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6 May 2016

Ms N H Davies
Joint Planning Policy Manager
Joint Planning Policy Unit
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Bangor
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Dear Ms Davies,

**Anglesey and Gwynedd Joint Local Development Plan 2011-2026
Examination - Inspectors' Preliminary Note to the Councils**

As you will appreciate we are currently reading the documents that form part of your Councils' formal submission of the JLDP for Examination. Based on an initial assessment there are certain matters that arise which I consider would be useful to raise with you at this early stage. Not only will the requested information assist in our preparatory work but it offers an early opportunity for you to undertake additional work to avoid delaying later stages of the examination. As we continue with our preparation there may be other matters that will be raised in advance of the hearing sessions.

1. Sustainability Appraisal, March 2016

This document contains, at Appendix 8, an SA of the strategic policies of the Plan. However, there are differences in the detailed content of the policies (as well as the order in which they are presented and numbered) between the version set out in the SA and that which appears in the Deposit Plan. Not all the policies identified in the SA have been incorporated in the Deposit Plan. The SA of certain strategic policies includes reference to the role that would be played by more detailed policies of the Plan in ensuring the mitigation of potentially harmful impacts. However, there is no detailed SA of individual policies of the Plan. I would be grateful to receive your comments. In particular you should explain the differences between the strategic policies assessed in the SA and those that appear in the submitted plan and comment on the apparent absence of an SA of the detailed policies. It may be that further information has been prepared which is relevant to these matters, if so I would be grateful if you would direct me to these. If you consider that the SA is adequate without any further assessment I would be grateful to receive your explanation in order that I may consider the matter further. If on considering the points I

have raised you wish to update the SA you should explain the extent of the work that you propose to undertake together with a timetable for its presentation to the Examination.

2. Housing Supply

The preparation of a housing trajectory is to be welcomed. However, from my reading of Topic Paper (TP) 20 I consider that the issue of housing supply including its trajectory would benefit from further clarification. Indeed, there appears to be inconsistencies in some of the figures contained in this Topic Paper compared to that set out in the Plan (including Focussed Changes). There may be simple explanations but I suggest that a further Paper is produced to elaborate and, if necessary, alter the content of the submitted Paper and/or suggest changes to the Plan to reflect the latest evidence. The introduction of cross-references to other sources of information may be helpful. At this initial stage I am seeking only to clarify certain details rather than commenting on any matters that deal with the merits of the approach (which will of course be the subject of examination at a hearing session). At this stage I do not propose to identify all the matters that have caught my attention but in an Annex to this letter I raise several specific matters which I hope will assist you in providing the additional information and explanation.

3. Affordable Housing

Has there been an assessment of where, in terms of the settlement hierarchy, the areas of greatest need of affordable housing are located? Clarification should be provided of the percentage of affordable housing anticipated from windfall sites compared with allocated sites. An explanation would be helpful on the Plan's approach in TAI9 to setting the target rate of contribution for affordable housing at 2 levels, particularly in the light of the 2014 update of the Viability Study which suggested a refinement beyond the option of 3 levels of target contribution that was suggested in the original, 2013, report.

Given the importance placed by national policy on delivering affordable housing a Hearing session will explore whether the Plan is maximising delivery, recognising that the demand cannot be met in full through the Plan. Given the consultant's findings identified the degree to which the local housing market can affect viability, a further update would be helpful given that almost 2 years will have passed by the time this is discussed. It will also provide an opportunity to consider the effects of the introduction in January of this year of the requirement for sprinklers in all new homes which is identified by the consultant as a potentially significant issue.

4. Gypsy and traveller sites

I note the content of Topic Paper 18A, in particular that both Councils anticipate that they will be in a position to present their preferred sites by the end of May. This information should be presented to the Programme Officer by 7 June. This will enable any further clarification that I may require to be sought at the Pre-Hearing Meeting.

5. Employment

An explanation should be provided of: the reason for the extent of the overprovision of employment land; any assessment of the implications arising from the degree to which such land is safeguarded; and an explanation of why the Plan differentiates between vacant land within safeguarded sites and new allocations. To assist in understanding the distribution of employment land a further breakdown of the figures set out in CYF1 should be provided. In addition to providing figures for the total and vacant areas it should also include figures for the primary and the secondary sites and provide overall totals for each, as well as sub totals for each tier of the hierarchy.

6. Renewable Energy

NF 33 makes reference to additional work commissioned by the Councils in response to the Welsh Government's updated 'Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners'. I would be grateful to receive information on the scope of this work, progress to date and the deadline by which the document would be available for presentation to the examination.

7. Additional Documents

The following documents should also be added to the Examination Library: the 2013 North Wales Gypsy and Traveller Accommodation Needs Assessment; the 2016 Anglesey and Gwynedd Gypsy and Travellers Accommodation Needs Assessment; Welsh Government's Gypsy and Traveller Count, January 2013-July 2015; and the latest Local Housing Market Assessments.

8. Supplementary Planning Guidance

The Plan proposes a series of SPGs to underpin the Plan's effectiveness. A timetable for the production and adoption of all envisaged SPGs should be provided, together with a summary of the envisaged content of each and an explanation of the implications to the Plan's effectiveness for any period that may arise between the adoption of the Plan and the SPGs' adoption.

9. Monitoring

To ensure that the Plan is effective and capable of responding in a timely fashion to changes in circumstances a robust MF is essential. To be effective it must contain specific targets and triggers. Based on my initial reading it seems to me that the present approach contain shortcomings, including inconsistency of approach between topic areas, and a failure in some areas to set meaningful targets and trigger levels. In other instances the trigger levels may lack adequate flexibility to allow for modest variations from the target. This would create unnecessary work for the Council's in responding to the activation of these triggers in their Annual Monitoring Report. An overview and revision of the MF would be helpful in advance of the commencement of the hearing sessions. The SA scoring in parts is based on the effectiveness of a monitoring framework to mitigate potentially harmful effects. Notwithstanding the focussed changes that have been

presented, this linkage should be explored further and the MF amended accordingly.

You are requested to respond to the above points, setting out a detailed timescale for any further work which you may intend to undertake, by 31 May 2016. The Pre-Hearing Meeting which is scheduled for 14 June 2016 will provide an opportunity for discussion of the arrangements for the submission of such additional work. As you will appreciate it will not be an opportunity to discuss the merits of the Plan or the supporting evidence. Any additional information or further exchanges regarding these matters will be placed on the examination website for the information of other interested parties.

If you require further clarification on any of the above then please do not hesitate to contact me via the Programme Officer.

Yours sincerely,

Hywel Wyn Jones

INSPECTOR

ANNEX to Inspectors' Preliminary Note to Councils

Housing Supply and Trajectory – following on from point 2 of the attached letter, the following are matters that should be included in the Council's response.

- a. Policy PS15 (as proposed by Focussed Changes) sets out a distribution of housing between the 3 tiers of the identified settlement hierarchy which group together settlement categories. The Councils should set out how the predicted supply of housing for each tier compares to the percentages identified in this policy. In identifying the predicted supply it will be necessary to provide definitive figures that address any potential discrepancies between the evidence base and figures in the Plan with an explanation for the position taken.
- b. The assumption for annual windfall delivery in the lower tier settlements is estimated to increase in 5 years' time from 152 to 186 for the remaining 6 years of the Plan. Whilst this coincides with the 'step change' date, how would the delivery of windfall sites be influenced by the Plan? My understanding is that the approach to the delivery of windfalls over time in the higher tier settlements is to assume the same delivery figure for each of the remaining years of the plan (which might usefully be adjusted to start in 2016-17 given the anticipated Plan adoption timescale). How does such an approach measure against the fact that the Plan anticipates that build rates will increase over time as the after effects of the recession reduce? In this respect it is noted that in the Housing Viability Update the author concludes that there is no obvious sign that this is going to happen (para 5.2).
- c. More generally, given the amount of housing expected to be delivered in the lower tier villages, further detail should be provided on how individual villages' windfall capacity has been derived. There appears to be inconsistency in the predicted delivery from windfalls between TP20 and the Plan. For instance: tier 1 settlements TP20 appears to assume 1370 from windfall (based on urban capacity study) whereas TAI14 identifies 1630; and for tier 3 TP20 (based on annual rates mentioned in b. above) estimates 1876 whereas TAI16 & 17 calculate 1156 (is the whole of the shortfall accounted for by housing in clusters and countryside?).
- d. Policy PS13 refers to two time-based housing targets, and TP20 refers to a 'step change' in the approach to the provision of housing at year 2018/19. Further explanation of this approach including how the Plan will give effect to this should be provided. A trajectory of housing supply which shows its spatial distribution would be helpful in this respect together with a commentary on any correlation between this trajectory and the identified 'growth requirement' in the latter Plan period which seeks to respond to the anticipated development of large infrastructure projects, notably Wylfa Newydd.
- e. Following from point d. above – PS13 identifies a baseline requirement to 2018 of 2,604 whereas there are presently 3,817 dwellings that are under construction or have planning permission (Tables 18 & 19 of Plan).

- f. TP20 – paragraph 3.2 refers to a ‘graduated approach’ to housing requirements by identifying 2 periods. A further explanation of this approach would be helpful – whilst I note the content of PS13 to these 2 stages I cannot identify how the Plan makes provision for 2 periods with different requirements. I also have difficulty in understanding the comment in TP20 that the Councils are in a vulnerable position regarding a 5 year supply when Appendix 2 shows a 6.26 year supply in 2015-16 rising thereafter (notwithstanding that I may have some reservations regarding these figures).
- g. Appendix 1 of TP20 – what is the evidence that supports the trajectory of individual sites?
- h. Appendix 2 of TP20:
 - i. The ‘total completions’ could be usefully broken down to allocated and windfall sites (it appears that the level of windfalls is factored in at a constant figure of 339 after 2015-16 – see point c. above)
 - ii. The total cumulative completions at the end of the Plan period is 940 more than the requirement. An explanation of how this over-provision arises, which should include how the issue of the 10% flexibility (which is to allow for slippage) has been treated.
 - iii. The method for calculating the 5 year housing supply to include a period which partly extends beyond the plan period is identified in paragraph 5.2 of TAN1. This is not acknowledged in the approach in appendix 2 of TP20.
 - iv. Column g refers to the ‘total land available’ – how have these figures have been derived?
- i. There are several references to ‘policy requirements’ in terms of phasing in the Plan and TP20. However, my reading of the Plan, including the proposed introduction of policy TAIX, is that the Plan does not influence phasing. Whether it ought to do so is a matter that will require consideration, but I should advise that I presently have reservations in terms of allowing total discretion to the decision maker on an individual planning application whether or not to phase the development. The absence of any clarity on what limitations may be imposed on developers or a coherent approach to controlling such phasing restrictions does not appear to provide the degree of certainty that a plan-led system seeks to achieve. The Councils may wish to consider their position on this matter in advance of the hearing sessions.
- j. Information is provided on existing commitments. However, it would be useful to provide a breakdown of these figures to include: their status (distinguishing between those built, under construction and those with permission but not commenced); those that are allocated, and those that are windfalls; and the category and tier of the hierarchy within which each site falls.