

**WELSH GOVERNMENT**

**Examination Hearing Statement**

**Anglesey and Gwynedd Joint Local  
Development Plan**

**Hearing Session 5: Economy – Employment,  
Retail and Tourism**

**13<sup>th</sup> September 2016**

## **(Session 5): Questions**

### **Employment**

- 3. Is the overall figure of 638.7ha of safeguarded employment land, with an additional 60ha of allocated land and 144.1ha Reserve Sites (842.8ha total) appropriate to meet the needs of the Counties over the Plan period?**

The Employment Land Review (July 2012) recommends that both authorities provide 6ha of employment land per annum up to 2026 (paragraph 6.10.1). This combined figure provides a need for 180ha of employment land over the plan period, which includes a 50% flexibility allowance. Policy CFY1 (as amended by DA016) allocates (a) 650.01ha of safeguarded employment sites of which 293.57ha is vacant (b) 55ha of new employment allocations and (c) 144.1ha of reserve sites associated with the Anglesey Energy Island Programme. The combined developable area of employment allocations total 492.67ha, which is a significant over-provision of 312.67ha. The authorities should explain how this over-provision relates to the Energy Island Programme, the proposed development at Wylfa Newydd and the employment land required to satisfy local need. Delivery of the employment allocations is essential to support the plan's strategy for economic growth and it is important that the market is not confused, nor land values lowered from the significant over-provision of employment land.

- a. Is the level of employment land provision fully justified and supported by robust evidence?**

This is a matter for the authorities. Please see our response to Question 3.

- b. How does the proposed level of employment land provision compare to historic take up rates, past population growth trends and an ageing population?**

This is a matter for the authorities.

The Employment Land Review (July 2012) identifies the historic take-up of employment land as approximately 3.97ha per annum in both Gwynedd and Anglesey Councils (paragraph 6.8). The ELR recommends that both authorities build in a 50% buffer to provide an enhanced offer, which increases land-take from 4ha per annum to 6ha per annum. This approach provides a total need for 180ha of employment land over the plan period. The Welsh Government does not object to the principle of this approach, which is consistent with other authorities across Wales and accords with TAN 23 to allow for flexibility, competition and choice (paragraph 4.5.2).

In accordance with our response to Question 1, the Welsh Government requires further clarification on the 312.67ha over-provision. TAN 23 identifies that a persistent oversupply of employment land may cause harm where the planned land supply exceeds demand, so that allocated employment sites remain vacant for long periods and frustrate development for other land uses (paragraph 4.5.2).

**4. Does the spatial distribution of employment land have regard to the Wales Spatial Plan and is it consistent with the overall development strategy proposed through the LDP?**

The Wales Spatial Plan (2008) identifies Anglesey and north Gwynedd as part of the North West Wales area. South Gwynedd is part of the mid-Wales area. A priority for North West Wales is to ensure the principal hub of Menai, which comprises the regions largest centres of population in Bangor, Caernarfon and Llangefni, function to the best of their potential and form the driving force for the regions growth. The two secondary hubs of Holyhead and Porthmadog-Pwllheli-Penrhyndeudraeth are recognised as key growth settlements with a focus on providing services and employment to spread prosperity to the rural hinterlands.

In accordance with the Wales Spatial Plan (2008), the Welsh Government does not object to the spatial distribution of employment allocations in Policy CYF1, as they broadly align with priorities for the North West Wales area.

**a. Is the Plan's overall approach to employment growth compatible with the levels of residential development proposed over the Plan period?**

This is a matter for the authorities.

The Welsh Government does not object to the approach for employment growth when compared against the level of housing provision in the plan. The enhanced need for 180ha of employment land, which includes a 50% flexibility allowance, is linked to the plans housing growth, which is also above the Welsh Government 2011-based household projections.

It is imperative the authorities can demonstrate the link between the housing requirement and wider economic prospects at Wylfa Newydd. It would not be appropriate for housing land supply to constrain the plans economic growth strategy.

**b. How are the economic and residential strategies aligned?**

This is a matter for the authorities.

To determine the spatial distribution of employment land, the Council's should confirm the settlement tier of reserve site C37: Former site of Shell, Rhosgoch, allocated for 82.2ha of employment land. Moreover, updated employment paper DA016 identifies the site as the "preferred option for the overspill of workers accommodation of up to 1,500 Wylfa Newydd construction workers" (Section 3). The Council should confirm the suitability of the site for employment purposes and its allocation in Policy CFY1.

Subject to the above, the Welsh Government does not object to the remaining spatial distribution of employment land. The distribution of both housing and employment growth is broadly consistent with the plans strategy to focus development in the Sub-regional, Urban Service and Local Service Centres. For ease of reference, allocation C37: Former site of Shell, Rhosgoch, has been omitted from the table below.

### **The Spatial Distribution of Housing and Employment Sites**

<b>Settlement Hierarchy</b>	<b>Housing (Units)</b>	<b>Percentage</b>	<b>Employment (Hectares)</b>	<b>Percentage</b>
Sub-regional/Urban Service	4,346	Up to 55%	316.37ha	77%
Local Service	1,580	At least 20%	77.8ha	19%
Villages	1,502	No more than 25%	6ha	1%
Clusters	224		-	
Open Countryside	250		10.3ha	3%

- c. Is the hierarchy of employment sites appropriate? Is the Plan's approach to employment land provision in rural areas consistent with Planning Policy Wales, Technical Advice Note 6 and Technical Advice Note 23?**

Please see our response to Question 4b on the hierarchy of employment sites.

In accordance with TAN 6, local planning authorities in rural areas should use a sequential approach when identifying land for economic uses in development plans (paragraph 3.1.2). The authorities should clarify if this approach has been undertaken, particularly in respect of Anglesey.

- d. Is the Plan's employment land strategy compatible with the emerging strategies of neighbouring authorities, for example, the potential influence of Trawsfynydd and Llanbedr Airfield?**

This is a matter for the authorities.

TAN 23 recognises that market forces do not respect local authority boundaries and this means that strategic planning, larger than local planning authorities, for economic development is essential (paragraph 1.3.1). The authorities should be able to demonstrate how the employment land strategies of neighbouring authorities have been accounted for.

**5. Do the safeguarded and allocated sites meet the different economic and employment needs of the area and how deliverable are they over the Plan period?**

The Employment Land Review (2012) identifies an existing over supply of 152.4ha of employment land (Table 8.1 and Table 8.2) for Class B1 and B8 uses. The authorities should explain why they have allocated new sites and sought to protect a large number of existing sites for B1 and B8 uses given the areas significant over-supply and high vacancy rates. A persistent oversupply may cause harm when allocated sites remain vacant for long periods and could frustrate development for alternative uses (TAN 23).

The identified need for 180ha of employment land will be met in Policy CFY1 through allocations totalling 55ha and safeguarded sites whose vacant land area is 293.57ha (DA016). To improve clarity and align with other adopted plans across Wales, the authorities should consider separating existing Policy CFY1 for:

1. A new safeguarding policy that identifies and protects key existing employment sites;
2. An allocations policy that meets the identified need for 180ha of employment land and,
3. A new policy for the development at Wylfa Newydd and the reserve employment sites.

This approach will ensure the development of all employment land accords with the spatial strategy.

The Employment Land Review 2012 (Tables 9.1 and 9.2) provides observations on the delivery of safeguarded and allocated employment land with many sites highlighted for further feasibility work to determine their deliverability and viability. The Council's Site Deliverability Report (DA015) does not include information on the infrastructure requirements, costs and funding mechanisms to deliver these sites, particularly strategic regional employment allocations C14: Land to the north of Lledwigan Farm and C15: Land in the Creamery. Both sites have no current infrastructure and a new access point would be needed to service the

sites (Employment Land Review, 2012 Appendix 9). The Council's should ensure that funding mechanisms are identified for all employment allocations to deliver on the plans strategy for economic growth.

**a. Are the safeguarded sites and allocations realistic and economically viable?**

Please see our response to Question 5 on economic viability.

The Employment Land Review 2012 (Tables 9.1 and 9.2) lists the new portfolio of employment sites for inclusion in the plan. Clarification is required on allocations C39: Griffin Industrial Estate, C29: Llwyn Onn Industrial Estate and C10: Adjacent to the Petrol Station, which do not appear in the evidenced portfolio of new sites yet are listed in allocating Policy CYF1.

The Council's should ensure that all vacant land on the safeguarded sites is capable of development in order to meet the identified need. Clarification is required on the suitability of sites C32: Kingsland and C19: Peblig, both of which have been identified in the Employment Land Review (2012) as suitable for residential development (Appendix 9). Why are they retained for employment uses? Moreover, the vacant area of site C16: Hirael Bay should be amended from 6.72ha to 1ha for B1 uses to accord with the findings in the Employment Land Review 2012 (Appendix 9). The authorities should consider if the safeguarded sites were designated to meet a previous need and the implication on their delivery in the current plan period.

**b. Are there any constraints that could have an effect on the deliverability of sites over the Plan period?**

Please see the response to Question 5 and 5a.

**c. What are the timescale for anticipated delivery?**

This is a matter for the authority.

**6. How does the employment land strategy relate to the Anglesey Energy Island programme? What would trigger the release of the land designated as 'reserve sites' for the Anglesey Energy Island programme and what mechanisms would be in place to resist these sites being developed early in the Plan period?**

This is a matter for the authority.

**7. Does the Plan incorporate robust monitoring and review mechanisms that would enable the economic and employment strategy to respond effectively to changing circumstances?**

The updated monitoring framework (DA010c) should include targets (ha) for the take-up of allocated employment sites and new indicators on job creation and development at Wylfa Newydd. The Welsh Government will work with the authorities to improve the monitoring framework.

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