

ARCHWILIAD CYNLLUN DATBLYGU LLEOL ERYRI
ERYRI LOCAL DEVELOPMENT PLAN EXAMINATION

MATTERS AND ISSUES FOR HEARING
SESSIONS

1, 2 AND 3

SUBMISSION OF EVAN OWEN
BYWYD CYMRU
RESPONSES IN GREEN

Eryri Local Development Plan 2016 – 2031

Hearing Session 1:

Chapter 2 The Development Strategy Chapter 5 Healthy and Sustainable Communities – Housing Provision

Matters & Issues

Chapter 2 The Development Strategy

1. Has the Revised Plan been prepared in accordance with the necessary procedural requirements?

- a. Has the Revised Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?

No, as a planning agent I wasn't consulted during the initial stage despite being on WG JHLAS study groups for many years, I assume this was because they didn't like what they were hearing. Very few public responses have been received, community councils failed to respond in any meaningful way. Was this the intention?

- b. Has the Plan been subject to a robust: Sustainability Appraisal; Strategic Environmental Assessment; and Habitats Regulations Assessment/Appropriate Assessment?

- c. Has the Plan been informed by a robust consideration of reasonable alternatives? **No, the SNPA was told this plan wouldn't work at every stage, it needs a full review now or matters will never be resolved.**

2. Does the Plan's Vision continue to be sufficiently aspirational and locally specific to form the basis for planning to 2031? Are the proposed revisions to the LDP sufficiently specific to the National Park?

- a. Do they continue to reflect local distinctiveness? **The land equates to 20% of Wales, the plan does not take account of the wide variety of communities, in fact some communities larger than Trawsfynydd or even Harlech with available land and adequate infrastructure have been squeezed out and described as 'Rural' despite having 'Green Wedges'.**

- b. Do they have regard to the National Park Management Plan?

- c. Do they adequately reflect the statutory purposes and duty of National Parks? **The plan largely ignores the duty to foster the social and economic wellbeing of the residents, it is forcing youngsters to leave using the tactic described by**

international human rights observers as 'Soft Eviction' and 'Voluntary Resettlement'.

- d. Strategic Policy A: A new criterion has been added regarding the production of Place Plans. Should the plan include an explanation of what Place Plans are and what they are designed to do? **Of course, it should.**

3. Although no changes are proposed to the overall strategy, does it continue to be a coherent strategy from which its policies and allocations logically flow and is it founded on robust evidence?

- a. Does the scale and location of development continue to address the issues that the LDP has identified? **No, it clearly does not, in fact the LDP hasn't identified the issues.**
- b. Is the level of growth within the Settlement hierarchy justified and soundly based? Is there sufficient continued justification for the settlement categorisation? **The Settlement hierarchy is illogical, particularly for urban areas like Dyffryn Ardudwy (ONS Built Up Area) (Appendix A) "2011 Census: Characteristics of Built-Up Areas**

An insight into the characteristics of built-up areas in England and Wales. We look at comparisons between built-up areas of different sizes, as well as between built-up areas and non built-up areas. In 2011, 95% of the resident population lived in built-up areas, with the smallest built-up areas having a population of just over 100, and the largest having a population of nearly 9.8 million.

4. Introduction

Built-up areas in England and Wales, previously known as urban areas, have been produced every 10 years since 1981. Built-up areas are defined as land which is 'irreversibly urban in character', meaning that they are characteristic of a village, town or city. They include areas of built-up land with a minimum of 20 hectares (200,000m²). Any areas with less than 200 metres between them are linked to become a single built-up area. This was done using an automated method that replicated the manual procedure used previously"

- c. Are the percentage targets and ranges set out within Strategic Policy C appropriate and based on robust evidence? **No, I said this policy would not work at outset, it has failed to date as predicted, it should be completely reviewed to make the plan sound.**
- d. Does the Plan's Spatial Strategy represent a sustainable approach to planning, including in terms of transportation, over the Plan period? **No, it is illogical.**
- e. Is there sufficient continued justification for the pattern of housing and development distribution adopted? Is the inclusion of general market housing within Service Settlements and Secondary

Settlements appropriate? **No, the distribution patterns were flawed at outset. Without market housing no private developers will come forward wherever the housing need is. The background papers and 'Further Evidence plus Andrew Golland's Viability Update are mostly inaccurate. This has caused problems in the 19 Welsh LPAs who now fail to show a 5 Year Land Supply.**

- 4. Is the Plan's Strategy sufficiently flexible to respond to changing circumstances? Does the Plan continue to provide robust mechanisms for the Monitoring and Implementation of the Plan's Strategy?**

Chapter 5 Healthy and Sustainable Communities – Housing Provision

- 5. Is the spatial distribution of new housing consistent with the principles of sustainable development?**

- a. Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy? **The identified settlement hierarchy needs a review and that means the allocations are not based on actual housing need or a realistic assessment of community sustainability. The alternatives sites for example. See Appendix B**
- b. Will the spatial distribution of housing growth minimise any increase in car journeys, sustain rural communities and safeguard local facilities and services? **No, how can it?**
- c. Does the distribution of housing adequately relate to existing and proposed transport infrastructure, and relate to where people are likely to work, shop and participate in leisure? **No, it appears to be trying to reverse population growth on the coast where the work is and where the main transport routes and infrastructure are.**

- 6. Is the housing requirement figure of 770 (51 units per annum) appropriate and realistic to meet the needs of the Authority over the Plan period?**

- a. Has the Revised Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales? **No, if it had the figures would be far higher than those they are refusing to provide.**
- b. In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections, e.g the 2014-based projections? **No**

- c. Has the requirement figure been informed by a robust assessment of the main local influences on housing demand, including: household formation, migration, and household conversion ratios. **No**
- d. Should the level of housing provision, Plan requirement and a list of housing allocations be included within Strategic Policy G? **Yes**

7. Are the Housing Supply calculations and assessments within the Revised Plan appropriate?

- a. Are the figures set out within the Plan sufficiently up to date, accurate and clearly set out? **No**
- b. Will the Plan provide a 5 year supply of housing for the duration of the Plan? Does the LDP provide a satisfactory total amount of land for housing development? **No, impossible given the level of need.**

8. Have the inter-relationships between the LDP's growth strategy and the strategies of neighbouring authorities been taken into account?

- a. There is a continued acceptance in the Revised Plan that settlements outside the Park but on the border can provide housing, employment and other services for residents. Is there sufficient evidence that part of the need identified can be met by neighbouring authorities? **There was no evidence when the plan was adopted, this is a major flaw in the strategy.**

9. Will the level of growth proposed be delivered?

- a. Does the strategy rely too heavily on existing commitments and windfalls? **Yes, I can't understand why this simple review was deemed the best way forward given the failure of the LDP to meet legitimate expectations.**
- b. Is the LDP's estimate of windfall sites coming forward realistic? **No, the evidence supporting the flawed strategy is itself flawed.**
- c. Is the estimated number of conversions reasonable? **No, far too high.**
- d. Is the LDP's estimate of small site contributions too high? **Yes, they continue to with the flawed figures that have brought about the lack of a 5 year land supply.**
- e. Are the proposed completions rates realistic? What are the implications of failing to deliver the required amount of housing? **Unrealistic. More 'Soft Eviction'**
- f. Is there sufficient flexibility to deal with the failure of sites listed in the LDP to come forward? Is the contingency (40 units)

enough? Does the 5% slippage allowance provide sufficient flexibility in the event of sites not coming forward as anticipated? **No, when asked if they can change this even slightly they said NO. No flexibility whatsoever.**

- g. Are all the site allocations available and deliverable within the anticipated timescale? **Not all of them.**
- h. Are the allocations supported by a robust and comprehensive site assessment methodology, free of significant development constraints and demonstrated to be economically viable and deliverable? **No.**
- i. Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites, including in terms of sewerage capacity? **No**
- j. Is allocating so many sites for 100% affordable housing (11 out of 16 allocated housing sites) a sensible approach where there may be viability issues that could affect delivery? **No, this is illogical and the reason why the plan has failed.**

Affordable Housing:

- 10. Is the affordable housing target of 350 units appropriate given the overall need for 2,130 units? How does the Plan provide for the different types of tenure required to meet the need? **Clearly not a realistic target. Can't see how the needs to disparate communities have been assessed.****
- 11. Are the thresholds for affordable housing delivery set out in 'Strategic Policy G: Housing' realistic and founded on a credible assessment of viability?**
 - a. Should Strategic Policy C specifically refer to the up to date figure for affordable housing need? **Yes**
 - b. Does the Plan maximise the delivery opportunities for the provision of affordable housing? Does the Plan strike an appropriate balance between landscape protection and affordable housing provision? **No, there needs to be more emphasis on the Duty to foster the social and economic wellbeing of communities.**
 - c. Is the affordable housing target of 350 units achievable? Are those units anticipated within lower tier settlements and the countryside based on sound and robust evidence that takes adequate account of local housing markets and need? **No**
 - d. Is the Plan based on an up-to-date assessment of the full range of housing requirements across the National Park? Has there been an assessment of the required tenure mix (e.g. affordable, intermediate and social rented housing)? How will the Plan ensure a balanced mix of house types, sizes and tenure that are related

to the needs of the area? **Not based on an up to date assessment, never has been.**

- e. Are the affordable housing contributions that are sought financially viable and based on sound methodologies and assumptions? How has the level of contribution taken into account rising build costs, including the sprinkler requirements introduced into the Building Regulations, and other associated costs? **No, the same methodology has been used in the adopted plan, it has failed as have most local plans in Wales. The background papers and 'Further Evidence plus Andrew Golland's Viability Update are mostly inaccurate.**

- f. How will off site contributions be used to deliver affordable housing, and what mechanisms are in place to ensure that the levels of contributions sought are realistic and transparent? **Figures seem to be plucked out of a hat. The LPA has said it isn't a Housing Authority.**

- g. Past trends indicate that larger sites and those with Social Housing Grant (SHG) funding in place are more viable. How will the sites within the Local Service Centres, Service Settlements and Secondary Settlements be delivered? Will the required number of affordable houses be delivered? **The required number will not be delivered and they won't be in the right places, nobody wants to live in Bala if they have a choice.**

- h. Is the Plan sufficiently clear on the delivery and viability of affordable houses within sub market areas? **Again no.**

- i. It is likely that individual plots and conversions will be developed by private individuals (as shown by past trends). In the absence of Social Housing Grants (SHG) being available for private developers, will such schemes be viable? **No, the problems faced by self-builders are horrendous now.**

- j. What evidence is there of close liaison with housing providers in the National Park? **None, the Authority has been completely negative on some sites that housing associations are keen to develop. A PreApp has been submitted of two of them.**

- k. Is there sufficient evidence that part of the need identified can be met by neighbouring authorities? **There has been no evidence to date and there will be none going forward. It is illogical to expect largely rural areas in neighbouring authorities to meet the housing need in 20% of Wales which has the lowest average wage in the UK and where the communities along the coast are being suffocated out of existence by holiday homes and lets.**

12. Does the Plan provide a sound basis for implementation and monitoring of housing provision?

- a. Does the Plan incorporate robust monitoring and review mechanisms that will enable the open market housing and affordable housing strategies to respond effectively to changing circumstances, such as changing market conditions? **The Authority has failed to establish the real need at every stage, deliberately.**
- b. Does it contain clear identifiable targets and milestones as well as triggers for action if the numbers do not come forward as anticipated? **The Authority has no incentive to do so, it has repeatedly said that it is not a housing authority.**

13. The Welsh Language and Communities

- a. Do the thresholds set out in Policy 18 continue to be fit for purpose? **It is clear that the policy has failed, the Authority currently has no 5-year land supply, if it ever really had one or will have in futures thanks to development prevention policies.**
- b. Would the requirement of a Community and Linguistic Statement to accompany a planning application for unanticipated windfall sites be unnecessarily onerous for development falling within this category? **Yes**

APPENDIX B

Ystadegau Allweddol i Wynedd

Dwysedd Poblogaeth - Wardiau

Diweddarnwyd Mai 2014

Cynhyrchir gan yr Uned Ymchwil a Gwybodaeth, Cyngor Gwynedd

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Ffynonellau: Amcangyfrifon poblogaeth arbrofol ardaloedd bychain SYG; Uned Ymchwil a Gwybodaeth, Cyngor Gwynedd

Deunydd Hawlfraint y Goron wedi'i atgynhyrchu a chaniatâd rheolwr HMSO ac Argraffydd y Frenhines i'r Alban. Rhif trwydded defnydd-clic C02W0000416

Key statistics for Gwynedd

Population Density - Wards

Last updated May 2014

Produced by the Research and Information Unit, Gwynedd Council.

Further information - phone 01286 679043

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Sources: ONS experimental small area population estimates; Research and Information Unit, Gwynedd Council

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	Arwynebedd (hectarau)	Arwynebedd (cilomedr sgwar)	Poblogaeth 2012	Person/ hectar	Person/ cilomedr sgwar
	Area (hectares)	Area (square kilometre)	Population 2012	Persons/ hectare	Persons/ square kilometre
Gwynedd	253,498	2,534.98	122,142	0.5	48
Arfon	40,815	408.15	60,746	1.5	149
Dwyfor	62,053	620.53	27,749	0.4	45
Meirionnydd	150,630	1,506.30	33,647	0.2	22
Aberdaron	4,769	47.69	1,040	0.2	22
Aberdovey	5,298	52.98	1,114	0.2	21
Abererch	2,489	24.89	1,351	0.5	54
Abermaw	1,600	16.00	2,422	1.5	151
Abersoch	582	5.82	711	1.2	122
Arlechswedd	8,168	81.68	1,400	0.2	17
Bala	242	2.42	2,006	8.3	829
Bethel	958	9.58	1,429	1.5	149
Bontnewydd	1,005	10.05	1,090	1.1	108
Botwnnog	3,427	34.27	962	0.3	28
Bowydd and Rhiw	2,603	26.03	1,808	0.7	69
Brithdir and Llanfachreth/Ganllwyd/Llanelltyd	19,590	195.90	1,448	0.1	7
Bryn-crug/Llanfihangel	10,858	108.58	1,008	0.1	9
Cadhant	213	2.13	2,083	9.8	978
Clynnog	4,551	45.51	990	0.2	22
Corris/Mawddwy	16,490	164.90	1,315	0.1	8
Criccieth	672	6.72	1,825	2.7	272
Cwm-y-Glo	1,383	13.83	984	0.7	71
Deiniol	53	0.53	1,757	33.2	3,315
Deiniolen	1,766	17.66	1,887	1.1	107
Dewi	110	1.10	1,917	17.4	1,743
Diffwys and Maenofferen	261	2.61	1,012	3.9	388
Dolbenmaen	8,609	86.09	1,240	0.1	14
Dolgellau North	3,262	32.62	1,183	0.4	36
Dolgellau South	239	2.39	1,553	6.5	650
Dyffryn Arduwy	4,555	45.55	1,701	0.4	37
Efail-newydd/Buan	5,571	55.71	1,277	0.2	23
Garth	49	0.49	850	17.3	1,735
Gerlan	263	2.63	2,223	8.5	845
Glyder	98	0.98	1,716	17.5	1,751
Groeslon	2,061	20.61	1,741	0.8	84
Harlech	5,854	58.54	2,007	0.3	34
Hendre	100	1.00	1,472	14.7	1,472
Hirael	34	0.34	1,450	42.6	4,265
Llanaelhaearn	4,810	48.10	1,609	0.3	33
Llanbedr	6,840	68.40	1,026	0.2	15
Llanbedrog	929	9.29	935	1.0	101
Llanberis	4,561	45.61	2,054	0.5	45
Llandderfel	19,761	197.61	1,448	0.1	7
Llanengan	2,780	27.80	1,093	0.4	39
Llangelynin	8,283	82.83	1,975	0.2	24
Llanllyfni	3,323	33.23	1,136	0.3	34
Llanrug	188	1.88	1,827	9.7	972
Llanuwchllyn	19,260	192.60	886	0.0	5
Llanwnda	1,573	15.73	1,937	1.2	123
Llanystumdwy	6,008	60.08	2,069	0.3	34
Marchog	105	1.05	2,607	24.8	2,483
Menai (Bangor)	100	1.00	3,106	31.1	3,106
Menai (Caernarfon)	253	2.53	2,170	8.6	858
Morfa Nefyn	1,012	10.12	1,340	1.3	132
Nefyn	511	5.11	1,335	2.6	261
Ogwen	126	1.26	2,477	19.7	1,966
Pebblig (Caernarfon)	101	1.01	2,325	23.0	2,302
Penisarwaun	1,379	13.79	1,840	1.3	133
Penrhyndeudraeth	4,141	41.41	2,409	0.6	58
Pentir	1,887	18.87	2,456	1.3	130
Penygroes	729	7.29	1,886	2.6	259
Porthmadog East	453	4.53	1,717	3.8	379
Porthmadog West	867	8.67	1,748	2.0	202
Porthmadog-Tremadog	9,924	99.24	1,318	0.1	13
Pwllheli North	381	3.81	2,054	5.4	539
Pwllheli South	155	1.55	1,887	12.2	1,217
Seiont	370	3.70	3,005	8.1	812
Talysarn	1,155	11.55	1,759	1.5	152
Teigl	2,835	28.35	1,986	0.7	70
Trawsfynydd	15,871	158.71	1,506	0.1	9
Tregarth & Mynydd Llandygai	2,792	27.92	2,210	0.8	79
Tudweiliog	3,553	35.53	788	0.2	22
Tywyn	2,787	27.87	3,272	1.2	117
Waunfawr	5,322	53.22	1,608	0.3	30
Y Felinheli	590	5.90	2,231	3.8	378