

Hearing Session 15

ALLOCATIONS AND ALTERNATIVE SITES: ANGLESEY - SOUTH

9.30 am, Tuesday 5 October 2016

Anglesey and Gwynedd Joint
Local Development Plan



CYNGOR SIR
YNYSS MON
ISLE OF ANGLESEY
COUNTY COUNCIL

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 Allocations and Alternative Sites in south Anglesey 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.

LLANGEFNI

a) **Site Reference / Name:**

- Land at Caeau Bodelis Fields, Llangefni (SP833)
- Rep ID: 1006 (Mr Alun Nicholls 3084)

| 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 seeks the allocation of a new site for housing development not included within the Deposit Plan. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 7.5ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 225 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, 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 Llangefni 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 Llangefni 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 |

| QUESTION | COUNCILS' RESPONSE |
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| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>alternative sites to deliver the evidenced need.</p> <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

a) **Site Reference / Name**

- Land to the north of Lledwigan Farm
- Rep ID: 1053 (Mark Newey, Llywodraeth Cymru, 1651)

| QUESTION | COUNCILS' RESPONSE |
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| <p>b) What is the current status / use of the site and what is the proposed use?</p> | <ul style="list-style-type: none"> • Safeguarded Employment Site under policy CYF1 of the Deposit Plan • Strategic Regional Employment Site • B1, B2 & B8 use • Greenfield site which lies outside the Deposit Plan development boundary. The representor objects to the potential loss of Best and Most Versatile (BMV) agricultural land, which could result in the permanent loss of high value agriculture land. |
| <p>c) What is the size of the site and what scale / numbers of units are proposed?</p> | <p>20.6ha</p> |
| <p>ch) Are there any significant obstacles to the development of the site within the Plan period?</p> | <p>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.</p> |
| <p>d) What are the anticipated timescales for delivery?</p> | <p>There are no known constraints to the development of the land as shown within the Deliverability of Sites Topic Paper (DA015). The site has been recognised by the Welsh Government as an Enterprise Zone designation leads to access of a suite of finance packages to kick start development along with support and incentive packages. As the Energy Island Programme and the requirement for associated developments progress it is likely that there will be greater demand for employment sites.</p> |
| <p>dd) Should the site be included within the settlement boundary and /or be allocated?</p> | <p>Yes. Robust evidence clearly demonstrate that there is a need for the employment land provision as a means of facilitating the transformational economic changes for Anglesey in relation to the Energy Island Programme.</p> <p>It is recognised that the site is Best and Most Versatile (BMV) agricultural land (grade 2) which was considered during the site assessment process. In accordance with Para 4.10 of Planning Policy Wales (Edition 8, 2016) BMV land should only be considered for development when there is an overriding need for the development and where land in lower grades are unavailable. Through the spatial strategy and site deliverability assessment process the Council has exhausted all other potential means to deliver the employment needs in Llangefni.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>e) Is the site necessary to ensure that the LDP is sound?</p> | <p>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. 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.</p> |
| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the amendment to this site this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> <p>The Employment Land 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 at Lledwigan, Llangefni has been recognised as a prime Employment Site.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>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?</p> | <p>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).</p> |

a) Site Reference / Name:

- Creamery Land, Llangejni
- Rep ID: 1054 [Mark Newey, Llywodraeth Cymru (1651)]

| QUESTION | COUNCILS' RESPONSE |
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| <p>b) What is the current status / use of the site and what is the proposed use?</p> | <ul style="list-style-type: none"> • Safeguarded Employment Site under policy CYF1 of the Deposit Plan • Strategic Regional Employment Site • B1, B2 & B8 use • Greenfield site which lies outside the Deposit Plan development boundary. The representor objects to the potential loss of Best and Most Versatile (BMV) agricultural land, which could result in the permanent loss of high value agriculture land. |
| <p>c) What is the size of the site and what scale / numbers of units are proposed?</p> | <p>4.9ha</p> |
| <p>ch) Are there any significant obstacles to the development of the site within the Plan period?</p> | <p>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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| 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). The site has been recognised by the Welsh Government as an Enterprise Zone designation leads to access of a suite of finance packages to kick start development along with support and incentive packages. As the Energy Island Programme and the requirement for associated developments progress it is likely that there will be greater demand for employment sites. |
| dd) Should the site be included within the settlement boundary and /or be allocated? | <p>Yes. Robust evidence clearly demonstrate that there is a need for the employment land provision as a means of facilitating the transformational economic changes for Anglesey in relation to the Energy Island Programme.</p> <p>It is recognised that the site is Best and Most Versatile (BMV) agricultural land (grade 3) which was considered during the site assessment process. In accordance with Para 4.10 of Planning Policy Wales (Edition 8, 2016) BMV land should only be considered for development when there is an overriding need for the development and where land in lower grades are unavailable. Through the spatial strategy and site deliverability assessment process the Council has exhausted all other potential means to deliver the employment needs in Llangefni.</p> |
| 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. 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? | <p>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 (CDLI.002) 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.</p> <p>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</p> |

| QUESTION | COUNCILS' RESPONSE |
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| | <p>internal Council departments. The summary of the main issues raised and Councils' response can be found in Topic Paper 1A (PT.002).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> <p>The Employment Land 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 at Cremery, Llangefni has been recognised as a prime Employment Site.</p> |
| <p>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?</p> | <p>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).</p> |

a) Site Reference / Name:

- Dafarn Newydd site, Llangefni
- Rep ID: 1402 [Bob Parry & Co Ltd (3342) c/o Owen Davenport (2755)]

| QUESTION | COUNCILS' RESPONSE |
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| b) What is the current status / use of the site and what is the proposed use? | Greenfield site which is lies outside the Deposit Plan development boundary. The representor wishes to include the site as an alternative to the Lledwigan Farm site. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 14.16ha – employment land |
| 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? | <p>No. The Employment Land Survey identifies the need for a main employment site in Llangefni. Other potential options and locations were assessed, however, it was concluded that the Lledwigan Farm site along with the Creamery site was more suitable due to its accessibility to the A55.</p> <p>Allocating the site is in keeping with the Plan's classification strategy, as Llangefni is identified as a service Centre. Furthermore, it is noted that the site has been identified as an enterprise zone by the Welsh Government, in an attempt to realise the Energy Island Programme's objectives. The Enterprise Zone allocation is a sign of national and local commitment to develop the site for employment purposes.</p> |
| e) Is the site necessary to ensure that the LDP is sound? | No, there is sufficient land allocated for employment purposes within the Deposit Plan. 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. |

| QUESTION | COUNCILS' RESPONSE |
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| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>Yes. The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. The Joint Planning Policy Unit commissioned URS Scott Wilson to undertake an Employment Land Review (DC.004) as a means of providing robust evidence to underpin and inform the supply and demand for employment land and premises within the Local Development Plan. The scope and structure of the Employment Land Study is in line with the recommendations of the guidance commissioned by the Office of the Deputy prime Minister (ODPM) ' Employment Land Reviews: Guidance Note' (2004). The study is based upon a three stage assessment process, firstly, taking stock of the current situation, secondly, assessing the future requirements and thirdly, identifying a new portfolio of sites.</p> <p>Further justification regarding the employment land provision within the Plan is given within the 'Employment Land Allocations in the Emerging JLDP' Explanatory Note prepared by Amec Foster Wheeler (DA.016).</p> <p>The Employment Land 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 Bryn Cegin has been recognised as a prime Employment Site</p> |
| <p>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</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| the outcome of the process? | |

a) **Site Reference / Name:**

- Land at Gwernhefin, Llangefni
- Rep ID: 1005 (Rhian Williams, 2303)

| QUESTION | COUNCILS' RESPONSE |
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| 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 land within the development boundary and allocate for housing. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 4.55ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 137 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, 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 Llangefni 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. The land in question is in a prominent, elevated position compared to the deposit housing allocations in Llangefni. |
| 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 Llangefni 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 |

| QUESTION | COUNCILS' RESPONSE |
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| | 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? | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| 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? | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| 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 proposes an extension to the allocated site (T20) land adjacent to Tyn Coed to be included within the development boundary for allocation of housing to ensure that the level of housing is maintained over the plan period. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 1.16ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 48 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, 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 Llangefni 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 Llangefni 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. |

| QUESTION | COUNCILS' RESPONSE |
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| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

GENERAL COMMENTS

- a) Site Reference / Name:
- Not site specific

- **Rep ID: 83 [Prof TW Ashden, Cyngor Tref Biwmares (1267)]**
- The representor wishes that some of the allocated housing sites in Holyhead, Llangefni and Amlwch and Bangor should be redirected to the settlements of Llanfairpwllgwyngyll, Menai Bridge, Llandegfan and Beaumaris.

Response:

- Not accepted - 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.
- Distributing less growth to the main centres and directing more to smaller centres or villages or clusters without a compelling reason to do so would undermine the Spatial Strategy and the sustainability principles underpinning the Plan.
- There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.

BEAUMARIS/LLANFAES

a) Site Reference / Name:

- **Not site specific**
- **Rep ID: 102 [Prof TW Ashden, Cyngor Tref Biwmares (1267)]**
- The representor wishes that a greater allocation of housing should be made to the Beaumaris/Llanfaes area

Response:

- Not accepted - topic paper 5 'Developing the Settlement Strategy' outlines the methodology to identify the role of different settlements and spatial distribution of housing growth level within the Plan.
- Beaumaris is identified as a Local Service Centre and its growth level reflects this.
- Due to the nature of the services and facilities in Holyhead, Llangefni and Amlwch, they have been identified as Urban Service Centres and their growth level reflects this role and the fact that policy PS15 distributes 55% of the Plan's growth to the Sub-Regional Centre / Urban Service Centres.
- The objector has not included any evidence which undermines the methodology used by the Councils to identify the role of the settlements or the way in which the growth figures have been distributed.
- There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.

Site Reference / Name:

- **Not site specific**
- **Rep ID: 536 [Prof TW Ashden, Cyngor Tref Biwmares (1267)]**
- The representor wishes that Beaumaris Town Centre should be marked correctly and identified in the Deposit Plan to properly represent the actual town centre area of the town.

Response:

- The Town Centre Map of Beaumaris 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.

Site Reference / Name:

- **Protected Open Space and Play Area, Happy Valley, Biwmaris**
- **Rep ID: 537 [Prof TW Ashden, Cyngor Tref Biwmares (1267)]**

- The representor wishes to designate the bowling green as a Protected Open Space

Response:

- The Councils agree to the objection and is reflected in Focussed Change NF120

GAERWEN

a) Site Reference / Name:

- Land adjoining Gaerwen Uchaf Business Park, Gaerwen
- Rep ID: 1124 [Christene Webber (3236) c/o Cadnant Planning (1366)]

| QUESTION | COUNCILS' RESPONSE |
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| b) What is the current status / use of the site and what is the proposed use? | Greenfield site which is lies outside the Deposit Plan development boundary. The representor wishes to propose that the site is included within the development boundary and allocated for mixed use development comprising of housing, public open space, community facilities development within the settlement. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 7.13ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 214 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. Evidence clearly demonstrates that no allocation is required in the settlement as there is sufficient land bank 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 |

| QUESTION | COUNCILS' RESPONSE |
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| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>and the inclusion of the alternative site is not considered necessary to ensure that Plan LDP is sound.</p> <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

LLANFAIRPWLL

a) **Site Reference / Name:**

- Land adjacent to Bryn Eira, Llanfairpwll
- Rep ID: 1388 [Mr & Mrs Brooke (3081) c/o Cadnant Planning (1366)]

| QUESTION | COUNCILS' RESPONSE |
|---|---|
| b) What is the current status / use of the site and what is the proposed use? | Greenfield site which is lies outside the Deposit Plan development boundary. The representor wishes to propose an extension to the allocated site on land adjacent to Bryn Eira for housing. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 3.2ha - 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 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 Llanfair 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 Llanfair 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. |

| QUESTION | COUNCILS' RESPONSE |
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| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

MENAI BRIDGE

a) **Site Reference / Name:**

- Land opp Tafarn Four Crosses, Menai Bridge
- Rep ID: 1157 [Cadnant Planning (1366)]

| 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 propose the site to the north-west of the Four Crosses Roundabout to be included within the development boundary of Menai Bridge for the allocation of mixed use development. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 3.81ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 114 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, 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 Menai Bridge 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 Menai Bridge 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. |

| QUESTION | COUNCILS' RESPONSE |
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| | <p>The Council's site selection process is considered reasonable and appropriate and founded on a robust and credible evidence base. With regard to employment use on site, the Joint Planning Policy Unit commissioned URS Scott Wilson to undertake an Employment Land Review as a means of providing robust evidence to underpin and inform the supply and demand for employment land and premises within the Local Development Plan. The scope and structure of the Employment Land Study is in line with the recommendations of the guidance commissioned by the Office of the Deputy prime Minister (ODPM) 'Employment Land Reviews: Guidance Note' (2004). The study is based upon a three stage assessment process, firstly, taking stock of the current situation, secondly, assessing the future requirements and thirdly, identifying a new portfolio of sites.</p> <p>Further justification regarding the employment land provision within the Plan is given within the 'Employment Land Allocations in the Emerging JLDP' Explanatory Note prepared by Amec Foster Wheeler.</p> |
| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>g) Has the alternative</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>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?</p> | <p>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.</p> |

PENTRAETH

a) **Site Reference / Name:**

- Meithrinfa Pentraeth Nursery, Pentraeth (SP612)
- Rep ID: 1159 [Cadnant Planning (1366)]

| QUESTION | COUNCILS' RESPONSE |
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| <p>b) What is the current status / use of the site and what is the proposed use?</p> | <p>Previously developed site which is lies outside the Deposit Plan development boundary. The representor wishes to propose a brownfield site at Pentraeth Nursery to be included within the development plan and allocated for housing.</p> |
| <p>c) What is the size of the site and what scale / numbers of units are proposed?</p> | <p>0.67ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 20 dwellings.</p> |
| <p>ch) Are there any significant obstacles to the development of the site within the Plan period?</p> | <p>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.</p> |
| <p>d) What are the anticipated timescales for delivery?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>dd) Should the site be included within the settlement boundary and /or be allocated?</p> | <p>No. Evidence clearly demonstrates no allocation is required in the settlement as there is sufficient land bank 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.</p> |
| <p>e) Is the site necessary to ensure that the LDP is sound?</p> | <p>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.</p> |
| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>g) Has the alternative allocation sought been considered in respect of the Sustainability Appraisal / Strategic Environmental</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>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?</p> | |

a) **Site Reference / Name:**

- Land at Glanrafon, Pentraeth
- Rep ID: 1160 [Cadnant Planning (1366)]

| QUESTION | COUNCILS' RESPONSE |
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| <p>b) What is the current status / use of the site and what is the proposed use?</p> | <p>Greenfield site which is lies outside the Deposit Plan development boundary. The representor wishes to propose the Glanrafon site for inclusion in the development boundary and allocated for housing..</p> |
| <p>c) What is the size of the site and what scale / numbers of units are proposed?</p> | <p>3.1 ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 93 dwellings.</p> |
| <p>ch) Are there any significant obstacles to the development of the site within the Plan period?</p> | <p>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.</p> |
| <p>d) What are the anticipated timescales for delivery?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.</p> |
| <p>dd) Should the site be included within the settlement boundary and /or be allocated?</p> | <p>No. Evidence clearly demonstrates no allocation is required in the settlement as there is sufficient land bank 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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| <p>e) Is the site necessary to ensure that the LDP is sound?</p> | <p>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.</p> |
| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

| QUESTION | COUNCILS' RESPONSE |
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| been carried out? What was the outcome of the process? | |

LLANDEGFAN

a) **Site Reference / Name:**

- Site adjacent to Gwel y Llan Estate, Llandegfan (SP660)
- Rep ID: 1797 [Mrs Davidson (3359) c/o Cadnant Planning (1366)]

| 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 see the site included within the development boundary of Llandegfan and allocated for housing. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 1.04 ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 31 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 |

| QUESTION | COUNCILS' RESPONSE |
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| | 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? | <p>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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| 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? | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

LLANDDANIEL FAB

a) **Site Reference / Name:**

- Safle yr Hen Ficerdy, Llanddaniel Fab (SP719)
- Rep ID: 967 [Carolyn Watkyn (2216)]

| QUESTION | COUNCILS' RESPONSE |
|--|---|
| b) What is the current status / use of the site and what is the proposed use? | Greenfield site which is 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? | 0.58 ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 17 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 | Yes. The Councils' site selection process is considered reasonable and appropriate and founded on a |

| QUESTION | COUNCILS' RESPONSE |
|---|--|
| <p>selection process reasonable and appropriate and is it founded on a robust and credible evidence base?</p> | <p>robust and credible evidence base. As part of the earlier evidence gathering stages the Councils' 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 (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>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.</p> |

BRYNSIENCYN

a) Site Reference / Name:

- **Field bounded by properties in Lôn Uchaf and Ty'n y Bryn, Brynsiencyn**
- **Rep ID: 386 [Rosamund James (2726)]**

| QUESTION | COUNCILS' RESPONSE |
|---|---|
| b) What is the current status / use of the site and what is the proposed use? | Greenfield site which lies within the development boundary of Brynsiencyn. The representor is objecting to the proposed inclusion of the field within the boundary and suggests other, more suitable sites exist in the village. |
| c) What is the size of the site and what scale / numbers of units are proposed? | 0.4ha - Based on the JLDP guidelines of 30 dwellings per hectare the site could accommodate 12 dwellings. |
| ch) Are there any significant obstacles to the development of the site within the Plan period? | No. Development boundaries have been drawn around villages to ensure sufficient opportunities exist for settlements within the plan. The suitability or otherwise of parcels of land for a number of different uses within a development boundary will be considered at the planning application stage. |
| d) What are the anticipated timescales for delivery? | n/a |
| dd) Should the site be included within the settlement boundary and /or be allocated? | <p>Yes. Development boundaries have been drawn around villages to ensure sufficient opportunities exist for settlements within the plan. The suitability or otherwise of parcels of land within a development boundary will be considered at the planning application stage.</p> <p>Land at Merddyn Gwyn has had the benefit of planning permission for a number of years but has not been developed to date. In the 2014 Joint Housing Land Availability Study this site was outside the 5 year land supply due to the length of time it has had permission. In fact Table 3 in Appendix 5 of the Deposit Plan identifies a number of units from the land bank which are unlikely to be completed and the 13 for Brynsiencyn are the Merddyn Gwyn site.</p> <p>The Highways Dept has not objected to the settlement's development boundary</p> |
| e) Is the site necessary to ensure that the LDP is sound? | Yes. Development boundaries have been drawn around villages to ensure sufficient opportunities exist for settlements within the plan. The suitability or otherwise of parcels of land within a development boundary will be considered at the planning application stage. |
| f) How would the alternative site contribute to the aims and strategic objectives of the Plan? | Development boundaries have been drawn around villages to ensure sufficient opportunities exist for settlements within the plan. The suitability or otherwise of parcels of land within a development boundary will be considered at the planning application stage. |

| QUESTION | COUNCILS' RESPONSE |
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| ff) Is the Council's site selection process reasonable and appropriate and is it founded on a robust and credible evidence base? | <p>Not applicable as this objection does not relate to an allocation.</p> |
| 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? | <p>Not applicable as this objection does not relate to an allocation.</p> |

Site Reference / Name:

- Not site Specific
- Rep ID: 1399 [DP Jones (2063)]
- The representor wishes that Llanddaniel North East should be identified as a Cluster

Response:

- Topic Paper 5 'Developing the Settlement Strategy' outlines the methodology used to identify the role of different centres within the Plan area.
- To be identified as a Cluster, there must be a cohesive group of 10 or more houses, with an operational link to a higher level centre based on its location on a bus route with a bus stop, or within 800 meters of a bus stop.

- While we accept that Policy TAI 18 identifies a mix of various types of clusters, they all either have 10 or more houses on one side of a road, or form a cohesive group with houses opposite each other. In this case there are 8 houses on one side of the road, then a small gap before three houses on the other side, and none of the houses are directly opposite each other. Therefore it is not considered that there is a cohesive group in this area.
 - There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.

LLANFAES

a) Site Reference / Name:

- **Former Lairds Site, Llanfaes**
- **Rep ID: 932 (Excelsior Properties, 3317 c/o Cadnant Planning,1366)**

| QUESTION | COUNCILS' RESPONSE |
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| b) What is the current status / use of the site and what is the proposed use? | <p>Previously developed site, adjoining the settlement of Llanfaes, which has been recognised as Cluster in the Plan's Settlement Hierarchy and under Policy TAI 18 of the Deposit Plan.</p> <p>The representor objects to the exclusion of the Former Lairds Site from the allocated sites included in the Deposit Plan and seeks its allocation for mixed use development, comprising of potential space for a primary school, residential use, industrial use and tourism use.</p> |
| c) What is the size of the site and what scale / numbers of units are proposed? | <p>The site covers 15 hectares. Most of the site is categorised as brownfield land. Allowance for a woodland, which is subject to a Tree Preservation Order reduces the potential development area to around 13 hectares. No housing figure is provided by the objector in his submission. The objector refers to the provision of high density, medium density and low density housing. Applying the standard 30 units per hectare could yield 390 housing units. Allowing around 3 hectares for a primary school would leave 10 hectares, which could equate to around 300 housing units. An indicative plan provided by the objector indicates a potential footprint for the residential element of the anticipated mixed use development. It is understood that the objector has indicated that he is seeking to relocate the Deposit Plan's provision for housing to the objection site, which would equate to 35 housing units.</p> |
| ch) Are there any significant obstacles to the development of the site within the Plan period? | <p>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.</p> <p>However, the previous use of the site suggests that there may be on site contamination issues, which could</p> |

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| | <p>affect the site viability. No evidence on the potential contamination issue has been provided by the objector and how that would affect the site's deliverability within the Plan period has been provided.</p> <p>The main access road (B5109) falls within a C2 flood risk zone where there are known flooding events. There are also known flooding events on the alternative routes to the site which could impact access to the site during a flood event.</p> <p>The site is located in the AONB. Paragraph 5.5.6 of Planning Policy Wales (8th Ed, Jan 2016) states that "Major developments should not take place in National Parks or AONBs except in exceptional circumstances. This may arise where, after rigorous examination, there is demonstrated to be an overriding public need and refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way ". No evidence of need, benefits to the local economy or alternative locations has been provided by the objector. The Plan's Spatial Strategy guides significant development away from Clusters on the basis that other more sustainable locations are available, particularly in terms of residential use.</p> |
| <p>d) What are the anticipated timescales for delivery?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan, this is for the representor to demonstrate.</p> |
| <p>dd) Should the site be included within the settlement boundary and /or be allocated?</p> | <p>No. The site is located near a Cluster, which is the lowest order settlement in the Plan's Settlement Hierarchy. The Plan seeks to carefully manage development in Clusters and in the countryside, seeking a proportionate level of growth, particularly in terms of residential use. Manage.</p> <p>The proposal is considered to be speculative in nature. Although the objector has submitted a plan that seems to identify different use zones this approach isn't substantiated / informed by evidence to demonstrate each potential use's deliverability.</p> <p>The site's location adjacent to a Cluster and, in planning policy terms, in the countryside does not preclude suitable development, but having particular regard to the site's location within an AONB. The following paragraphs clearly demonstrate that the Plan could facilitate various types of development on site, subject to conformity with relevant policies and material planning considerations, without an allocation in the Plan.</p> <ul style="list-style-type: none"> • Mixed Use: Objector considers that the Plan should deal with the site as a strategic site, which could accommodate |

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| | <p>a <u>potential</u> array of uses. The proposal is considered to be speculative in nature but with clear emphasis on residential use. Although a plan showing different use zone has been provided this is not considered to be a masterplan. No development appraisal submitted to determine viability and therefore deliverability of site within the Plan period. Notwithstanding this concern about the lack of evidence to support assertions made in the objection, it is also considered that all elements of a mixed use should conform to the Plan's Strategy. In this case, all the elements do not conform with the Plan's Strategy to the extent that the Council considers that the proposal would undermine the soundness of the Plan</p> <ul style="list-style-type: none"> • Brownfield Site: Policy PS5: Sustainable development – promotes re-use of previously developed land wherever possible within development boundaries of the identified Centres and Villages, or in appropriate places outside them in accordance with Policy PS15. There is therefore a specific policy that deals with brownfield sites and specific allocation is not justified. • Location: On edge of part of Llanfaes, 1.5km to the east of Beaumaris. Part of direct vehicular access from Beaumaris to Llanfaes is along a road that is in a C2 zone, where there are known flooding events. • Commercial/Employment Use: The Employment Land Review, which is an important source of evidence to underpin policies in the Plan to facilitate employment use discounted the site as a potential employment allocation on the basis of accessibility to the primary road network, highly isolated from all forms of non-car modes, in comparison with other sites on the Island. Nonetheless, Policy CYF 5 in principle supports new build units for business or industrial use in rural communities provided scale and nature of use is compatible with the location. Therefore, there is no requirement to allocate the site for this use as there is a criteria based policy that could facilitate this type of use on the site. • <u>Visitor Economy:</u> The Plan does not allocate land for tourism accommodation or visitor attractions. Instead it includes a series of criteria based policies. Policy TWR 1 in principle supports new visitor attractions and facilities involving the re-use of suitable previously developed land, subject to location, high quality design, |

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| | <p>layout etc., providing local employment opportunities; Policy TWR 2 in principle supports new serviced or self-serviced holiday accommodation on previously developed land or by using existing buildings. Policy TWR 5 in principle supports new touring caravan, camping and temporary alternative camping accommodation. There is however no policy support for new static, chalet or permanent alternative camping accommodation for sites located in the AONB. Therefore, there are policies that could facilitate suitable visitor related development on this site and therefore there is no requirement for allocation for this type of use.</p> <ul style="list-style-type: none"> <p>• <u>Primary School:</u> The site is within a sub-area identified within the Council's School Modernisation Programme. The required process to look for alternative options/ sites and public consultation has not been undertaken. Therefore, there is no basis to include a proposal that would in essence allocate part of the site in the Deposit Plan for a school. Whilst the Council may include the site in its optioneering process allocating the site on the premise that it could deliver a new school at some future point in time would be inappropriate as the Plan's policies and proposals need to be based on an evidence based assessment showing clearly what type of use is being promoted. There is a risk that complying with the objector's proposal could be perceived as predetermining a process yet to be undertaken by the Council.</p> <p>Nonetheless, should the requisite process in due course reveal that the site provides the most appropriate option to locate a new school, Policy ISA2, in principle, supports the development of new schools in Clusters, provided that other options have been explored and discounted. Therefore, subject to various requirements there is a policy that could facilitate a school on this site without any need to allocate.</p> <p>• <u>Housing:</u></p> <ol style="list-style-type: none"> <p>1. <u>Housing Requirement</u> The objector questions the Plan's overall housing requirement. No robust evidence has been submitted by the objector to counter the Councils' evidence set out in various supporting documents that demonstrate the requirement for the level of growth set out in Policy PS 13. On this basis, a proposed change to the housing requirement would therefore undermine the Plan's Growth Strategy and would be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>2. <u>Over-Reliance on windfall</u></p> |

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| | <p>No robust evidence submitted to counter the methodology and evidence submitted in Topic Paper 6 Urban Capacity Study to justify a change. No robust evidence has been submitted to substantiate assertion that the site that benefits from extant planning permission would not deliver housing units within the Plan period. On this basis, a proposed change would therefore undermine the Plan's Spatial Strategy and would therefore be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>3. <u>Housing in Llanfaes</u> The sites covers 15 hectares. Allowance for a woodland, which is subject to a Tree Preservation Order reduces the potential development area to around 13 hectares. The objector refers to the provision of high density, medium density and low density housing. Applying the standard 30 units per hectare could yield 390 housing units. Allowing around 3 hectares for a primary school would leave 10 hectares, which could equate to around 300 housing units. The objector has submitted a zoning plan that shows a potential area for housing on the site, which would equate to a lower level. Nonetheless the zoning plan is unsubstantiated and as referred to previously the objector has not demonstrated that Beaumaris could not accommodate the indicative level of growth or how the proposal accords with the Plan's Spatial Strategy. The Plan's Spatial Strategy manages new housing development in Clusters to deliver local need affordable housing (which accords with TAN 6). Policy TAI 18 provides for 2 local need affordable housing on suitable sites within or adjoining existing buildings in Clusters.</p> <p>No robust evidence has been submitted to counter the evidence set out in various Topic Papers, which underpin the Plan, to justify a change. A proposed change on this basis would undermine the Plan's Spatial and therefore the Housing Strategy and would be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>4. <u>Type of Housing: Local Market Housing</u> Llanfaes lies within a ward where the local market housing policy would apply (TAI 15) which the objector is seeking to deviate from in relation to this site. No robust evidence has been submitted to counter the evidence submitted in Topic Paper 17, which forms the basis for Policy TAI 5. On this basis a proposed change would undermine the Plan's Housing Strategy and would be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>5. <u>Type of Housing: Extra Care</u></p> |

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| | <p>In terms of an extra care housing scheme, the Council is currently exploring different options to deliver an alternative provision in this sub area. Again, it would clearly be inappropriate for the Plan to pre-determine the results of this work. Policy TAI 4 facilitates the provision of new residential care homes, extra care housing or specialist care accommodation for the elderly primarily on sites within the identified Centres in the Settlement Hierarchy, or suitable sites outside the Centres provided that the use falls within Use Class C2. Uses that fall within Use Class C3 would have to be considered against Policy TAI 18.</p> <p>Additionally the Inspector that examined Anglesey's stopped UDP Inspector considered an objection to the Plan in respect of a proposal to allocate the site for residential use. He recommended that the site not be allocated for housing because "the proposed substantial amount of housing land on the site would result in effect in the creation of a new settlement.... as this settlement would have few community facilities, it would not constitute sustainable development since residents would need to travel elsewhere for many of their everyday needs. Although bus services pass the site, they are not frequent. It is likely therefore that many of these journeys would be made by private car. Any development of a new village on this site could only be justified if all other more sustainable options on the island had been allocated first. There is no evidence before me however that this site has formed part of a systematic identification of housing sites in accordance with an island-wide sequential approach."</p> |
| <p>e) Is the site necessary to ensure that the LDP is sound?</p> | <p>No. There is no compelling evidence to justify amending the Deposit Plan to allocate this site for a mixed use that includes housing. Such a change is considered to be a fundamental change that would go to the heart of the Plan, undermining the soundness of the Plan. The Plan could, with the provision of relevant evidence, facilitate the other uses put forward (except for a significant amount of housing) without allocating the site.</p> <p>Including this site within the development boundary with no clear / substantiated commitment to deliver the potential policy compliant uses on the site could lead to a substantial number of houses which would be over and above what accords with the Policy and the Strategy set out in the Plan. On the basis that Policy TAI 5 promotes local market housing in the ward that includes Beaumaris and Llanfaes, and the concern about the number of potential housing units, the proposal would clearly undermine the Plan's Growth and Spatial and therefore the Housing Strategy. This is considered be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>Having considered the policy context, Plan strategy and other relevant material factors, it is considered</p> |

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| | <p>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 is sound.</p> |
| <p>f) How would the alternative site contribute to the aims and strategic objectives of the Plan?</p> | <p>As the Councils are not promoting the site for inclusion in the Plan this is for the representor to demonstrate.</p> <p>The Plan's Spatial Strategy manages new housing development in Clusters to deliver local need affordable housing (which accords with TAN 6). Policy TAI 18 provides for 2 local need affordable housing on suitable sites within or adjoining existing buildings in Clusters.</p> <p>No robust evidence has been submitted to counter the evidence set out in Topic Papers and Background documents, which underpin the Plan, to justify a change. A proposed change on this basis would undermine the Plan's Spatial and therefore the Housing Strategy and would be a fundamental change to the Plan to the extent that it would not meet the soundness tests.</p> <p>The proposed amendment sought by the objector is at odds with the Plan's Spatial Strategy. Llanfaes is categorised as a 'Cluster' in the Plan's Settlement Hierarchy. The Plan's Strategy (Chapter 6) proposes "some development in Clusters, identified because of their functional links with Villages or Centres, and in the countryside". In housing terms, 25% of the Plan's overall housing is directed to villages, clusters and the countryside. This then equates to 2 affordable housing units to each Cluster (Policy TAI 18). The Plan's distribution strategy was agreed at the Pre-Deposit stage and then at the Deposit Stage. It has been informed by the Sustainability Appraisal, which in turn has been informed by the Welsh Language Impact Assessment.</p> <p>No housing figure is provided by the objector in his submission. In trying to clarify this position the objector has indicated that the proposed housing zone could equate to between 55 – 90 housing units. This clearly would be in excess of the number of units being facilitated by the Strategy and the Policy that deals with Clusters. The indicative figure referred to by the objector is based on diversion of housing units currently identified for Beaumaris to the proposed site on the basis that the settlement will not be able to accommodate this level of growth. The objector hasn't been able to demonstrate that there is no capacity within Beaumaris for the indicative level of growth.</p> |
| <p>ff) Is the Council's site selection process reasonable and appropriate</p> | <p>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.</p> |

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| <p>and is it founded on a robust and credible evidence base?</p> | <p>Details of the Candidate Sites submitted are contained in the Candidate Site Register (CDLI.002) 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.</p> <p>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).</p> <p>The site selection methodology clearly demonstrates the interrelationship between the candidate site assessment and SA appraisal of the options explored in the Deposit Plan.</p> |
| <p>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?</p> | <p>A sustainability appraisal has been submitted by the objector in support of this proposal.</p> <p>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.</p> |

PENMYNYDD

a) Site Reference / Name:

- Not site specific
- Rep ID: 1291 [Rhys Davies Cyngor Cymuned Penmynydd a Star (3295)]

- The representor wishes...

Response:

- Topic Paper 5 'Developing the Settlement Strategy' outlines the methodology used to identify the role of different centres within the Plan area.
- To be identified as a Cluster, there must be a cohesive group of 10 or more houses, with an operational link to a higher level centre based on its location on a bus route with a bus stop, or within 800 meters of a bus stop.
- The objector has not submitted a map to identify a cohesive group within the area. The Council is not of the view that there is a cohesive group of 10 or more houses in the area which the objector wishes to be included in the Plan.
- There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.