliverable and appropriate housing land in the area and the proposed change is not considered required to ensure the soundness of the plan.
e) Is the site necessary to ensure that the LDP is sound?	No, it is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and

	contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

EFAILNEWYDD

a) Site Reference / Name:

- **Land at Penllwyn, Efailnewydd**
- **Rep ID: 966 (Dr B. Hughes-Parry, 3132 c/o Charlene Sussums-Lewis, Carter Jonas, 2829)**

QUESTION	COUNCILS' RESPONSE
b) What is the current status / use of the site and what is the proposed use?	The representor objects to the restriction of growth in Efailnewydd to 8 windfall dwellings and wishes to extend the development boundary to include land at Penllwyn to provide a site on the edge of the development boundary for residential development.
c) What is the size of the site and	The representor suggests that the site would be suitable for 6 dwellings.

what scale / numbers of units are proposed?	
ch) Are there any significant obstacles to the development of the site within the Plan period?	As the Councils are not promoting the site for inclusion in the Plan, it is for the representor to demonstrate that the site is ultimately deliverable.
d) What are the anticipated timescales for delivery?	As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.
dd) Should the site be included within the settlement boundary and /or be allocated?	No. The Deposit Plan and its supporting documents, clearly demonstrates that there is sufficient land bank and windfall opportunities for housing development within the Deposit Plan Development Boundary for Efailnewydd to meet the housing need identified in the Plan. Therefore, it is considered that there is no justification to include this land within the development boundary.
e) Is the site necessary to ensure that the LDP is sound?	No. It is considered that the Plan meets the tests of soundness without the need for a different approach or alternative sites to deliver the evidenced need. Having considered the policy context, Plan strategy and other relevant material factors, it is considered there is no demonstrable need to include the site in the Plan and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.
f) How would the alternative site contribute to the aims and strategic objectives of the Plan?	As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.
ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?	Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. As part of the earlier evidence gathering stages the Council invited interested parties to submit Candidate Sites to provide an indication of sites available for development. Details of the Candidate Sites submitted are contained in the Candidate Site Register (Doc Ref) The methodology for assessing the suitability of candidate sites can be found in Topic Paper 1 (PT.001) and contains a robust 3 step process to assess the suitability of the sites. The Joint Planning Policy Unit (JPPU) consulted on the methodology for assessing the Candidate Site between 18th August and 15th September 2011 which included engagement with statutory consultees and internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002). The site selection methodology clearly demonstrates the interrelationship between the candidate site

	assessment and SA appraisal of the options explored in the Deposit Plan.
g) 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 has been submitted by the objector in support of this proposal. As the Councils are not promoting the site for inclusion in the Plan it is for the representor to demonstrate alignment with the SA/ SEA.

LLANENGAN, SARN BACH & LLANGIAN

a) <u>Site Reference / Name:</u>

- **Not site specific**
- **Rep ID: 287 (Councillor John Brynmor Hughes, 2676)**

- The represenotor wishes to recategorise Llanengan and Sarn Bach as Clusters and Llangian as a Service Village.

<u>Response</u>

- Local planning authorities require a sustainable network of settlements, which satisfy economic needs, the environment and health whilst respecting local distinctiveness and safeguarding the cultural character and identity of communities. The Deposit Plan has identified a Hierarchy of towns and villages that have a specific role and function. The methodology was developed and published in Topic Paper 5 "Developing the Settlement Hierarchy" in order to identify settlements based on their role, function, range and choice of facilities and services.

- Llanengan and Sarn Bach don't meet the criteria to be classified as a Rural Villages and Llangian doesn't meet the criteria to be classified as a Service Village.

- The representor has not submitted any compelling evidence to justify the changes.