

Hearing Session 1**PLAN PREPARATION, VISION, OBJECTIVES & SPATIAL STRATEGY****Matters & Issues Agenda**

3 Has the Plan been prepared in accordance with the necessary procedural requirements?

c. Has the Plan been informed by a robust consideration of reasonable alternatives?

4 Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2026?

5 Are the Plan's objectives SMART and capable of delivering on the identified Vision?

6 Is the spatial strategy consistent/compatible with:

a. the Wales Spatial Plan?

The HBF do not consider that the strategy to spread development so widely across the authorities with the heavy reliance on settlements outside of the Sub-regional Centres & Urban Service Centres accords fully with the principles of the Wales Spatial Plan.

b. regional plans and strategies?

c. the plans/strategies of neighbouring authorities?

d. Does the Plan reflect the strategies and proposals of infrastructure providers?

7 Is the approach to site selection sufficiently clear and transparent and is it founded on a robust evidence base?

8 Does the Spatial Strategy, including the Settlement Hierarchy, represent an appropriate strategy for delivering growth over the Plan period?

The HBF are concerned that not enough of the proposed housing is planned to be provided in the Sub-regional Centre & Urban Service Centres. It is considered that these locations are the most sustainable, offer the best links to future employment growth and have the greatest range of existing facilities.

Table 2 of the plan indicates the split of units across the settlements, from this it can be seen that 3,306 units (46%) are to be delivered across 219 settlements with a further 250 units in open countryside. Although it is noted that the Council suggest that this mimics the existing spread of population across the authorities, the HBF would suggest that this is not the way to plan for sustainable growth in the future.

a. Does the Plan's Spatial Strategy represent a sustainable approach to planning, including in terms of transportation, over the Plan period? Would the Plan's Strategy deliver the identified Vision and Objectives?

Further to the comments above the strategy to locate a substantial level of development outside of the Sub-regional Centre & Urban Service Centres is likely to result in increased vehicular movements between new developments, key facilities (such as schools and large shops) and employment opportunities residents will require. The HBF do not consider this to be sustainable,

particularly noting the identified increase in single person households who are likely to be more reliant on public transport.

b. How has the Spatial Strategy been informed by the findings of local housing market assessments?

The HBF note that the LDP strategy is based on the joint North West Wales LMA 2008 and does not appear to have been influenced by more recent work.

c. Is the level of growth within the lower tier settlements (villages and clusters) justified?

The HBF believe that growth in these lower tier settlements is being relied on to heavily and as already suggested is a less sustainable way to grow development in the future.

d. Does the Spatial Strategy effectively link employment and residential growth?

The plan identifies a number of significant employment opportunities including WG supported enterprise zones, it also identifies that the proposed housing provision does take some account of economic growth aspirations. However it is not clear if the allocation of housing sites has specifically been linked to these employment opportunities. The HBF would suggest that a more sustainable approach to future development would be to consider linking allocated employment opportunities with housing allocations more closely.

e. Does the Strategy maximise the use of previously developed land and adopt the sequential approach to the release of land as set out in Planning Policy Wales?

The HBF note that the plan has a heavy reliance on windfall sites which are often brown field sites, the supporting documents also refer to the limited number of brown field sites in many areas of the plan. Accordingly the HBF consider that the plan has maximised the use of previously developed land.

f. Is the Plan's Spatial Strategy and policy framework consistent with national policy relating to Flood Risk?

g. Does the Plan's Spatial Strategy successfully translate national policy in relation to the best and most versatile agricultural Land to the local level?

9 Does the Plan's strategy adequately safeguard the interests of the Welsh language?

10 Is the Plan's Strategy deliverable?

a. Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites, including in terms of sewerage capacity?

The HBF note that WW have objected to a large number of sites in the plan and to various policies on the basis of their being insufficient capacity in their treatment plants. In terms of site deliverability it would be helpful to understand how and when WW intend to bring the necessary improvements forward and how many of these improvements are likely to be funded by WW.

b. Are the allocated sites based on robust site assessment methodology that takes into account potential constraints?

The HBF have raised concerns previously that the plan is too reliant on sites which have been 'rolled over from the UDP or have been previously consented'. These concerns have not been answered in the Councils response, suggesting that the sites suitability has only been assessed against the plans strategy, rather than the actually deliverability of the site. These sites will have been allocated as a result of the previous plans (UDP) strategy which stated:

1.3.8 Through the Unitary Development Plan the aim is control these tendencies by restricting development in settlements which have seen a significant level of development in recent years, whilst providing more opportunities in other settlements which have suffered deterioration.

Further it states:

1.3.12 Eight Dependency Catchment Areas (DCA) have been established as the basis of the spatial strategy for guiding development and addressing existing issues and conditions.

It appears that the previous plan allocated its sites using a different strategy to that now proposed which further adds to the concern over the reliance on previously allocated sites which have not been delivered to date.

c. Are policies PS2 and ISA1 based on a robust evidence base?

Policy PS2 is written in a way that suggest that all new development will be 'expected' to pay S106 contributions. However it is a basis of the planning system that each application should be treated on its own merits, further it will be required to pass the statutory tests for a S106/CIL. There is no evidence to suggest that all development will require a S106 contribution.

In terms of policy ISA1 the HBF would suggest that confusion is caused by the similarity with policy PS2. Both policies refer to Infrastructure in the heading of the policy. The term infrastructure usually relates to highways and services such as water, waste water, gas electric and broadband all required for development to take place [Dictionary definition -The basic physical and organizational structures and facilities (e.g. buildings, roads, power supplies) needed for the operation of a society or enterprise]. All the other items in the long list are more local facilities which may need to be provided to cater for the development depending on its size and the level of existing provision, referred to as 'community infrastructure' in the Councils Topic paper 13. This paper breaks infrastructure down into three categories fundamental, necessary and preferred this division may be helpful for a rewording of this policy.

Within policy ISA1 it refers to infrastructure that is not provided by a service or infrastructure company but then goes on to list Broadband and Utilities in the list of possible contributions, this seems to be a contradiction.

11 Is the Plan's Strategy sufficiently flexible to respond to changing circumstances?

a. Can the Plan respond effectively to changes in the Wylfa Newydd project?

12 Does the Plan provide robust mechanisms for the Monitoring and Implementation of the Plan's Strategy?

13 Any other matters.