



Llinos Quelch
Policy and Forward Planning
Ceredigion County Council
Penmorfa
Aberaeron
Ceredigion
SA46 0PA

Eich cyf : Your ref
Ein cyf : Our ref A-PP030-02-007
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Dear Llinos,

**CEREDIGION LOCAL DEVELOPMENT PLAN:
REGULATION 15 PRE-DEPOSIT (PREFERRED STRATEGY) CONSULTATION
WELSH ASSEMBLY GOVERNMENT RESPONSE**

Thank you for consulting the Welsh Assembly Government regarding the Ceredigion Local Development Plan (LDP) pre-deposit documents.

Having considered all the submitted documentation provided at the Regulation 15 stage, I would like to take this opportunity to acknowledge both the amount of work undertaken by the authority and the commitment from both officers and elected Members in progressing the plan. Continued progress to achieve an adopted plan to steer and influence development over the next 10 to 15 years will assist your authority in maximising the opportunities and benefits to the community as a whole. I would encourage you to maintain your current momentum.

As always, we recommend that you seek your own legal advice to ensure that you have met all the procedural requirements, including screening for Strategic Environmental Assessment (SEA) as responsibility for these matters rests with your Council.

Local Development Plan Wales (2005) and the accompanying Manual set out the key aspects that a Regulation 15 document (pre-deposit LDP) should contain including: strategic options; preferred strategy; key policies and initial sustainability appraisal report. The pre-deposit LDP should explain how and why the preferred strategy has been chosen from the options considered. The strategic policies should then aim to deliver the objectives, formed from the issues identified through the evidence base. The document should broadly indicate policy coverage, but not be site specific. The



plan should therefore be the tool to deliver the vision expressed in the LDP. Linkages between the strategy, policies and the evidence base need to be clear.

We have previously provided informal responses to emerging drafts of the Regulation 15 document. The strategic comments below have been raised in previous correspondence/meetings. As noted the style, format and succinctness of the final LDP deposit document are important as is the deliverability of the plan proposals. The plan must add value and contribute to shaping sustainable and locally distinct places. Issues raised by the Inspector in respect of the stopped UDP should be addressed.

With regard to style and format, I personally wish to express my support for producing a clear and well structured plan, focusing on the key aspects required and not replicating national planning policy. If this approach could be maintained, whilst incorporating the suggestions outlined below, there is a great opportunity to embrace the ethos of the new LDP system.

Whilst it will be for the appointed Planning Inspector to consider the 'soundness' of the plan, there are currently some areas requiring further consideration that need to be addressed before a Deposit Plan is published to ensure that the plan is considered sound. Hopefully this only requires a more overt explanation of the technical work undertaken to date. The substantive strategic issues are:

- Reasons have been advanced for the local approach being taken to **population forecasting** but at examination the authority will need to be able to support and justify differences from nationally based county estimates to show the plan is soundly based. The emerging Local Housing Market Assessment (Draft 2009) will assist the process of determining levels of housing provision.
- Although there is an appendix and background paper regarding the identification of **service centres** the rationale for the final choice of centres and catchments will need to be made clearer to support the deposit plan. The justification in terms of functionality for some selections particularly those near urban centres or ones with very small catchments/groupings will need to be fully detailed (6 urban Centres, 42 Urban Linked Settlements, 23 Rural Service Centres and 78 Rural Linked Settlements).
- The preferred strategy indicates that the **distribution of development** between types of centre will be such as to sustain the pattern of dispersed rural communities in the county as well as the main towns. A commensurate split of development between urban and rural areas is proposed but the strategy does not make explicit the **justification** for the proportions suggested nor explain the **direction of travel** in relation how they relate to the past/current position.
- There are hints in the strategy and background material as to how the main housing growth distribution between types of centre might be allocated to the individual service centres but it is disappointing that this has not been developed into indicative proposals. Without some indication as to the likely level of proposed development in the urban and rural service centres it is difficult to appreciate the implications of the strategy. Further clarification and appropriate justification of the basis for **distribution to the service centre** level will be needed.
- Background material makes reference to the **functions, opportunities and constraints** apparent in the urban and some rural centres but this is not explored further in the strategy to identify strategy implications for particular settlements and localities.

- The principle of identifying a proportionate split of growth between 'urban and rural centres' to indicate the general pattern of support for these types of settlement is appreciated. However, the additional split for '**linked settlements**' tends to confuse the strategy. It might be clearer if the initial distribution was limited to the two types of service centres (with the linked settlement share included). Some strategic guidance on the indicative split expected within the service centre areas between the main settlement and the linked settlements could then be given. A more detailed centre by centre assessment of the actual local pattern in each case will be needed to support the deposit plan proposals. The overall proportion of development that might occur in linked settlements as a consequence of the strategy is clearly of interest in setting out its implications but it is difficult to see how such an overall proportion for linked settlements can be established and justified in advance.
- The **affordable housing** target appears modest in relation to the indicated demand. If the plan target (700 units) does not match demand (2,040 units) it should demonstrate that it is optimising from all sites. The Local Housing Market Assessment will be a key part of the evidence base. Viability testing in broad terms will play an important role in evidencing delivery. The deposit plan will need to ensure that the target adopted can be fully justified in terms of dealing adequately with a key issue/objective whilst also being achievable.
- **National policy** requirements in relation to local development plan coverage of minerals, waste, gypsy sites, flood risk, best and most versatile agricultural land, renewable energy etc should be fully covered in the deposit plan details. Specifically, the 140Mw identified in TAN8 for strategic search area D should not be considered as a limiting target as advances in technology may enable higher values to be realised. Flood risk should be an integral part of the strategy/option formulation, as well as specific site allocation, to address both fluvial and coastal risks. Provision for gypsy sites, both permanent and transient, as well as a criterion based policy should be developed for the deposit plan, based on need.
- The preferred strategy and background material refers to **infrastructure** issues and constraints. It is vital that this aspect is explored fully for the deposit plan so that it can be shown that the plan can be **delivered**. The ability of the plan to respond in a **flexible** manner to potential difficulties will need to be demonstrated and in particular its robustness e.g. uncertainty on Capel Bangor employment site should be addressed.
- The deposit plan will also need to consider fully the **phasing** and release of development at the service centre level both in relation to the availability of infrastructure and also the level of commitments in each area.
- The support the plan strategy provides for rural communities at a broad strategic level by focusing development on specific rural service centres is acknowledged. However the deposit plan must avoid encouraging **development in the open countryside**, in too many poorly located sporadic infill locations and over allocating or drawing extensive settlement boundaries in rural centres so that the balanced pattern of development proposed could be prejudiced and there would be damage to the character of the rural landscape.
- The status of proposals contained in various informal key settlement **Masterplans and Employment and Regeneration Strategies** should be clarified and if appropriate, should be incorporated into the deposit plan.

The annex to this letter sets out the detailed comments of the Assembly Government on the Preferred Strategy document; some comments relate to more than one test of soundness and we have provided cross-references where most appropriate.

With regard to moving the LDP process forward, the Welsh Assembly Government does not wish to delay the authority or impede its progress. Providing the data exists and technical analysis has been undertaken where apparent gaps in the justification/evidence base have been identified, we believe that much of this advice can be accommodated by refining and including emerging material into the deposit plan and its supporting documentation. This will provide the authority with the necessary audit trail on how evidence has influenced the strategic options and ultimately the preferred strategy. This should not delay deposit plan preparation and should improve the prospects of the plan being deemed sound.

To assist the authority in taking forward the LDP, we would consider it prudent that we meet your officers to discuss our response as soon as possible. Could you therefore call Heledd Cressey on 01492 542108 to arrange a suitable date for a meeting.

Yours sincerely

Mark Newey

Joint Head of Plans, Management and Performance Branch
Planning Division