SUPPLEMENTARY PLANNING GUIDANCE: HOUSING MIX

THE CONSULTATION REPORT





OCTOBER 2018

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1.0 BACKGROUND

Purpose of Supplementary Planning Guidance (SPG)

- 1.1 The Purpose of SPGs are to:
 - assist the applicants and their agents in preparing planning applications and in guiding them in discussions with officers about how to apply relevant policies in the Joint Local Development Plan before submitting planning applications,
 - assist officers to assess planning applications, and officers and councillors to make decisions about planning applications
 - help Planning Inspectors make decisions on appeals.
- 1.2 The general aim is to improve the quality of new developments and facilitate a consistent and transparent way of making decisions that align with relevant policies in the Joint Local Development Plan.

The Policy Context

Local Development Plan

- 1.3 Under planning legislation, the planning policies for every area are contained within the 'development plan'. The Gwynedd and Anglesey Joint Local Development Plan was adopted on 31 July 2017. It relates to the Gwynedd and Anglesey Planning Authority areas.
- 1.4 The Plan provides wide-ranging policies along with allocations for the main land uses, such as housing, employment and retail; it will help shape the future of the Plan area physically and environmentally, and will also influence it economically, socially and culturally. The Plan, therefore:
 - enables the Local Planning Authorities to make rational and consistent decisions on planning applications by providing a policy framework that is consistent with national policy; and
 - guides developments to suitable areas during the period up to 2026.

The need for Supplementary Planning Guidance

1.5 Although the Plan contains policies that enable the Local Planning Authority to make consistent and transparent decisions on development applications, it cannot provide all the detailed advice required by officers and prospective applicants to steer proposals locally. In order to provide this detailed advice, the Councils are preparing a range of SPGs to support the Plan that will provide more detailed guidance on a variety of topics and matters to help interpret and implement the Plan's policies and proposals.

The Status of Supplementary Planning Guidance

1.6 Supplementary Planning Guidance (SPG) will be material planning considerations during the process of assessing and determining planning applications. Welsh Government and the Planning Inspectorate will place considerable weight on supplementary planning guidance that stem from, and are consistent with, a development plan. The SPGs cannot introduce any new planning policies or amend existing policies.

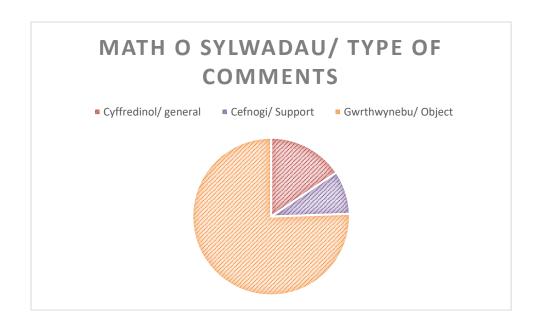
1.7 Once it has been adopted SPGs should, therefore, be given substantial weight as a material planning consideration.

2.0 THE CONSULTATION REPORT ABOUT THE SUPPLEMENTARY PLANNING GUIDANCE: HOUSING MIX

- 2.1 There is a definite need not only to improve the affordability of homes across the Plan area, but also to contribute to a number of outputs that include:
 - good quality homes that are well designed and built to a high standard, which includes sustainable design, improving accessibility to some groups, e.g. people with care needs or need an accessible property, is suitable long term (LifeTime Homes);
 - ii. a mix of market and affordable housing to support diverse households who live in towns and villages;
 - iii. housing developments in appropriate places where a good range of community facilities can be accessed and where work opportunities, services and key infrastructure can be easily accessed.
- 2.2 The Authorities want to maximise their planning powers to get appropriate new housing in the Plan area. The Authorities therefore want to make sure that the type, size and tenure of houses that are built are the right ones to give people that require permanent homes in the Plan area the opportunity to live in a quality home that meets their needs.

Public Consultation

- 2.3 A draft version of this SPG was approved for public consultation by the Joint Planning Policy Committee on the 26th April 2018. This draft was prepared in consultation with officers from the Development Management Section and Tourism Section of both Authorities. Prior to this the SPG was reviewed by the Joint Local Development Plan Panel on the 22nd March 2018.
- 2.4 The SPG was the subject of a public consultation exercise between the 17th May and the 28th June, 2018.
- 2.5 Details of the public consultation were placed on both Council's websites and emails/ letters were sent to all Councillors, Community Councils, statutory consultees, neighbouring authorities, planning agents, house building companies. Hard copies of the SPG were also available to inspect in all public libraries, Anglesey County Council's main office in Llangefni, and in Siop Gwynedd (Caernarfon, Dolgellau and Pwllheli).
- 2.6 A number of platforms were available for interested parties to respond to the consultation, which were:
 - Online interactive form (created and managed by Gwynedd Council's Research unit)
 - Online word and pdf response form available on both websites and paper copies were made available in all libraries and Siop Gwynedd. Paper copies of the response form were also available on request from the JPPU
 - Email
 - Letter
- 2.7 A total of 45 comments were received: 7 general comments, 4 in support and 34.



2.8 The following section summarises the comments received, the Councils' response to the comments and, where appropriate, recommends any changes required to the SPG in lieu of the comment.

APPENDIX 1 – SUMMARY OF COMMENTS RECEIVED AND THE RESPONSES

Part	Rep. No.	Name	Summary of rep	Response
1.1 (i)	6	Gwasanaeth Tai Cyngor Sir Ynys Mon		Comment accepted. Suggest adding to the text in accordance with the comment:
				" good quality homes that are well designed and built to a high standard, which includes sustainable design, improving accessibility to some groups, e.g. people with care needs or need an accessible property, is suitable long term (LifeTime Homes)"
1.1	17	Bwrdd Gwasanaethau Cyhoeddus Gwynedd a Mon, Grwp Cartrefi ar gyfer Pobl Leol		Accept the comment and suggest amending the sentence in accordance with the comment. "The Authorities recognise the importance of creating sustainable, inclusive, distinctive, mixed and balanced communities throughout the Plan area, in towns or villages alike."
1.1 (i)	18		with care needs or need for an accessible property	Comment accepted. Suggest amending the sentence to refer to the matters raised. "good quality homes that are well designed and built to a high standard, which includes sustainable design, improving accessibility to some groups, e.g. people with care needs or need an accessible property, is suitable long term (LifeTime Homes)"
1.1 iii	26			Comment noted. However, the information provided in the commentary is not relevant to the content of the SPG. The

Part	Rep. No.	Name	Summary of rep	Response
				housing supply identified for Penrhyndeudraeth has been set in the Plan's Strategy and Policies, which were subject to a Public Examination before the Plan was adopted. The SPG cannot introduce new policies or amend existing policies. No change
1.10	13	Cyngor Tre Penrhyndeudraeth	discussions '. In order to protect the community fabric and	the SPG, which provide a schedule of sources of information and evidence that an applicant will be expected to consider during the pre-application stage and to record at the planning application stage. No change.
1.2	28	Pwyllgor Ymgyrch Ta Penrhyn	What guarantee is there that Gwynedd Council keeps its word on this? There is a need for much more detailed	Comment noted. The rest of paragraph 1.2 gives sufficient information within the context of the CCA about the role of the Councils as Housing Authorities. The rest of the SPG provides guidance about how to use Policy TAI 8 as one of the series of policies that will assist the planning authority as a facilitator in the housing market. A Local Market Housing SPG and SPG on affordable housing will provide guidance about how to use other relevant policies in the Plan. Suggest that paragraph 1.3 is amended to refer to other policies and SPGs.

Part	Rep. No.	Name	Summary of rep	Response
				"However, the Authorities want to maximise their planning powers to get appropriate new housing in the Plan area. In addition to the Plan's Policies that direct housing to various locations, Policies TAI 15 and 16 in the Plan, for example, promote affordable housing, and Policy TAI 5 promotes local market housing in settlements listed in that policy. SPGs about these types of housing will provide guidance on how to use these Policies. Policy TAI 8 and this SPG will focus on promoting the right mix of new housing. The Authorities therefore want to make sure that the type"
1.2	27	Penrhyn	more housing but there is no need to build too many, and there is no sense that Gwynedd Council hopes to build TRIPLE the number of houses the people of Penrhyndeudraeth need. The people in the area need 42 houses; Gwynedd Council wants to see 126 houses.	Comment noted. It's not the SPG's role to determine the number of houses in Penrhyndeudraeth. The housing supply identified for Penrhyndeudraeth has been set in the Plan's Strategy and Policies, which were subject to a Public Examination before the Plan was adopted. The SPG cannot introduce new policies or amend existing policies. No change
1.5	7	, -	term, - lifetime homes	Accept the comment. Suggest adding to the text in accordance with the comment: "Good quality – whether the affordable unit can comply with Development Quality Requirements, whether the property is resource efficient, whether the homes are suitable for long term use, - 'lifetime homes'."
1.5	19		•	Accept the comment. Suggest amending the sentence to refer to the matters raised.

Part	Rep. No.	Name	Summary of rep	Response
		Mon, Grwp Cartrefi ar gyfer Pobl Leol		"Good quality — whether the affordable unit can comply with Development Quality Requirements, whether the property is resource efficient, whether the homes are suitable for long term use, - 'lifetime homes'."
1.6	11	Penrhyndeudraeth	expected to provide market housing and/or affordable housing that meet the proven need and demand for housing." is key and fundamental to the housing provision policy of the Anglesey and Gwynedd JLDP's and a departure from it should not be entertained. The rest of the paragraph	Comment noted. However the text of the rest of the paragraph reflects the requirements of the Plan's affordable housing policies, which in turn reflects national planning policy, where it is stated that consideration must be given to all material planning considerations, which includes viability of schemes. The text in paragraph 1.6 says quite clearly that only in exceptions can proposals that reach the affordable housing policy thresholds but are unable to contribute to adding to the stock of affordable housing can be supported. No change because doing so would amount to changing an adopted policy, without the change going through the required process of monitoring, reviewing and revising the Plan.
1.6	30			Comment noted. The commentator ignores the rest of the sentence, which clearly states that only in exceptions will this happen after the applicant has been able to demonstrate with robust evidence that affordable housing cannot be provided. Parts of the rest of the SPG points to evidence that will be necessary about the tenure of the proposed housing. In doing so, reference is made to Policy TAI 15 and TAI 16. A decision about a planning application must be made in accordance with policies in the Plan unless material planning considerations indicate otherwise. The policies and the approach to making a decision about

Part	Rep. No.	Name	Summary of rep	Response
				planning applications recognise the need to give detailed consideration to the viability of schemes.
				No change
1.6	29	Pwyllgor Ymgyrch Tai Penrhyn	All the reference to 'satisfying a <u>local</u> need and demand for housing' is noted.	Comment noted
1.7	31	Pwyllgor Ymgyrch Tai Penrhyn	potential to support a variety of services and facilities, including shops, schools and local community buildings.	No change
1.9	12	Cyngor Tref Penrhyndeudraeth	contents of the comment on paragraph 1.6: "Ensuring that the right type of housing is developed will be just as important in terms of community cohesion and its fabric,	Comment noted. The respondent refers to recognised sources of local knowledge about the local need for affordable housing (intermediate and social) in Penrhydeudraeth. This SPG refers to the importance of using information from existing sources to help determine the

Part	Rep. No.	Name	Summary of rep	Response
			the Social Housing Register held by Gwynedd Council's Housing Service. Therefore, according to the statement	
1.9	32	Pwyllgor Ymgyrch Ta Penrhyn	surveys - if available and up-to-date), to help identify gaps in the housing needs of existing and potential new families helps to ensure that the housing provided can meet the needs of the local community'. But Gwynedd Council itself ignores the detailed survey carried out by the Penrhyndeudraeth Town Council to find out how many houses are actually need by the residents of Penrhyndeudraeth (see the letter from Councillor Dafydd	Comment noted. The SPG confirms the role of local surveys as a source of information for consideration by the applicant in deciding what type of housing to be included in the planning application and the number of affordable housing. The SPG recognises the importance of the availability of the information and that it is up-to-date. Usually, a survey provides a snapshot of the situation at a particular point in time for a period not normally exceeding 5 years. When a local survey has been published by the person who undertook it, the Planning Authority and the Housing Authority (in its role as a stakeholder who express views on planning applications) can refer to it when assessing planning applications.
3.4	33	Pwyllgor Ymgyrch Ta Penrhyn	expectations as regards ensuring the best way for a mix of	

Part	Rep. No.	Name	Summary of rep	Response
			to the housing stock in the best way because there is no need for such a large number of houses in the village. The fact that we are expected to embrace a huge number of new housing (which will have a detrimental impact on our local community), primarily in order to contribute to a number of housing needed for the whole area of the local development plan (namely Gwynedd and Mon) is completely unacceptable.	
3.4	14	Cyngor Tre Penrhyndeudraeth	The second clause of the second sentence in the paragraph is welcomed. Adapting existing buildings makes a lot of sense, whether it would be solely in terms of saving a lot of greenfield site, not to mention saving costs. See, also, item 6, policy TAI 8, page 8.	
3.5	34	Pwyllgor Ymgyrch Ta Penrhyn	The Councils will consider information from a variety of sources, which include Local Housing Market Assessment, Housing Needs Studies, etc an applicant is expected to examine these recognized sources' Gwynedd Council itself does not give a fair and balanced consideration of the Penrhyndeudraeth Town Council's survey of local need for housing.	No change
3.6	36	Pwyllgor Ymgyrch Ta Penrhyn	The Councils will promote and support the use of the language in the (Local Development) Plan area by asking for a Language Statement that will say how the proposed development will protect, promote and strengthen the Welsh language Meaningless words! Gwynedd Council gave the go-ahead to Morbaine's planning application to build 366 houses in Penrhosgarnedd, and the Welsh	No change

Part	Rep. No.	Name	Summary of rep	Response
			Government's Planning Inspector rejected the application in the end.	
3.6	35	Pwyllgor Ymgyrch Tai Penrhyn	that the Council requires that the Welsh language is given particular consideration, as does the clunky phrases '	No change
3.6	1	Cyngor Tref Caernarfon	the 'pre- application' period because it would be too late after the application is considered. (so the company would	Accept the comment. Paragraph 3.5 draws attention to Policy PS 1 because one of the criteria in it would mean the need for a Language Statement when the housing mix doesn't tackle the evidence about the need and demand for housing, and that another criterion refers to major housing development on unexpected windfall sites. Another SPG will provide more guidance about how to use PS Policy 1. However, it is agreed that it would be useful to draw the applicant's attention to the need to give full consideration to Policy PS 1's requirements prior to the completion of the process of preparing a planning application. " This provides advice on a series of Policies in the Plan that promote sustainable development. It gives specific advice on using Policy PS 1, which requires more information in the form of either a Welsh Language Statement or a report on a Welsh Language Impact Assessment when a development meets specific criteria, which includes one

Part	Rep. No.	Name	Summary of rep	Response
				relating to the suitability of the housing mix on sites for 5 or more housing units, and another related to the large development of houses on unexpected windfall sites. For convenience, see below a copy of Policy PS 1 that presents those criteria. An applicant will be expected to give detailed consideration to the requirements of Policy PS 1 at the preapplication stage:
3.6 rhan o Bolisi PS 1		Cyngor Tref Penrhyndeudraeth	'Language Statement ' and item 2 ' 'Language Impact	No change
4.13	39	Pwyllgor Ymgyrch Tai Penrhyn	the Local Housing Market Assessment Gwynedd 2013 provide a snapshot of the amount of affordable housing that is likely to be needed in Anglesey and Gwynedd, i.e. approximately 889 housing units per year for five years to meet the accumulated needs over the years and emerging	Comment noted. This part of the SPG records factual information from a recognised and published source of information about the level of need for affordable housing in the Plan area. Both Council's Housing Services follow a methodology set by Welsh Government to identify a figure. The comment regarding the level of housing supply apportioned to the Penrhyn area in the Local Development Plan is not relevant to the SPG's content.

Part	Rep. No.	Name	Summary of rep	Response
			years? Emerging housing need - Wylfa Newydd? Why should the Penrhyn area provide housing for possible Wylfa Newydd workers?	
4.16	40	Pwyllgor Ymgyrch Tai Penrhyn	Housing Enablers to 'to help families achieve quality and affordable homes, to stay in their communities.' According to Gwynedd Council's Rural Housing Enabler's latest survey, 42 houses are needed by Penrhyn's residents. Why,	Comment noted. The figure referred to was obtained by searching the Tai Teg Register and the Social Housing Register on a specific date in order to identify how many households had registered a need for affordable housing (intermediate and social) at that point in time. The comment about the level of housing supply apportioned to the Penrhyn area is not relevant the content of the SPG.
4.17	41	Pwyllgor Ymgyrch Tai Penrhyn	Reference is made here to the emphasis that will be given to local surveys of housing required locally'. Hypocrisy! It is completely obvious that Gwynedd Council does not give any weight to the findings of local surveys.	Comment noted.
4.4	37	Pwyllgor Ymgyrch Tai Penrhyn	'Affordability is a challenge in several parts of the (Local Development) Plan'. But securing affordable housing in the Penrhyndeudraeth area is completely essential.	
4.4	20	Cyhoeddus Gwynedd a		

Part	Rep. No.	Name	Summary of rep	Response
4.6	8	Gwasanaeth Tai Cyngor Sir Ynys Mon	other areas, - may not be relatively high figures.	Comment noted. The information on the website of the reports shows that more households have received this support in other areas. Not considered that there is merit in referring to this in the text because it is referred to in the SPG as an example of initiatives that could assist households. Examination of the Stats Wales website reveals that information up to Quarter 1 2018-2019 is now available, which provides an opportunity to update the information in the SPG: change the figure from 150 to 174 and refer to Quarter 1 2018-2019, as follows: "According to statistics from the Welsh Government (StatsWales), 174 applications for Help to Buy were completed in Gwynedd and Anglesey between 2013/2014 - Quarter 1 2018/ 2019.
4.6	21	Cyhoeddus Gwynedd a	It is noted that the number of people that have been able to take advantage of the 'Help to Buy' scheme in Anglesey and Gwynedd has been limited due to the scarcity of suitable schemes or limitations to specific areas.	
4.7		Bwrdd Gwasanaethau Cyhoeddus Gwynedd a Mon, Grwp Carterfi ar gyfer pobl leol		Comment accepted. Suggest referring to Wylfa Newydd as one of the large infrastructure projects referred to. "The work was needed to gain an understanding of the potential capacity and potential role of the sector to meet the anticipated additional demand for accommodation in the light of the key economic developments in the Plan area, e.g. Wylfa Newydd."

Part	Rep. No.	Name	Summary of rep	Response
4.7	38	Pwyllgor Ymgyrch Tai Penrhyn	potential capacity and potential role of the sector to meet the anticipated additional demand for accommodation in	No change
5.4	24	Cyhoeddus Gwynedd a	Need to emphasise the option for people to stay in their homes for longer if the property is appropriate and the opportunity therefore to avoid spending on adaptations.	·
5.4	9		Need to ensure that houses that are built are accessible and that they can be adapted.	Comment accepted. Suggest reference is made to the matters referred to in the list of examples provided at the end of the paragraph. "The area's housing needs to address the needs of an aging population. Consideration should be given to how the choice for older people can be increased in the future, e.g. making it easier/ attractive to go to a smaller house, that new houses are accessible, designing new homes are suitable for a lifetime, that adaptations to existing houses are supported,

Part	Rep. No.	Name	Summary of rep	Response
				or there are opportunities to go into extra care homes if that is the household's desire. "
6.1	2	Cyngor Tref Caernarfon	When considering flats above shops, note/ consider that this can have an effect on local shops, - therefore need to emphasise 'if there is a separate access'	Accept the comments. Suggest adding the following to the text: "One way of providing this is by reviving the stock of flats above shops in our towns (if there is a separate access to the floors above the shops), or"
6.1	10	Gwasanaeth Tai Cyngor Sir Ynys Mon	Smaller properties can also provide opportunities for older households to move to smaller properties.	Comment accepted. Suggest including a reference to this matter in 6.1 (i): Providing two and three-bedroom apartments/ houses (whether they are new build, change of use of non-residential buildings or bringing empty houses back into use) will increase the choice for smaller families, young couples, young people who wish to share, or older households who wish to down-size". These types of households would find it difficult to afford four or five bedroomed houses, or houses of this size would be too big for their requirements. The provision of a few one-bedroom apartments/ houses could help meet the needs of some single young people, young couples, and some older households"
6.1	23		Smaller properties can also be attractive to older households that want to move to a smaller property and	Accept comment. Suggest amendments to cover the matter raised.

Part	Rep. No.	Name	Summary of rep	Response	
		Mon, Grwp cartrefi i bobl leol	sometimes avoid costs associated with maintaining the property, the garden, etc.	Providing two and three-bedroom apartments/ houses (whether they are new build, change of use of non-residential buildings or bringing empty houses back into use) will increase the choice for smaller families, young couples, young people who wish to share, or older households who wish to down-size". These types of households would find it difficult to afford four or five bedroomed houses, or houses of this size would be too big for their requirements. The provision of a few one-bedroom apartments/ houses could help meet the needs of some single young people, young couples, and some older households"	
6.1 (ii)	3	Cyngor Tref Caernarfon	Policy TAI 8 under point 5 - need more bungalows as noted in 6.1 (ii)	Comment noted	
General	16	Cyngor Tref Ffestiniog	The Ffestiniog Town Council doesn't have any objections to the Supplementary Planning Guidance	Comment noted	
General	25	Pwyllgor Ymgyrch Tai Penrhyn	Council and Anglesey Council to use natural, clear Welsh.	The principles behind the comment is noted. The draft document has been sent to the Translation Unit to read and suggest amendments. The final draft incorporates the recommended amendments.	
General	4	Cyngor Tref Caernarfon	The Council supports the fact that the Welsh language is considered as retaining Welsh names is very important.	Comment noted	
General	5	Cyngor Cymuned Llanystumdwy	No specific comments	Noted	

Late representations

Part	Rep. No.	Name	Summary of rep	Response
6.1	43	Natural Resources Wales	Reminds the Authorities that Planning Policy Wales (13.4.) states "Development proposals in areas defined as being of high flood hazard should only be considered where the development proposal would not result in the intensification of existing development which may itself be at risk." 'Highly vulnerable' development includes housing.	relevant housing policies as well as all other relevant policies, which would include Policy PS 6 Climate Change if the
General	44	Natural Resources Wales	It may be appropriate to stress that climate change is likely to have a substantial impact on coastal communities over the coming years and any future development will need to fully consider and where possible mitigate for, the impact of climate change.	a Coastal Change Management Area based on the policy
General	45	Natural Resources Wales	The SPG has been written to address Policy TAI 18 – Appropriate Housing Mix and sets out how planning proposals should support the LPA's requirement to deliver sustainable mixed communities. We have no additional comments to make on the content of this document, but we would welcome the scope of guidance to applicants and planning officers for new residential development be broadened either within this document or an accompanying SPG, to help explain how planning applications can support Policy PCYFF3 Design and Place Shaping.	review their existing Guidance about design matters. It is programmed to be published for public consultation during 2019. No change required to the SPG about Housing Mix.