

# LDP Ceredigion

**Local Development Plan  
2007 - 2022**

## **Review Report**



Cyngor Sir  
**CEREDIGION**  
County Council

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## 1. Introduction

- 1.1 The adopted Ceredigion Local Development Plan (LDP) sets out the Council's priorities for the development and use of land in the County and its policies, to implement over the fifteen year plan period between 2007 and 2022. The LDP was adopted on 25th April 2013 and, in accordance with statutory requirements, has subsequently been monitored on an annual basis with the publication of three Annual Monitoring Reports (AMRs) to date, with a fourth currently in preparation. Each AMR assesses the extent to which the LDP strategy, policies and development sites are being delivered.
- 1.2 Up-to-date LDPs are an essential part of a plan-led planning system and in order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council must undertake a full review of the adopted LDP at intervals not longer than 4 years from adoption<sup>1</sup>. Consequently, a review of the adopted Ceredigion LDP was triggered on 31<sup>st</sup> Oct 2016<sup>2</sup> conclude with adoption of the Replacement Plan.
- 1.3 This Review Report sets out the extent of changes required to the LDP and the revision procedure to be followed. The recommended changes have been informed by the findings of preceding AMRs, updates to the evidence base and ongoing surveys<sup>3</sup>.
- 1.4 When preparing or revising a Local Development Plan the Local Planning Authority must ensure that the Plan is prepared correctly and it meets the 3 tests of soundness<sup>4</sup>:
- Does the Plan fit? (i.e. is it clear that the Plan is consistent with other Plans?)
  - Is the plan appropriate? (i.e. is the plan appropriate for the area in light of the evidence?)
  - Will the Plan deliver? (i.e. is it likely to be effective?)
  - Where change is identified the reasons for it include reference to the most pertinent soundness test/s that has informed the need for change<sup>5</sup>.
- 1.5 Section 2 provides a brief overview of the most recent AMR (published in October 2016) and highlights the aspects of the Plan that are not working or not progressing towards their stated objectives.
- 1.6 Section 3 reviews the LDP Vision in the context of its relationship with the Council's Single Integrated Plan<sup>6</sup> (SIP) 'Ceredigion for All 2013-2017'. A

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<sup>1</sup> Sooner should monitoring identify significant concerns

<sup>2</sup> with the submission of AMR 3

<sup>3</sup> Ongoing surveys relate to the statutory obligation under section 61 of the Planning and Compulsory Purchase Act 2004, which requires the Council to keep under review matters affecting development within its area.

<sup>4</sup> In order to be adopted, a Local Development Plan must be determined 'sound' by the independent examination Inspector (Section 64 of the 2004 Planning and Compulsory Purchase Act). Tests of soundness and checks are identified in Planning Policy Wales Edition 8, January 2016, Chapter 2 and the Local Development Plan Manual Chapter 8.

<sup>5</sup> Local Development Plan Manual Edition 2 August 2015:

<http://gov.wales/topics/planning/development-plans/localdevelopmentplans/?skip=1&lang=en>

comparison is also made with the well-being goals arising from the Well-being of Future Generations Act (2015) and the Public Services Board Local Well-being Plan<sup>7</sup> which is currently being prepared and due to be published by the 1/4/18. In both cases, a conclusion is made on whether the LDP's Vision should be revised in order to improve policy integration.

- 1.7 Section 4 reviews the LDP's Key issues and Vision and Strategic Objectives. The Key issues are considered against the most recent population statistics prepared by the Welsh Government, the priority outcomes of the SIP and the draft local well-being goals. The Vision and Strategic Objectives are only assessed against the priority outcomes of the SIP and the well-being goals.
- 1.8 Section 5 reviews the LDP's Strategy and focuses on the key components of population, housing, affordable housing and employment. Each component is considered separately, with consideration given to whether the Strategy is currently being delivered and the reasons for the current situation. A view is also provided on whether the current strategy should be rolled forward and for how long (assuming a new plan period that commences in 2017) or whether the strategy should be reconsidered in whole or part for each section.
- 1.9 Section 6 provides a general review of LDP policies based on the findings of previous AMRs and evidence of significant contextual changes<sup>8</sup>. Relevant policies are considered under their respective topic headings and recommendations for revision are made where necessary.
- 1.10 Section 7 provides an overview of the monitoring of the sustainability objectives and highlights the changes to the environmental baseline and plans, policies and programmes since the work was originally started in 2007.
- 1.11 Section 8 addresses the issue of preparing a joint plan with neighbouring authorities. This is undertaken within the context of the Welsh Government's preference for all Local Authorities to consider ways in which they can work together more effectively.
- 1.12 Section 9 concludes on the overall findings of the previous sections and recommends the revision procedure to be followed in preparing a replacement LDP. Finally, the Report sets out the next steps in preparing a replacement Local Development Plan.
- 1.13 Any proposed change in policy will be subject to public consultation in compliance with national policy, guidance and regulation. Policies can be ultimately added, amended or deleted from the Plan by the appointed Inspector.

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<sup>6</sup> This ends in 2017 but the successor Plan the PSB Local Wellbeing Plan will not be in place prior to publication of this Review Report.

<sup>7</sup> March 2017

<sup>8</sup> note that housing and employment policies are not included in this section as they were reviewed as part of the Strategy in Section 5.

- 1.14 The Authority will follow the advice provided in the most recent version of section 2.8 of Planning Policy Wales (current edition 9 November 2016) when considering the status of the emerging replacement Plan.

## 2. Findings of Annual Monitoring Reports

- 2.1 National guidance set out in the Local Development Plan Manual (Edition 2, August 2015) states that a plan review should, amongst other things, draw on the findings of published AMRs. The most recent AMR (AMR 3), published in October 2016, covers the period from 1st April 2015 to 31st March 2016.
- 2.2 Whilst the implementation of the Plan has been successful in a number of key areas, with a change in the right direction, there are certain aspects of the Plan that are not progressing towards their stated objectives at the pace anticipated by the Plan. The most recent AMR identifies the following areas of concern:
- The overall soundness of the Strategy and the potential for rolling forward the plan's strategy to be delivered over a longer period of time;
  - The amount, supply, location of and deliverability of allocated sites and specifically the failure to provide for the Welsh Government requirement of a five year supply of readily available housing land;
  - The status of some settlements;
  - Infrastructure (particularly Transport & Sewerage) capacity to enable sites to come forward;
  - Local Biodiversity indicators and the way in which internal consultation is managed.
- 2.3 With the exception of local biodiversity indicators, all of the above indicators are concerned with the fact the LDP's development allocations are not coming forward at the rate anticipated, and this points to a need to find ways of facilitating development to speed up the pace of change to address problems associated with the economic climate. The lower than anticipated levels of housing delivery in Urban Service Centres (USC) and Rural Service Centres (RSC) are significant contributing factors that call out for change to identify measures to achieve more development in the USC, rather than reducing the scope for delivery in the more rural areas. Further, whilst the AMR identifies a reduction in the number of service centres being partly constrained by infrastructure capacity issues, with only 4 being partly constrained compared to 9 at plan adoption in 2013, site specific infrastructure and sewerage concerns continue to be raised at planning applications stage. Liaison with service providers will be undertaken to ensure all allocations brought forward in a replacement plan are appropriate and deliverable. The Replacement Plan needs to consider how best to discount those approximately 1500 outstanding consents many of which have been extant for years. Strategy options will need to be considered in more detail at pre-deposit stage: continuing with the current strategy to be considered alongside minor changes and more fundamental change options, taking into account significant contextual changes and deliverability.
- 2.4 The Local Biodiversity indicators have been triggered because more than 5% of development permitted is predicted to have significant residual long term or unknown effects on the environment and local biodiversity. This failing is due to the policy implementation process and not policy wording. Therefore whilst the policy itself does not raise concerns, its implementation will require review, with appropriate actions to be proposed to address these issues. Further, it is



highlighted that considerable improvement (20%) has been achieved in regard to environmental enhancements. The 2016 AMR explores these concerns in greater detail.

### 3. Vision

- 3.1 The vision of the LDP provides a clear view of what kind of place the County should become in the future, and it is essential that it remains relevant to local needs and aspirations beyond the current plan period (2007 to 2022). The LDP vision was developed through a partnership approach and was informed by a range of plans and strategies. The Vision states that:

**From the Cambrian Mountains to Cardigan Bay, Ceredigion will remain a scenic and biodiversity rich county, committed to maintaining, enhancing and benefiting from its beautiful coastline, uplands and river valleys.**

**It will be home to a vibrant network of engaged and bilingual communities, both urban and rural, whose residents enjoy good health and wellbeing. These communities will celebrate their cultural heritage, and influence and embrace change to meet 21st Century challenges, including climate change. By supporting and enhancing the County's urban and rural service centres, their inter-relationship will be strengthened, the necessity to travel will be reduced and access to local and sustainable facilities will be enhanced and secured.**

**Through sustainable development and protection of its resources, Ceredigion will also be recognised for its enhanced environment and will provide and ensure appropriate and high quality housing and a strong, diverse and progressive economy.**

- 3.2 The relationship between the LDP and the Single Integrated Plan (SIP) is particularly important as the latter provides the overarching strategic policy framework for the County. National guidance states that LDPs should complement SIPs by providing the land use expression of the shared vision of how an area will change.<sup>9</sup>
- 3.3 The most recent SIP for Ceredigion 'Ceredigion for all' (revised and approved by the Local Service Board on 1<sup>st</sup> October 2015) contained the following vision:
- 3.4 "The people of Ceredigion are proud to belong to a community which is bilingual, sustainable, healthy, thriving and safe"
- 3.5 The SIP vision was also supported by the guiding principles which resulted in 3 main outcomes to concentrate on in the coming years:
- Supporting Families
    - Families in Ceredigion have the opportunity to thrive and reach their potential;
  - Economy and Place
    - People in Ceredigion have the skills and support to secure employment;
    - Ceredigion's communities are resilient and its natural environments are valued;

<sup>9</sup> Paragraph 5.2.3.1 of the Local Development Plan Manual Edition 2 (August 2015).

- Independent Living
  - People in Ceredigion live in safe and affordable homes and communities;
  - People in Ceredigion are able to live fulfilled lives.

3.6 It should be noted that the SIP will shortly be replaced by a Local Well-being Plan (LWP), a requirement of the Well-being of Future Generations (Wales) Act 2015. The Act places a duty on public bodies, including local authorities, to carry out sustainable development and to set objectives which maximise contribution to achieving each of the seven well-being goals. Each public body must take all reasonable steps, in exercising its function, to meet those objectives. The Act also establishes Public Service Boards (PSB) for each local authority area in Wales which must improve economic, social, environmental and cultural well-being of the local area by working to achieve the well-being goals. Individual local authorities are responsible for preparing and publishing the PSB's LWP by 1<sup>st</sup> of April 2018 which will set out the Board's objectives and the steps it will take to meet them.

3.7 Whilst the LWP for the County is at an early stage of development, an in house assessment was undertaken to establish the extent to which the LDP Vision contributes to the achievement of the well-being goals. This concluded that the LDP Vision generally aligns well with and recognises the 7 well-being goals, but its contribution could be strengthened towards some of the well-being goals. The review of the plan will see a revised vision and objectives to secure closer alignment between the LDP and the national well-being goals. As the emergent LWP progresses towards adoption<sup>10</sup> the LDP Review will need to ensure appropriate revision of the Vision and objectives to secure complementarity with the LWP, recognising that in identifying high level priorities for collaborative public sector action, the LWP may be silent on aspects pertinent to the LDP.

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<sup>10</sup> Anticipated March 2018

## 4. Key Issues and Strategic Objectives

### Key Issues

4.1 The LDP identified Key Issues within seven themes:

1. **Level and type of growth**
2. **Distribution of growth/development**
3. **Form of growth**
4. **Community**
5. **Welsh Language**
6. **Environment and Climate Change**
7. **Infrastructure and Services**

4.2 These Key Issues remain relevant for the LDP currently and for the future, through Plan review, in determining how the Council plans for growth and in terms of the issues identified in AMR 3.

### Objectives

4.3 The LDP sets out 18 objectives covering social, economic, environmental and cultural matters. The objectives of the LDP have been assessed against the well-being goals in house, and it is been found that they contribute to the achievement of several of the well-being goals, namely “A prosperous Wales”, “A Wales of cohesive communities”, “A Wales of vibrant cultures and thriving Welsh Language” and “A globally responsible Wales”. Consideration should therefore be given to how revised objectives could better align with the Well-being of Future Generations (Wales) Act 2015 and make a greater contribution to the priority outcomes globally, nationally, regionally and locally, including those identified in the emerging LWP.

## 5. Review Engagement

- 5.1 Since plan adoption, as part of implementation and monitoring, the Planning Policy Team has engaged with the stakeholders identified in Table 1

**Table 1: Overview of Engagement with Others;**

With Whom?	How?
Ceredigion County Council Members <ul style="list-style-type: none"> <li>• LDP Working Group</li> <li>• Development Control Committee</li> <li>• All members briefing</li> <li>• Scrutiny Committee outcomes on specific topics</li> <li>• Cabinet</li> <li>• Council</li> </ul>	<ul style="list-style-type: none"> <li>• To inform AMR preparation, evidence base preparation, emerging recommendations on aspects of draft Review Report and draft Revision Delivery Agreement</li> </ul>
Ceredigion County Council Officers <ul style="list-style-type: none"> <li>• Development Management;</li> <li>• Leadership Group,</li> <li>• Other relevant Technical Officers (eg Housing, Highways, Ecology, Rights of Way, Regeneration)</li> </ul>	LDP Working Group <ul style="list-style-type: none"> <li>• Direct contact with relevant officers<sup>11</sup> for factual updates</li> <li>• Officer meetings</li> <li>• Peer review of evidence base including topic paper updates</li> <li>• Opportunity to comment on draft Review Report</li> </ul>
Natural Resources Wales	<ul style="list-style-type: none"> <li>• Direct contact with relevant officers for factual updates</li> <li>• Officer meetings</li> <li>• Technical review of evidence base</li> </ul>
Dŵr Cymru / Welsh Water	<ul style="list-style-type: none"> <li>• Direct contact with relevant officers for factual updates</li> <li>• Response to DC/WW Asset Management Plan consultations</li> </ul>
Regional Minerals and Waste Planning Groups	<ul style="list-style-type: none"> <li>• Direct contact with relevant officers for factual updates</li> <li>• Officer meetings</li> <li>• Technical review of evidence base</li> </ul>
Neighbouring Local Planning Authorities	<ul style="list-style-type: none"> <li>• Peer review of updated evidence base</li> <li>• Collaborative working on matters of regional significance and on common</li> </ul>

<sup>11</sup> This includes Officers with responsibilities for: Development Planning, Highway Authority, Economic Development, Housing, Drainage and Coastal Defences, Community Facilities, Waste.

	approaches to evidence preparation.
Town and Community Councils	<ul style="list-style-type: none"> <li>• Correspondence as and when required</li> <li>• Direct contact with relevant officers for factual updates</li> </ul>
Landowners and Agents of sites designated for development	<ul style="list-style-type: none"> <li>• Meetings, correspondence and phone calls to discuss progress with site delivery.</li> <li>• Annual progress update for JHLAS survey</li> <li>• 'Pre-app' policy advice on request</li> </ul>
Joint Housing Land Availability Study Group Members (eg Home Builders Federation, DCWW, NRW, RSL representatives)	<ul style="list-style-type: none"> <li>• Annually, on allocated housing sites and sites of more than 5 units;</li> </ul>
Stakeholder Engagement / Awareness Raising	<ul style="list-style-type: none"> <li>• Members of PSB have been briefed on the review</li> <li>• Input sought from relevant PSB executive groups on draft review report</li> <li>• Engagement with developers on specific Evidence base updates, including the Strategic Viability Assessment process, Retail Capacity Study and Employment Land review</li> <li>• Review issues have been discussed and presented to members of the Growing Mid Wales team.</li> <li>• Engagement on preparation of Local Housing Market Assessment (LHMA) and Gypsy Traveller Accommodation Needs Assessment.</li> </ul>
The General Public	<ul style="list-style-type: none"> <li>• Notice of adoption;</li> <li>• Formal public consultation on draft supplementary planning guidance;</li> <li>• Publication of each Annual Monitoring Report</li> <li>• Awareness raising of the need for Review</li> </ul>

5.2 Consultation on the LDP Review Report and draft replacement Plan Delivery Agreement was undertaken across a six week period between 2nd November and 15th December 2017. Responses were considered by Council on 24th January 2018 and, as a result, minor changes have been incorporated into this Review Report and the Summary of representations received and agreed Council Position has been attached as an appendix.

5.3 Specific reference is noted to the following topics for consideration in preparation of the replacement plan:

- open space through planning;
- Joint working on cross border matters;

- Non statutory, more localised Place Plans, as considerations in progressing and delivering the replacement plan;
- Savings to be achieved by joint working on evidence base alongside co-operation with all neighbouring authorities on cross boundary matters;
- Housing delivery
- Infrastructure provision
- Deliverability;
- Settlement Strategy
- The Sustainability of developing in Service Centres
- Increasing the percentage of affordable housing
- Student housing provision and the relationship with general housing;
- Affordable Housing;
- Housing to meet local needs
- Availability of small scale local housing
- Sustainability of rural settlements
- Live/ Work ventures
- Welsh language policies
- Impacts of Development and in-migration on Welsh Communities
- Tourism and Landscape / environmental capacity;
- Renewable energy;

## 6. Review Themes and Risks

6.1 Following stakeholder engagement and evidence base review, the review themes below have been identified. Further detail on these themes is provided in the following sections.

**Diagram 1: Review Themes**





## 6.2 Risks identified that will might impact on Plan Revision.

**Table 2 Identified Risks**

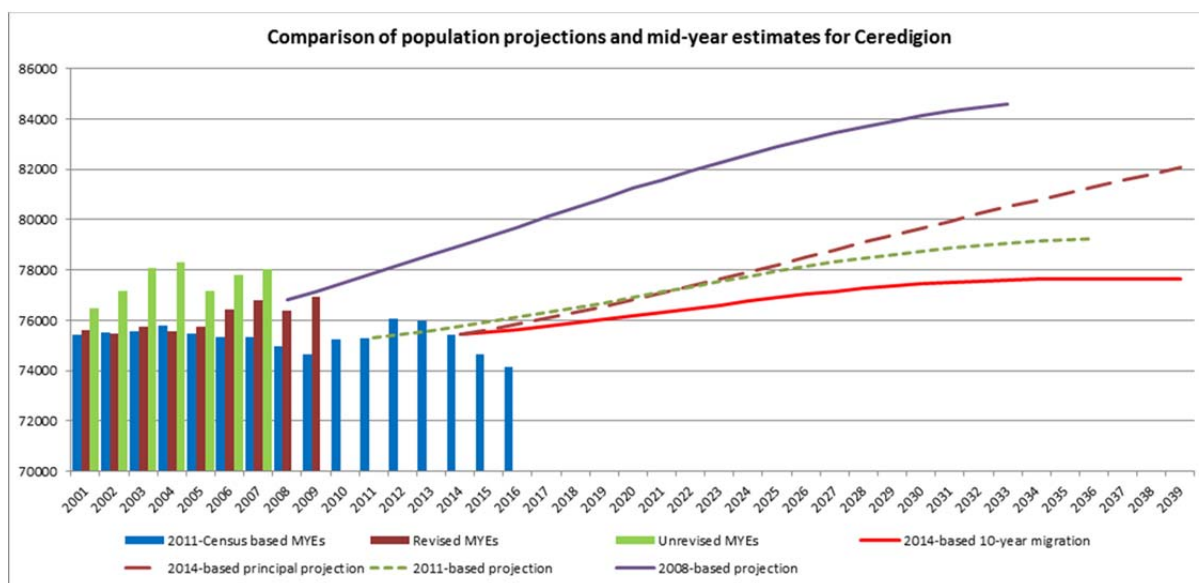
<b>AMR 3 (2015-16) triggered Review: Delivery inconsistent with Plan Strategy</b>
<ul style="list-style-type: none"> <li>• Lack of delivery of allocated sites</li> </ul>
<ul style="list-style-type: none"> <li>• Less than 5 year land supply</li> </ul>
<ul style="list-style-type: none"> <li>• Slow progress towards strategy</li> </ul>
<ul style="list-style-type: none"> <li>• Lower Population Growth Projections</li> </ul>
<b>Context / Identified Risk factors</b>
<ul style="list-style-type: none"> <li>• New legislation, advice &amp; guidance</li> </ul>
<ul style="list-style-type: none"> <li>• Impacts of Climate Change</li> </ul>
<ul style="list-style-type: none"> <li>• EU membership changes (Article 50 triggered),</li> </ul>
<ul style="list-style-type: none"> <li>• Reduced public sector funding</li> </ul>
<ul style="list-style-type: none"> <li>• Potential impact on student numbers (immigration control / student fees)</li> </ul>
<ul style="list-style-type: none"> <li>• Lower population &amp; household growth forecasts</li> </ul>
<ul style="list-style-type: none"> <li>• Ceredigion Well being Assessment / Plan</li> </ul>
<ul style="list-style-type: none"> <li>• Grow mid Wales Initiative</li> </ul>

## 7. LDP Strategy

### Population and Households

- 7.1 The adopted LDP was based on the 2008-based population projections for local authority areas by Welsh Government with some local refinements to take account of specific local population forecasting issues with the student cohort. The release of 2011-based population projections suggesting a significantly lower level of population projection was acknowledged in the AMRs, Given the caution urged in using these figures by Welsh Government, the November 2016 publication of 2014-based Population Projections and more recent publication of Wales Household forecasting (2017) will be used to inform review of additional housing needs. The early implications of the difference between the 2008, 2011 and the 2014 projections are set out below.

**Graph 1: Comparisons of Population Projections using different Methodologies**



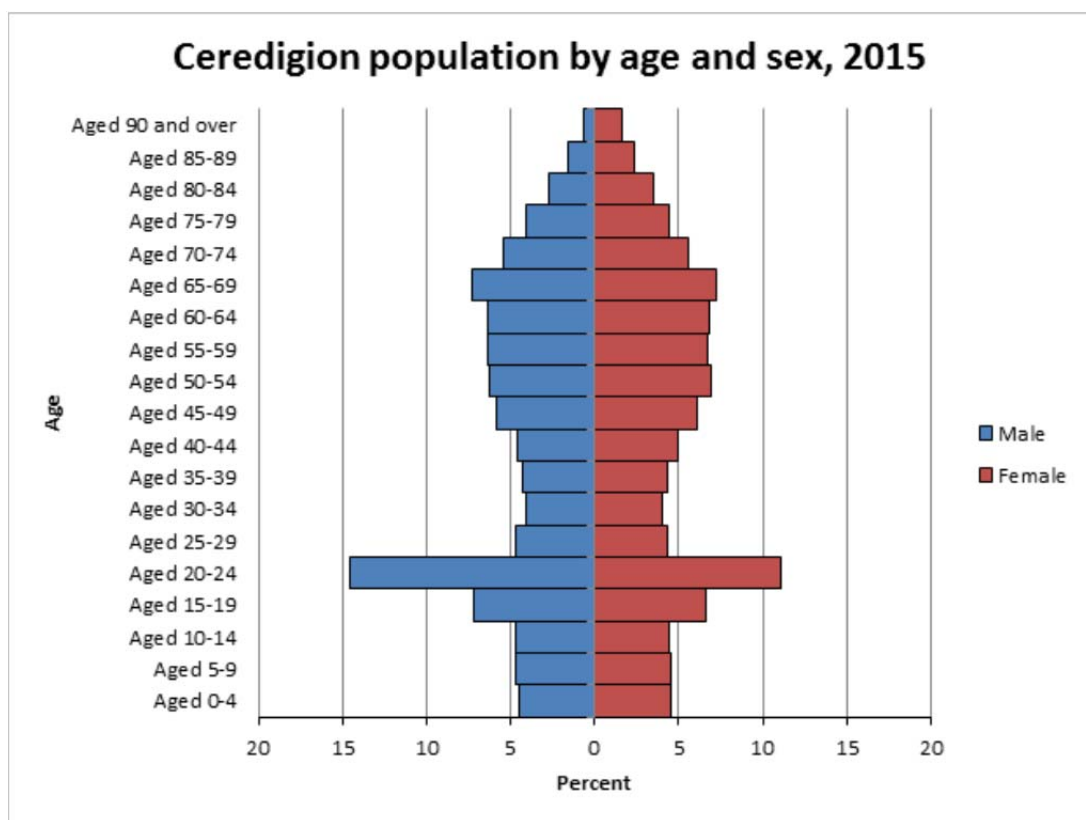
- 7.2 The population of Ceredigion in 2016 was 74,146 (2016 MYE). The latest Welsh Government population projections (2014-based) suggest that the population will increase steadily to 82,051 by 2039. The adopted Plan provided for a predicted increase in population from 76,400 (2009) to around 86,000 by 2022. Both the latest Mid-year estimates and the population projections suggest that Ceredigion’s population will not grow as much as previously estimated or projected.

### Local Authority Commentary:

- 7.3 Between 2014 and 2039 the principal population projection for Ceredigion is projected to increase by around 6,600 (or 8.8 per cent) to 82,100 with an alternative projection taking into account 10 year migration data suggesting population of slightly less than 78,000 in 2039, both projections considerably less than the LDP 2022 end point projection. This is the fourth largest projected increase in Wales. Increases are projected in most age groups apart from those aged 16-17 and 60(f)/65(m)-74. It is anticipated that net migration will account

for an increase of 7,300 in the population between 2014 and 2039 (with international migration accounting for two thirds); this is slightly offset by a reduction in population due to natural change of 600. Ceredigion is also one of only two local authorities where the median age is projected to fall (the other being Gwynedd). (<http://gov.wales/docs/statistics/2016/160929-local-authority-population-projections-2014-based-en.pdf> )

**Graph 2: Population by Age and Sex**



7.4 Population growth has been dependent on net inward migration for many years since the number of births per year is lower than the number of deaths in the county.

7.5 The Ceredigion Public Service Board Local Wellbeing Assessment (March 2017 and Consultation Draft Local Wellbeing Plan (September 2017) are available on the Public Service Board pages of the Council’s website <http://www.ceredigion.gov.uk/English/CeredigionForAll/hscw/Pages/Well-being-in-Ceredigion.aspx>.

7.6 The most notable feature in the population profile remains the large number of young people, skewed by those who come to Ceredigion to study at the universities in Aberystwyth and Lampeter, most of whom will leave at the end of their undergraduate studies.

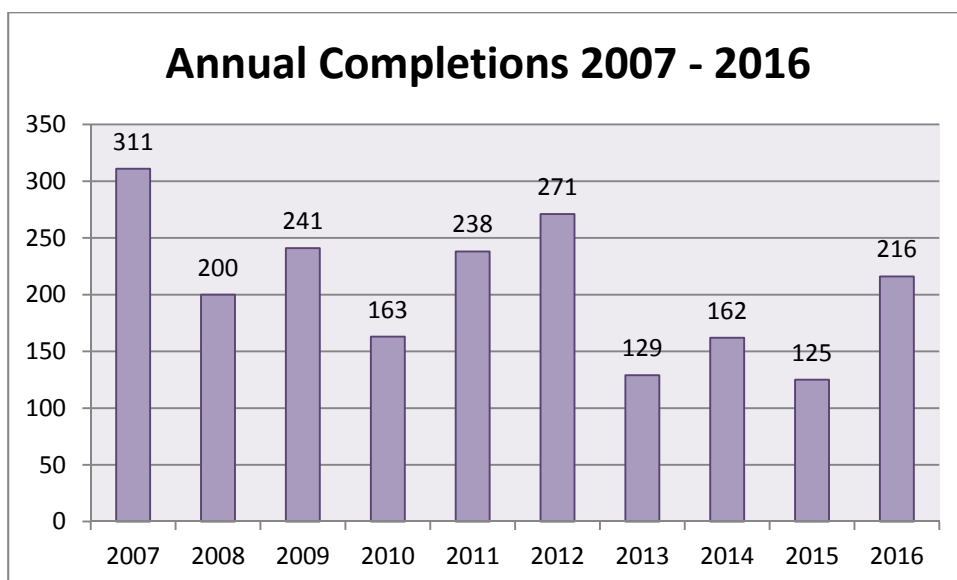
7.7 The Welsh Government published its 2014-based household projection in spring 2017, predicting that the number of households in Ceredigion will increase to 35,115 by 2039. This equates to a household growth of between 1700 – 3,000 households between 2017 and 2037 allowing for a 7% vacancy rate and looking at the 10 year migration and principal variants. In reviewing the dwelling requirement for the LDP, it is estimated that as at 30 April 2017 there were approximately 2,670 units remaining of an original dwelling requirement of 6,000. This calculation is based on 1,940 completions and 110 losses (Demolition & conversion leading to extra housing need) during the plan period so far, plus 1,500 outstanding consents.

- 7.8 Consideration will be needed as part of Plan revision to modifications to housing need arising from variations in population and household forecasting.
- 7.9 Risk factors identified in section 6 have the potential to impact significantly on current forecasting. In identifying an appropriate scale of growth it will be critical to monitor these factors closely and to identify the potential impact on both growth and composition of population and household projections.
- 7.10 Projections are ‘none policy adjusted’, providing a starting point for policy formulation, as such could be influenced by the County Council’s preferred growth strategy.
- 7.11 A detailed evidence paper will be required to establish the starting point level and composition of growth and the preferred level of growth (ie in line with projections, higher than standard or lower than standard and to identify the level of confidence in basing the Plan Strategy on the preferred growth option).

**Housing**

7.12 The population growth planned for the adopted LDP underpins determination of the number of dwellings to be delivered over the plan period. The LDP’s Strategy seeks to deliver 6000 dwellings in order to meet the predicted increase in population / households. This equates to a building rate of 400 dwellings per annum, an ambitious level of growth compared to the level of completions experienced within the County prior to the start of the plan period in 2007 (See Graph 2 below). However this needs to be read in the context of the Plan seeking to deliver housing to meet an anticipated growth to 2022, that is beyond the forecast to 2039.

**Graph 3 Annual Completions 2007-2016**



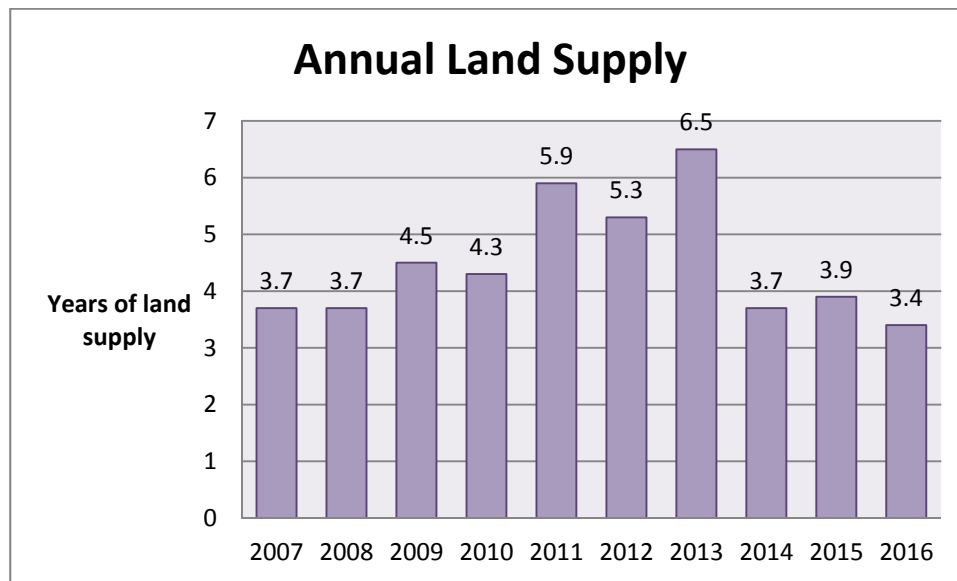
7.13 By 31<sup>st</sup> March 2016, 1,900 out of the anticipated 6000 dwellings required by the Strategy had been delivered, with a further 1600 units having been permitted. This equates to a total commitment of 3,500 dwellings 10 years into

the plan period. Whilst this represents a significant number of dwellings, completed and available for delivery, the level of delivery is below the Strategy requirement. Graph 4 above, which shows that the delivery requirement of 400 dwellings per annum has not been met in any single year of the plan period to date.

- 7.14 The highest level of completions was reached in 2007 with 311 dwellings delivered. This figure was just short of the target and reflected the ongoing development of a number of large sites in a period of economic boom.
- 7.15 There is little doubt that the economic downturn has had a significant effect on the demand for and delivery of dwellings over recent years, due to the contraction of the housing industry, reflecting the difficulty of small builders in accessing development finance and those of house buyers in accessing mortgage finance. The effects have been most pronounced since 2013 with dwelling completions falling as low as 125 in 2015. There are no national / volume house builders active within the County. The type of developers / builders prominent in this area are small local builders who seek to develop only those smaller sites that suit their business model.
- 7.16 LDP allocations are in some cases large, were intended to attract volume builders or allow local builders to 'upscale' and work together, and in so doing meet infrastructure requirements that could not be met by small sites operating independently of each other. However this ambition has not been realised. Whilst there is anecdotal evidence indicating that dwellings are selling well on some schemes, there are uncertainties over whether / when dwelling delivery could increase to the level experienced in 2008 and whether that level of delivery could be sustained for a period of time. It is considered that a period of strong and sustained growth for the UK economy and housing market is necessary for this to occur.
- 7.17 There are a number of factors, both positive and negative, which have the potential to influence the recovery of dwelling delivery within Ceredigion. In terms of positive factors, a number of financial schemes to support affordable housing delivery in particular are expected including: Social Housing Grant and Housing Finance Grant 2017 – 2020 approximately £11 million, Eco-funding grant (£20 million across Wales 2017-2019). So far the Help to Buy scheme has supported 12 households (3.8 per 10,000 households) to access new housing in Ceredigion from its launch in 2014, up to the end of March 2017. The scheme has been extended to 2021
- 7.18 In respect of negative factors, the lower than planned for population & household growth means that the Plan's identified housing need is considerably greater than the actual need, resulting in a lack of market demand for more housing, a need to reflect that market demand is for smaller, more affordable units and is probably linked to the lack of delivery on allocated housing sites apart from where an RSL have been involved. According to the House Price Index (HPI), average house prices in Ceredigion at the end of 2016 were lower than at the beginning of 2007. The average house price in Dec 2016 was £167,500, this is also about the average price for the 10 year period. Whereas

other parts of Wales and the UK are seeing a slight but steady increase in house values, Ceredigion's remain static, a further indicator of poor market demand. The suitability of the allocated sites in terms of both their size and infrastructure constraints is of concern. The profile of the local development industry suggests that there isn't capacity to delivery large housing sites or sites where major infrastructure improvements are required. In the meantime there is anecdotal evidence of a decline in the numbers of independent builders on whom market delivery has relied for small and medium sites. It will be important to identify effective means of building capacity in the local housebuilding industry and means of addressing infrastructure issues experienced by this sector: it will be for Plan Review to identify workable options to do this.

- 7.19 The aging population profile also needs to be factored into Plan review housing requirements, to ensure that the dwelling types encouraged reflect the needs of future occupiers. The Review will need to consider whether existing LDP policy LU02 'Requirements Regarding All Residential Developments', requiring all new dwellings to meet the Lifetimes homes standard, is adequate? The issues around a predominantly aging population will need to be considered in greater detail and strategies put in place to accommodate this sector.
- 7.20 Planning Policy Wales Edition 9 (November 2016) is clear in that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a readily available 5 year supply of the land for housing (paragraph 9.2.3). The Council has not achieved a 5 year land supply since 2013 (See Graph 2 below) and the most recent Joint Housing Land Availability Study (JHLAS) has calculated a 3.4 year housing land supply in 2016. Using the residual method, prescribed by Welsh Government in TAN 1, it is inevitable that with continuing under-delivery against the annual requirement this will result in a rapidly reducing housing supply as the cumulative under-delivery (the unmet need) is added to the need identified for the remainder of the Plan and divided by a reducing number of years as the end of the plan period moves progressively closer.
- 7.21 Technical Advice Note 1 Joint Housing Land Availability Studies (January 2015) states that where the local planning authority has a shortfall in housing land supply, consideration should be given to the reasons for the shortfall. As indicated above, the economic downturn has had a significant effect on the delivery of housing allocations and this is considered to be principal reason for not achieving a 5 year land supply since 2013. Notwithstanding this, there remains a need to review all undeveloped housing allocations in the LDP to ensure that development on these sites remains viable and the allocations will be delivered. This could result in certain housing allocations being removed from the LDP and new sites being allocated to meet local housing needs for the next plan period. A formal 'call for candidate sites' inviting anyone to put forward potential sites for development will form part of this process, recognising that it will be important to engage landowners, agents, developers and communities in this process.

**Graph 4 Annual Land Supply 2007 - 2016**

- 7.22 It is important to note that where the housing land supply figure is below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications for housing provided that the development would otherwise comply with the development plan and national policies<sup>12</sup>. Given the Council's 3.4 year housing land supply<sup>13</sup>, considerable weight would have to be given to any speculative housing development that meets the aforementioned criteria. This situation therefore has the potential to undermine the plan-led approach which provides certainty for developers and the public about the type of development that will be permitted at a particular location.
- 7.23 Engagement with the development industry through the JHLAS and LHMA preparation process identified a combination of reasons for the lack of delivery on large or allocated sites. The reasons included; unrealistic land values being sought by landowners, viability due to affordable housing requirements, increased build costs and infrastructure costs, lack of opportunities for attractive development finance, loss of skilled labour from the local development industry due to its demographic profile.
- 7.24 However, the lack of delivery is also a feature of many rural and urban areas due to the general slowdown in the market following the onset of the global recession in 2008, the effects of which are still keenly being felt in rural areas where house prices have stagnated and in some cases continued to fall in the face of inadequate finance – for developers and for buyers. The mismatch in available (2009) population and household data and the 2014 projections may be a combination of contributory factor and outcome. The LDP planned for the delivery of 6,000 homes to meet the creation of 5,600 households by 2022. The

<sup>12</sup> Paragraph 6.2 of Technical Advice Note 1 – Joint Housing and Land Availability Studies (January 2015)

<sup>13</sup> 2016



latest household projections suggest a level of household growth over the remainder of the Plan period continuing at lower than the identified annual rate.

### **Settlement Strategy**

- 7.25 Underpinning the Strategy was work undertaken to establish a Settlement Strategy for the LDP. This resulted in the identification of Service Centres and associated Settlement Groups.
- 7.26 Each Settlement Group has a Service Centre (either Urban or Rural). Each Group also encompasses other, smaller settlements (smaller relative to the size/role of its Service Centre), groups of dwellings and farms, whose communities are most likely to use the services and facilities of that particular Service Centre
- 7.27 Settlement Groups are approximations to complex patterns of local geography for which many alternative arrangements could be suggested. However they have been identified in a way that those living within them may recognise the area as representing their own wider local community.
- 7.28 The settlement strategy provides for the Service Centre for each Settlement Group to take the majority of growth for that Group in line with sustainability principles, linked settlements to take a smaller provision, but with a balancing mechanism built in, to avoid growth within linked settlements and outside settlements to the detriment of the Service Centres which are expected to deliver the majority of housing growth in Ceredigion.
- 7.29 At the point of plan adoption, only 1 settlement group (Lampeter) was in balance, by April 2016 this had risen to 4 settlement groups being in balance (Cardigan, Adpar, Tregaron and Penrhynoch). Some settlement groups are moving towards the required balance (Aberaeron and Aberystwyth) and other settlement groups have seen little or no recent growth (Llanybydder and Devils Bridge). However, the majority of settlement groups have continued to move further away from their targets (making the strategy very difficult to achieve in the current plan period), with members noting that young people want to live in their home villages.
- 7.30 The 3<sup>rd</sup> Annual Monitoring Report showed that the total commitments (completions and outstanding consents) had risen in both Urban and Rural Service Centres RSCs and had fallen slightly in Linked Settlements and Other Locations, with totals completed falling in increasing slightly in RSCs and with no change in rate in Linked Settlements and Other Locations since the previous monitoring period, see table 3:

**Table Number 3: Comparison between Settlement trajectory targets, actuals and completions AMR2 – AMR3**

	Plan Period trajectory (commitments) (%)	Actuals (commitments) (%)	Divergence from strategy	Completions change (Totals)
Urban Service Centres	47	44	-2%	-1% (43%)
Rural Service Centres	21	18	-3%	+2% (15%)
Linked Settlements and Other Locations	32	39	+7%	0% (43%)

- 7.31 As the number of outstanding consents in other locations (outside settlements) has continued to rise, an investigation has confirmed that the vast majority of extant sites are confirmed as extant; where action to impose completion would be difficult to justify. A commitment to issuing shorter permissions to help address this situation has been introduced to increase the likely delivery rate. A common argument put forward to justify consent for further dwellings in linked settlements and other locations for settlement groups which are out of balance is due to the lack of delivery on allocated sites within the service centres. A review of allocations including an assessment of future deliverability is therefore required.
- 7.32 The main concern is surrounding the implementation of Policy S04. Since adoption, 18 applications have been approved against officer recommendation in 'other locations' (ie outside settlements) alone. In the wider context, this is only a small proportion 20% of all dwelling applications approved in other locations. Further applications have been approved against officer recommendation in linked settlements including where:
- There is no evidence of unmet need for affordable housing in the locality
  - The proposed location does not comply with the national definition of exception sites and may be a location only acceptable for TAN 6 dwellings
  - Conversions and renovations
  - The capacity of the linked settlement has already been exceeded
  - One or more of the TAN 6 tests has(ve) been failed.
- 7.33 Changes to policy to allow more housing in such locations would be against national policy and are unlikely to be found sound at examination.
- 7.34 Ceredigion has a strong trend of approvals for TAN 6 dwellings, 33 in total since adoption (to March 2016), an average of 11 per annum. This is in contrast to comparable rural authorities where the numbers of approvals for TAN 6 are much lower. The review will need to consider the justification of the approach.
- 7.35 Notwithstanding the failure of the Plan to deliver the Strategy at pace, the Settlement Strategy is complex, extremely technical, and difficult for all involved

to understand, resource intensive to monitor and further complicated by the dynamic aspect which undermines certainty in policy over time. Revision of the strategy and identification of allocations with confidence in deliverability (either by policy or by delivery interventions) will be challenging but necessary to secure confidence in the replacement Plan.

### **Affordable Housing**

- 7.36 There continues to be demand for affordable housing to meet local needs in rural areas. The affordable housing target of 70 dwellings per annum was exceeded in 2016 which shows that a target of 70 dpa is achievable even with lower overall build rates, however, it was helped by a number of large RSL developments which were completed during the monitoring year. The average affordable housing delivery rate per annum since adoption now equates to 42 affordable dwellings per annum.
- 7.37 In terms of single unit affordable dwellings, the County has almost 500 outstanding consents for affordable units with little prospect of being delivered as the immediate unmet need they were intended to meet has not materialised.
- 7.38 20% affordable housing continues to be negotiated on larger sites and the authority has yet to receive a successful viability challenge on an allocated site. Viability challenges however have been successful on a number of small sites for conversions and changes of use. There have also been successful viability challenges against the 10% commuted sum on a single open market new build dwellings. This has triggered the commissioning of a more up to date strategic viability study, the results of which will be available in time to inform review in 2017.
- 7.39 Potential amendments to policy S05 – Affordable Housing will be subject to the outcomes of the Strategic Viability Assessment (SVA). We are currently gathering evidence which includes the LHMA and SVA to determine whether the current policy is still achievable and workable in the current market. The evidence base will indicate whether changes to targets, thresholds for contributions, market areas and the mix of tenures are required. Early results indicate that the county should have a split target over different areas, with locations around Aberystwyth and Aberaeron having a higher target reflecting their higher values and access to employment opportunities and areas around the Teifi valley and inland upland areas achieving lower sales values with consequential impacts on viability. These viability concerns come at a time when the WG has identified a new and increased national affordable housing delivery target for Wales of 20,000 by 2021. The review must consider the extent to which Ceredigion can contribute to meeting this target through the delivery of affordable homes via the planning system.
- 7.40 The policy at present is prescriptive as to the amount and tenure of affordable housing to be delivered; a review of this policy will be required as the results of the LHMA (2016) suggest a different tenure split. Following the publication of the 2014-based household projections, the authority will need to update the housing needs model used to inform the LHMA and take into account housing needs evidence from the recently implemented common housing register.

- 7.41 The 2016 GTAA recently approved by WG identified no need for gypsy and traveller sites / pitches, therefore no allocation is required. The current criteria based policy approach is therefore considered sufficient.
- 7.42 **In conclusion**, regarding the delivery of market and affordable housing in the county, the rate of dwelling delivery is not at a level sufficient to meet the requirements of the LDP's Strategy and, as a consequence, the Council does not have a 5 year land supply. There remain uncertainties associated with the population and household growth assumptions on which the Plan is based, whether / when dwelling delivery rates will reach the level required to meet the needs of the Strategy and whether that rate can be sustained for a period of time, particularly in light of uncertainties surrounding the UK leaving the European union. There are also variations in success of dwelling delivery between settlement types, in the USC and RSC delivery is slow partially because allocations are often large but permissions that are approved are much more likely to come forward. Whereas the authority has a high proportion of outstanding consents many of which are small sites or individual units in linked settlements and other locations that are extant often for some years with little prospect of ever being delivered. Since adoption the outstanding consent figure has decreased, unfortunately it is sufficiently high to push many settlements out of balance. Small incremental improvements are happening both in terms of meeting the strategy and in reducing outstanding consents but the pace of change is insufficient to meet identified targets.
- 7.43 Increasing employment opportunities within the County is another key component of the LDP Strategy and, accordingly, the Plan will need to identify additional provision, subject to a separate topic paper, comprising both new and existing of employment land
- 7.44 Consideration will need to be given to the employment land requirement up to end of the next plan period, based on
- revised population projections,
  - a review of the employment rate of the working age population,
  - the revised economic development requirements of Planning Policy Wales chapter 7<sup>14</sup>, Technical Advice Note 23 Economic Development<sup>15</sup> and 'Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan'<sup>16</sup>,
  - consideration of likely types of employment growth and the associated potential land take for any such new developments.
  - recognition that a significant component of local employment growth does not require specific employment land but, rather, can be delivered on existing land through a variety of criteria based policies. Therefore the need for employment specific land allocations in Ceredigion may not be as great as in other local authorities and might frustrate potential development for other land uses.

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<sup>14</sup> Edition 9 (November 2016)

<sup>15</sup> (February 2014)

<sup>16</sup> WG (August 2015)

7.45 An employment land review has been undertaken, using an initial sifting exercise to draw up a list of all windfall and potential sites drawing on a variety of sources<sup>17</sup>, and more detailed analysis to inform consideration of potential sites by an officer working group<sup>18</sup>, prior to consideration by the Sustainable Futures Executive Group of the Public Services Body, resulting in the identification of 286.35 ha of land with potential for employment use, available for development / redevelopment across 62 sites countywide. It will be for the Plan Review to consider the sustainability and deliverability of these sites.

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<sup>17</sup> Analysis of planning database applications, search terms relevant to B uses and office space and of the annual retail and employment survey for non-allocated sites entries

<sup>18</sup> including Minerals and Waste and environmental protection inputs.

## LDP Policies: Contextual Changes

### Housing & Welsh Language

7.46 The majority of Housing and Affordable Housing policies have been discussed in the preceding sections. However, policy implementation issues have identified the need to review the form and wording of Policy LU09 and to revise policy DM01, in terms of the changing context for language impact assessment which will draw on the revised TAN 20 following publication<sup>19</sup>.

### Economy: Employment Land, Retail & Tourism

7.47 The monitoring indicators for the economy do not identify any specific requirement for change, however, contextually; the evidence base is recognised as requiring update. In terms of economic evidence base, an in house Employment Land Review has been undertaken and a need identified for an externally commissioned economic needs assessment to inform a review in 2017, incorporating the consequential changes to context arising from the Growing Mid Wales Strategy and the Council's commitment to the growing Mid Wales Partnership.

7.48 There remains one current retail allocation which is due to complete in March 2017. The authority collaborated on a joint regional Retail Capacity Study<sup>20</sup>, prepared using the 2014 based population projections, which concluded that there was no requirement for additional retail allocation in the short to medium term and identified a limited long term need for comparison and bulky goods, confined largely to the town centres of Aberystwyth and Cardigan which may be able to be met through the reuse of existing stock. The reliability of these findings is also a concern as retail forecasting beyond 5 years has inherent methodological weaknesses. The RCS has also recommended a regional retail hierarchy which outlines the strategic importance of Aberystwyth and the regional local significance of Lampeter and Cardigan, but places less importance on the centres of Aberaeron, Llandysul and Tregaron for retail needs. During 2015-16 a primary frontages review was commenced, which identified revisions required to monitoring, implemented in 2016/17 with the majority of targets now being achieved.

7.49 In terms of Tourism, discussions with Development Management and Tourism Officers have identified some policy implementation and usage issues around inland locational requirements (Policy LU14), 'wet and wild' type facilities (Policy LU17) and alternative accommodation (i.e. Glamping). Further consideration will need to be given in the Review to how Plan revision will provide for new tourism opportunities. Appeal decisions relating to caravan parks and holiday let conditions have also been identified as relevant to policy review. Further, the authority is currently undertaking a bedstock survey<sup>21</sup>, which once available will be considered in conjunction with identified issues to inform any required policy changes.

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<sup>19</sup> publication anticipated Summer 2017

<sup>20</sup> with Pembrokeshire County Council and Pembrokeshire Coast National Park Authority, January 2017

<sup>21</sup> the results of which will be available later in 2017

### **Minerals and Waste**

- 7.50 Revisions to Planning Policy Wales and Technical Advice Note (TAN) 21<sup>22</sup> in respect of waste planning identify the need for LDPs to have particular regard to the Collections, Infrastructure and Market Sector Plan (CIMS Plan), waste planning monitoring reports, waste management priorities relevant to the local area (paragraph 12.6.1), to identify suitable locations for accommodating sustainable waste management facilities (paragraph 12.6.2) and to secure opportunities to reduce or recycle waste as part of the design, construction and operation of buildings (paragraph 12.6.3). (PPW), to comply with regional annual monitoring arrangements and have regard to regional 'areas of search maps' which remain relevant to the identification of locations suitable for waste management facilities. (TAN21).
- 7.51 Requirements for disposal/recycling of waste are set nationally and the Council is currently meeting all landfill and waste recycling targets.
- 7.52 In relation to Minerals, the Regional Technical Statement 2014 includes a requirement for regional apportionment to be agreed across south west Wales excluding the Pembrokeshire Coast National Park, which will need to be reflected in the new plan. The authority still has sufficient hard rock and sand and gravel landbanks to meet both Ceredigion County Council's previous requirements and contribute more than its equal share of the regional apportionment figure. However all mineral planning permissions are temporary, albeit often extending for many years, and with the LDP Review rolling forward the end date of the LDP, so it will be necessary to review Policy LU27: Sustainable Supply of Mineral Resources, to in respect of all existing active mineral sites where a planning condition attached to the existing permission requires mineral extraction operation to cease, in the case of sand and gravel sites, before 7 years beyond the end date of the LDP Review; and in the case of crushed rock aggregate sites before 10 years beyond the end date of the LDP Review.

### **Renewable and Low Carbon Energy**

- 7.53 New expectations have been introduced<sup>23</sup> for more use of spatial policies in LDPs to reflect renewable energy aspirations, as there are concerns that elements of energy policy in PPW are not being fully implemented by local planning authorities.
- 7.54 Renewable Energy Assessments (REAs) are required to form part of the (LDP) evidence base<sup>24</sup> and to inform policies, areas of search and allocations which guide local-authority scale (5MW – 25MW) renewable energy schemes or other low carbon technologies to the most appropriate locations. The planning system is required to identify and protect areas with renewable energy generation potential for the long term.

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<sup>22</sup> February 2014

<sup>23</sup> WG letter to local planning authorities (10<sup>th</sup> December 2015) outlining the Minister for Natural Resources' expectations for energy policies in local development plans

<sup>24</sup> A revised version of the Renewable Energy Toolkit was published by the Welsh Government in 2015

7.55 The authority is preparing a Renewable Energy Assessment in house in accordance with the WG Toolkit. The REA will require updating with future AMR results to inform revised renewable energy targets for the replacement plan. The authority has commissioned District Heat Network Mapping to inform the REA. This element of the REA is expected to be completed by the end of 2017. The authority must also consider the implications of the REA for the County's landscape, in particular its special landscape areas. The authority plans to publish the REA alongside the deposit plan. It is clear that significant contextual changes have occurred in respect of renewable and low carbon energy since the adoption of the LDP. This will be a key issue for a revised LDP and policy changes are anticipated to policies LU25 and LU26.

### **Environment and Ecology**

- 7.56 New legislation, policy and guidance are introducing significant contextual change to LDP policies on the Built Environment.<sup>25</sup> Once the provisions of the Historic Environment (Wales) Act 2016 are fully introduced, the potential for amendments to LDP historic environment section and policies will be considered.
- 7.57 Similarly new legislation, policy, guidance and international / national evidence<sup>26</sup> will inform any changes considered necessary to the LDP and to Sustainability Appraisal and Strategic Environment Assessment.
- 7.58 Together, the Aichi 2020 targets, the Wellbeing of Future Generations Act and the Environment Act provide a requirement to consider resilient ecosystems. It is likely that further evidence will be required in order to demonstrate this is being delivered as well as potential changes to LDP policy/SPG. This evidence could expand on the existing evidence prepared to inform the identification of Sites of Importance for Nature Conservation (SINCs).
- 7.59 Evidence has been prepared to identify sites that meet SINC criteria in Ceredigion. These sites will need to be considered in the allocated site review and candidate sites assessments. The LDP already contains a policy for SINCS, however minor changes to policy DM15 may be required.
- 7.60 Issues with delivery of ecological policies in terms of significant impacts and enhancements are identified in 3<sup>rd</sup> AMR. These relate to implementation rather than inherent issues with policies or targets.

### **Proposals Map**

- 7.61 The LDP Proposals Map contains a number of designations which are determined by mechanisms that sit outside the LDP process. Examples include areas of flood risk and sites of special scientific interest. Such designations no longer have to be included on the LDP Proposals Map and, as an alternative, can be identified on a separate non Statutory Constraints Map<sup>27</sup>. Whilst not

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<sup>25</sup> The Historic Environment (Wales) Act 2016; update to PPW Chapter 6 (2016) revised TAN 24 'The Historic Environment' (May 2017) and a number of provisions of the Act commenced (May 2017)

<sup>26</sup> the Environment (Wales) Act 2016, the State of Natural Resources Report (2016), National Natural Resources Policy 2015, emerging Area Statements and the Nature Recovery Plan (2015)

<sup>27</sup> Section 2.4, Local Development Plan Manual (Edition 2, August 2015)



part of the LDP, the LDP should reference it and list the designations it includes.

- 7.62 The use of a separate Constraints Map would greatly improve the legibility of the LDP Proposals Map and would allow amendments to be made readily to take account of changes that are not determined by the LDP.

### **Sustainability Appraisal**

- 7.63 At present the Review Report identifies areas of change only and therefore Sustainability Appraisal (SA) implications are yet to be identified. The review itself will consider how the plan will be changed. Detailed revisions to the plan will be subject to SA requirements. A review of the Sustainability Appraisal framework will be completed as part of Stage A Scoping in accordance with the Regulations. Consulting on the scope of the SA (Stage A) will be undertaken as part of regulation 14, (pre- deposit participation). Stage B and C in the SA/SEA process will be undertaken in advance of regulation 17 (Deposit of Proposals) and stage D accompanies the regulation 17 statutory deposit of proposals (Stage D). This process will replicate that undertaken in the Ceredigion LDP.

## 8. Joint Working

- 8.1 Local Government reorganisation has been a talking point for some considerable time, the Williams Report (January 2014) on Public Services in Wales recommended that, Ceredigion could merge with one or both of Carmarthenshire and Pembrokeshire Councils. However since the Welsh Government elections Mark Drayford AM suggests Local Authorities should seek to work more collaboratively and forced local council mergers will not be sought in the short to medium term. Collaborative working among the counties in Mid and West Wales is ongoing and further opportunities for collaboration are actively sought.
- 8.2 The WG recently consulted on a white paper relating to local government reform. The white paper specifically mentions strategic land use planning as an opportunity for service regionalisation along with economic development and transport. In this context there are two different regional footprints identified which affect Ceredigion;
- Growing Mid Wales Sub Region (Powys & Ceredigion)
  - Central and South West Regional Board Joint Governance Committee Area (Powys, Ceredigion, Pembrokeshire, Carmarthenshire, Swansea & Neath Port Talbot)
- 8.3 Ceredigion County Council has committed to working in partnership with Powys County Council on the growing Mid Wales Initiative and to encourage improved consideration by Welsh Government of the rural agenda.
- 8.4 The Planning and Compulsory Purchase Act 2004 makes provision for two or more local planning authorities to prepare a joint local development if they so wish. In addition to this, The Planning (Wales) Act 2015 now gives Welsh Ministers the power to direct local authorities to produce joint local development plans.
- 8.5 Given these contextual and legislative changes, consideration needs to be given to the issue of joint working and plan preparation with the aforementioned local authorities. While it could be argued that joint working with Pembrokeshire and Carmarthenshire County Councils should be explored based on the previous shared administrative boundary under the former 'Dyfed' it is not considered that this would be appropriate given that both authorities are committed to working within the economic framework of the Swansea City Region / City Deal whereas Ceredigion is committed to joint working within the Growing Mid Wales Partnership. It may therefore prove more useful to consider how we could collaborate with Powys alongside the Growing Mid Wales Partnership, however as the Council is commencing Review at the same time that Powys County Council is progressing through independent examination – the two authorities are at quite different stages of the plan process so it seems unlikely a joint plan would be viable in the short term.
- 8.6 Until political decisions have been made in this wider context, opportunities for collaborative working will continue to be sought with all neighbouring authorities

and consistency with adjoining authorities plans will be considered as part of the replacement plan.

## 9. Conclusions

- 9.1 The findings of preceding AMRs together with the review of the evidence base and contextual changes indicate that a full revision procedure should be followed, to include Plan Strategy and a replacement LDP prepared.
- 9.2 The housing element of the strategy which underpins the LDP is not currently being delivered at a pace identified in the adopted Plan.
- 9.3 Whilst many other aspects of the LDP are considered to be functioning effectively, contextual changes and changes to the evidence base have also resulted in the need to revise certain policies and allocations within the Plan and to reconsider the Plan's Vision, Key Issues and Objectives. This is particularly in light of the legislation that has been enacted since adoption of the plan in 2013, namely the Housing (Wales) Act 2015, the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015, the Historic Environment (Wales) Act 2016 and the Environment (Wales) Act 2016.
- 9.4 Primarily it is the strategic policies that need reconsidering, together with allocations, whilst a variety of other policies in the plan will need minor amendments only: in general terms the Development Management policies and Land Use policies are proving effective in managing development in the county. The Deposit Plan will indicate clearly those policies subject to no change or minor change.
- 9.5 Achieving a sustainable balance of consents across the settlement hierarchy has proven very difficult to achieve. This issue is compounded by the general slowdown in housebuilding rates since the economic recession which rural areas like Ceredigion are taking longer to recover from.
- 9.6 It is proposed that revision of the Plan will cover a 15 year period from a proposed start date of April 1 2018, with detailed arrangements set out in the Delivery Agreement.
- 9.7 Turning to the three tests of soundness which the LPA is required to consider:
- **Does the plan fit?** In answering this question whilst taking into account the plan needs to be amended in light of the new legislative framework adopted since the plan was developed. The plan was built on the principles of sustainability, resilience and well-being, therefore whilst tweaks will be required to better reflect newer agenda items such as the specific Well-Being goals the plan as it exists is consistent with other plans, but could be moulded to better reflect changes.
  - **Is the plan appropriate?** The plan has been designed to meet the needs of the residents of Ceredigion alongside the requirements of the planning policy frameworks in which it operates. The wants of the local population do not always neatly fit into the requirements of PPW. Therefore the LDP is a compromise which is appropriate for the location for which it has been developed, based on the best available evidence we have. However as new sources of evidence come to light changes are required to the plan to

make it more appropriate, in areas such as affordable housing delivery etc.

- **Will the plan deliver?** For the Ceredigion LDP this is the crux of the issue and the challenge to achieve in Plan review. Whilst the majority of the policies in the LDP are effective and deliver their intended consequences, some of the most fundamental issues are difficult to achieve for a number of reasons. As a rural authority there is a greater pressure for development in rural areas which does not fit in neatly into the national planning agenda. The strategy has helped to slow the rate of unsustainable permissions but it has not stopped them. These issues are compounded by the general slowdown in the house building industry UK wide but particularly so in this area where we have no mid-size builders and no volume builders operating. Thus development in Ceredigion is reliant on the small builder / one man band, who have struggled in recent years to access finance. So what can the Council do to make the plan deliver? Much of delivery mechanisms are outside the control of the Local Planning Authority as they are governed by market forces. The Council could consider reducing requirements – however this too would not comply with the Welsh Government focus on delivering affordable housing).

## Appendix 1: Evidence Base Update Table

LDP Evidence Base	Current Status
Representations to the plan	In response to discrete & statutory consultations
Strategic Viability Assessment (SVA)	Completed 2017
Retail Capacity Study (RCS)	Completed 2017
Economic Needs Assessment & Employment Land review	In progress
Habitats Regulation Assessment (HRA)	Will be updated when first drafting of preferred strategy is produced and as part of the allocated site assessment
Gypsy Traveller Needs Assessment study	Completed 2016
Local Housing Market Assessment (LHMA)	Completed 2016, further update required.
Open Space Assessment	Required for deposit – will involve reconsideration of existing assessment for open space changes.
Consultation Report	Required for deposit
Sustainability Appraisal and Strategic Environmental Assessment (SASEA)	Stage A – January 2017 – February 2018 Stage B – February 2018 – May 2019 Stage C & D – May 2019
Household Projections	In progress
Candidate Sites Assessment	Anticipated early 2018
Housing Consents Research	In progress
Allocated Sites and Service Centre Review	Preliminary work completed 2017
Ceredigion Tourism Bedstock Survey	In progress
Strategic Flood Consequences Assessment (SFCA) update	Consideration of an update will only be required if radical changes to the amount and type of development in Aberystwyth or Cardigan are proposed, which is considered unlikely at this stage. Liaison with Welsh Government on this issue is ongoing.
Renewable Energy Assessment (REA)	In progress
Green / Blue Infrastructure Plan	To be prepared to inform pre-deposit stage

## Appendix 2

### Summary of representations received in response to consultation on the Draft Delivery Agreement & LDP Review Report: Agreed Council Position and Change to Delivery Agreement / Review Report

The Annual Monitoring Reports are not part of the recent consultation. All comments on the AMRs are noted but no change to the published is proposed

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
1.	Respondent 1 <i>Cydlynnydd Teuluoedd yn Gyntaf a Ffoaduriaid</i> Families First and Refugees Coordinator CCC	<i>Bydd yn rhaid i'r adolygiad o'r Cynllun Datblygu Lleol ystyried y ddarpariaeth o fannau agored yn gyffredinol.</i>  The LDP review will need to consider open space provision in general.	The Review Report identifies matters of strategic importance that need to be addressed in preparation of the Replacement Plan. It recommends a full review. The 2017 Annual Monitoring Report notes that 'The LDP review will need to consider open space provision in general': Provision of open space through planning will be a consideration in progressing the replacement plan.	Review Report	DA – No change; RR - To include this report as an annex to the RR, referencing open space through planning as a consideration in progressing the replacement plan.
2.	Respondent 2 Member of Play owners network	Need for easy read/children's version of the two consultation documents.	Arrangements were made to present to meetings of the Ceredigion Voices for Equalities and the Disability Forum during the consultation, but both groups cancelled the arranged meetings/presentations.  The Language and Equalities Policy Officer has advised that, for future consultations, a document tagline should be included: <b>'if you require this document in an</b>	Delivery Agreement & Review Report	DA To include tagline on the cover and to reference inclusion of the 'tagline' within the DA, for future LDP consultations;  RR – To include tagline on the cover

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
			<b>alternative format, such as large print or a coloured background, please contact [insert: name and contact details]'</b>		
3.	Respondent 3 Cered	Are you offering a presentation / response session on the consultation? Maybe it would be an idea to hold a County Forum meeting to respond to the review of the Local Development Plan?	Position as (2) above	Delivery Agreement & Review Report	DA To reference inclusion of the 'tagline' in the DA, for future LDP consultations; Clarification within the DA that Future LDP consultations will be accompanied by the offer of presentations / attendance at appropriate meetings such as the Ceredigion Voices for Equalities and the Disability Forum  RR – No change
4.	Respondent 4	The preference for joint working with Powys County Council (Mid Wales Partnership), rather than with Carmarthenshire & Pembrokeshire (former Dyfed partners). See 1) 3.27 [AMR], 2) 4.1 [RR] & 3) 8.5 [DA].  • Allied to this is 3.21 [AMR] which states that	DA: The DA considers the potential for formally progressing a joint LDP with 1 or more other authorities. It notes the preference, in the long term for this to be with Powys County Council, because of the strategic alliance of the two authorities within the Growing Mid Wales Partnership, but recognises that with Powys working	Delivery Agreement & Review Report  DA [AMR]	DA To clarify wording in the Plan to reflect the difference between formalised collaboration in a Joint Plan and that an intrinsic part of replacement plan preparation would involve working with neighbouring authorities on evidence base



	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		<p>Aberystwyth is the primary shopping destination for the county whereas for the south of Ceredigion it is Carmarthen &amp; Haverfordwest,</p>	<p>towards a spring LDP adoption, the timing is not right for the CCC 1<sup>st</sup> replacement Plan timing. The DA recognises that Carmarthenshire and Pembrokeshire County Councils intend to prepare first replacement plans to broadly similar timelines as that proposed for Ceredigion Council. It recognises benefits from joint working on evidence where this offers advantages in terms of efficiencies / effectiveness, including detailed consideration of cross border matters. The County Council considers that formalising arrangements into a formal Joint Plan with Carmarthenshire and Pembrokeshire would:</p> <ul style="list-style-type: none"> <li>not be the appropriate, given that Carmarthenshire and Pembrokeshire Councils are part of different regional collaboration focussed on the Swansea City Deal,</li> <li>increase the complexity of the Plan,</li> <li>be likely to introduce increased costs,</li> <li>complicate governance</li> </ul>		<p>and cross boundary matters.</p> <p>RR - To include this report as an annex to the RR, referencing:</p> <ul style="list-style-type: none"> <li>joint working on cross border matters;</li> <li>non statutory, more localised Place Plans, as considerations in progressing and delivering the replacement plan;</li> <li>Joint working: Noted, No change proposed;</li> <li>Savings will be achieved by joint working on evidence base alongside co-operation with all neighbouring authorities on cross boundary matters;</li> </ul>
<ul style="list-style-type: none"> <li>3.33 &amp; 3.34 [AMR] regarding education, which makes no mention of cross border (into Carmarthenshire and Pembrokeshire) joint working with and the recent merger of Coleg Ceredigion with Coleg Sir Gâr.</li> </ul>	DA [AMR]				
<ul style="list-style-type: none"> <li>healthcare, the provision of which is based upon the former Dyfed, via the Hywel Dda Local Health Board;</li> </ul>	DA [AMR]				
<ul style="list-style-type: none"> <li>Ceredigion &amp; Powys are physically separated by the Cambrian Mountains</li> </ul>	DA				
<ul style="list-style-type: none"> <li>The centres of population in Ceredigion are physically remote from Powys [DA]</li> </ul>	DA				
<ul style="list-style-type: none"> <li>Culturally &amp; linguistically Ceredigion is closer to</li> </ul>	Delivery Agreement &				

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		<p>Carmarthenshire and North Pembrokeshire than it is to Powys [DA]</p> <ul style="list-style-type: none"> <li>• Communities that straddle Ceredigion, Carmarthenshire &amp; Pembrokeshire boundaries would benefit from having a common planning vision, structure and approach [DA/RR]</li> <li>• Co-operation across the former Dyfed would bring significant cost savings, though rationalisation, joint working and shared resources</li> </ul>	<p>arrangements ,</p> <ul style="list-style-type: none"> <li>• potentially, delay adoption,</li> <li>• increase risks in plan preparation and adoption;</li> </ul> <p>The Council considers that Communities that straddle Plan boundaries might benefit from detailed work to secure Place Plans.</p> <p>The DA notes the commitment by Ceredigion to work with neighbouring authorities in preparing evidence, as appropriate. The preference to joint working references paragraphs within the DA.</p>	<p>Review Report</p> <p>Delivery Agreement &amp; Review Report</p> <p>Delivery Agreement</p>	
5.	Respondent 5 HBF (Home Builders Federation)	<p>Para 7.17 The HBF advise that the current Help to Buy programme is not due to end until 2021, this date should be stated</p> <p>Para 7.18 Should be separate paragraphs for each issue however most of this issues do not control demand or</p>	<p>Noted</p> <p>Noted</p>	<p>Review Report</p> <p>Review Report</p>	<p>Noted To include this report as an annex to the RR, reference to the end date for 'Help to Buy', as a consideration in progressing and delivering the replacement plan</p> <p>Noted, No change proposed</p>

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		need for homes			
		Para 7.19 If LDP policy LU02 'Requirements Regarding All Residential Developments', already requires all new dwellings to meet the Lifetimes homes standard, what higher requirement is available for the policy to require? HBF are concerned that increased building standards could result in higher build costs and make development less viable & would deter smaller builders.	Noted. The paragraph references the need for the County Council to consider factors associated with a skewed (aging) population and whether different approaches rather than higher standards might be needed.	Review Report	Noted, No change proposed
		Para 7.21 Although the economic downturn may have affected the early years of the plan the paragraph should also talk about the improved environment in recent years particularly since the introduction of help to buy.	Housing completion figures in Ceredigion have not demonstrated significant and sustained improvements	Review Report	Noted, No change proposed
		Para 7.24 the document suggests the need to reduce the housing requirement based on recent WG figures, but if the Council is saying the area is still in an economic downturn then planning future	Recent population and housing projections have provided clear evidence that the assumptions, on which calculations of housing need and supply were based, were significant overestimates. Work is proposed that will define the housing	Review Report	Noted, No Change proposed

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		growth based on past performance would surely be to plan for continued under delivery and failure of the plan.	need for the replacement Plan, adjusting for the over estimates and taking into account the impact of the County's economic ambition		
		Para 7.22 The HBF would suggest that in reality this is not the case and the current wording paints a picture that suggests new housing will be built everywhere. In reality the need for a site to be policy compliant, other than the fact is not an allocated sites, means that most sites coming forward directly as a result of a lack of a five year land supply are likely to be sustainable. Some additional wording should be added to this paragraph to make it more balanced.	The paragraph clearly references policy compliance in setting out the position regarding an 'under 5 year' housing land bank.	Review Report	Noted, No Change proposed
		Para 7.29 The phrase 'in balance' needs to be explained.	This is explained in section 6 – The Strategy and 'S' Policies In particular Policy S04, paragraphs 6.160- 168 and the box headed 'Applying Criteria 2'	Review Report	Noted, No Change proposed
		Para 7.31 The statement 'where action to impose completion would be difficult	The County Council has specific mechanisms under the adopted LDP for short dated consents and to	Review Report	Noted, No Change proposed

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		to justify' should be explained/justified. The LPA do have the power to do this under the planning Act.	impose completion dates. For those consents not constrained by such mechanisms, it may not be expedient to pursue completions using powers under the Planning Acts, given that this may prove resource intensive.		
		Para 7.39 The HBF does not consider the WG 20,000 affordable home target relevant to this section of the document. Note that target is made up of different elements including 6,000 private help to buy units and units delivered through the innovative housing fund. If it is being used to justify asking for more affordable homes the breakdown of the type of units within the total should be explained.	<p>The Council considers reference to WG target to increase the supply of affordable homes acceptable, as part of the economic and social context for progressing the replacement plan, recognising that pressures to increase affordable housing have increased since preparation of the adopted plan.</p> <p>There will be opportunities , at Preferred Strategy and Deposit Plan stages to comment on the emerging strategy and policies</p>	Review Report	Noted, No Change proposed
		Para 8.6 The HBF suggest that the wording should include reference to aligning policies with Powys where ever possible as the Powys Plan will soon be adopted so will have recently been tested so is the most up to date plan in Wales.	The Council proposes to work collaboratively on evidence base and on cross boundary matters, as appropriate; policies will be locally distinctive	Review Report	Noted, No Change proposed

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		Page 32 Under bullet point 'Will the plan deliver?' It states 'These issues are compounded by the general slowdown in the house building industry UK wide'. This too general a comment with many statistics showing the housebuilding has been on the increase for the last few years. In Wales the new homes built has increased from 5575 2011-12 to 6833 in 2016-17 over 18% If there is a local issue this should be identified using published statistics.	This paragraph identifies the local issues that do not fit neatly with the national planning agenda.	Review Report	Noted, no change proposed
6.	Respondent 6	Student accommodation in relation to wider housing policy issues - particularly in Aberystwyth locality. Aberystwyth University has relied on the local private rented sector to satisfy a large proportion of its student housing requirement. Both as a result of shrinking student numbers (See 'risks', para. 6.2, Table 2) and due to the substantial increase in	Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability. This will include looking at matters associated with provision of student housing as compared with general housing.	Review Report	To include this report as an annex to the RR, referencing: <ul style="list-style-type: none"> <li>• Student housing provision and the relationship with general housing</li> </ul>

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		<p>purpose built University accommodation, this is changing. It must therefore make sense to treat the student component of future housing requirement as a separate entity, requiring more detailed analysis than heretofore. Important that the planning authority has a full understanding of the requirement for student accommodation and the effect of student housing demand on the general availability of housing in the community at large.</p> <p>Lack of student satisfaction with current University accommodation. Widespread belief that recently built University units in particular, are operating with high levels of vacancy. It seems probable that the university will need to take steps to rectify this in the future. Any success in this, along with any further decline in student numbers, is likely to result in a further reduction</p>			

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		<p>in demand for student housing elsewhere in the town. This will in turn have the effect of increasing the supply of housing available for the 'non student' population and thereby decreasing the need for new construction.</p> <p>Please ensure that this point is included in the LDP Review and taken account of in future planning considerations.</p>			
		<p>Provision of affordable homes through the planning system Reached the stage where the downsides of this policy are so widely appreciated that a full review is necessary. Policy restricts development by the small scale developers who are shown by the Review ( para. 7.18) to be the segment most likely to provide new housing. They are ill equipped to cope with the complexity of existing arrangements, their financial consequences and in</p>	<p>Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability.</p> <p>This will include Affordable housing policies on which there will be an opportunity to comment at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.</p>	RR	<p>To include this report as an annex to the RR, referencing:</p> <ul style="list-style-type: none"> <li>• Affordable Housing</li> <li>• Deliverability</li> </ul> <p>as considerations in progressing and delivering the replacement plan</p>



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		<p>particular with the financial risk of being unable to sell 'affordables' when they are completed. This unsatisfactory state of affairs is encapsulated in 7.37, which reports ' In terms of single unit affordable dwellings, the County has almost 500 outstanding consents for affordable units with little prospect of being delivered as the immediate unmet need they were intended to meet has not materialised.'</p> <p>From the viewpoint of intending purchasers, the situation is also far from ideal as they are being invited to commit to a purchase that will probably entail higher than average mortgage costs and leave them as owner of a property subject to extremely restrictive constraints on resale.</p> <p>Look at new affordable housing options, e.g. rental purchase, either in addition to</p>			

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		existing schemes, or better as a replacement for them. A rental purchase scheme could make purchase of any suitable property a realistic prospect for many who now struggle with an aspiration to own their own home, without needing to face the prospect of future restricted resale options. Depending on scheme details, developers could be freed of the constraints that arise from the need to pre-specify which properties would be 'affordable', as any suitably priced property could be included within such a scheme.			
7.	Respondent 7 Cardigan Island Coastal Farm Park & Camping	Provision for tourism opportunities, and more particularly that of tourist accommodation (item 7.49 of the Ceredigion Local Development Plan of the Review Report)  Blanket ban for many kinds of development on the coastal	Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability and the Council's commitment to improving prosperity. As part of the evidence base for decision making the Council will be improving its evidence on landscape and environmental capacity to assist in decision making.	Review report	To include this report as an annex to the RR, referencing: <ul style="list-style-type: none"> <li>Tourism and Landscape / environmental capacity as considerations in progressing and delivering the replacement plan</li> </ul>

	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		<p>side of the A487, notably for static caravan sites and for touring caravan sites. Admittedly there is some good reason for the ban on caravan sites. Many areas of the Ceredigion coastal region where very little development has taken place, and a well-designed lodge-style park would certainly be in-keeping with a desire for more up-market tourist accommodation. Ban on touring caravan sites should be reconsidered, at the least to provide assessment on a case-by-case basis, as not permanent structure. Some areas have a dearth of tourist accommodation, and the temporary nature of touring caravan sites cannot be seen as a permanent blot on the landscape. Could take in to account the current viability, with regards to existing infrastructure as against completely new site creation.</p>	<p>There will be an opportunity to comment at Preferred Strategy and Deposit Plan stages and to input suggestions</p>		
8.	Respondent 8	My main concerns involve	Full Review of the Plan is proposed,	RR	To include this report as an

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		<p>housing, tourism and agriculture.</p> <p>Two main wealth-producing industries of Ceredigion, are agriculture and tourism. And many of subsidiary supply and service industries rely on these.</p> <p>Agriculture and tourism are inextricably entwined, many farmers and landowners are also tourism operators in some way or another. Farmers are frequently involved in a great variety of enterprises, including tourism, tourism accommodation &amp; food production, which will also benefit from an increase in broadband is speeded up in rural areas. Without diversification many farmers would simply not survive, since agricultural food prices generally, are virtually controlled by the UK's large multi-national supermarkets.</p> <p>Post-Brexit things could become much ,much tougher for the whole agricultural</p>	<p>within the context of increasing emphasis on deliverability and the Council's commitment to improving prosperity.</p> <p>Brexit is noted in the Review Report as an issue. Progress with Brexit will be tracked as context for the emerging plan.</p> <p>As part of the evidence base for decision making the Council will be improving its evidence on landscape and environmental capacity to assist in decision making alongside updating evidence on affordable housing and renewable energy. There will be an opportunity to comment at Preferred Strategy and Deposit Plan stages and to input suggestions.</p>		<p>annex to the RR, referencing:</p> <ul style="list-style-type: none"> <li>• Tourism and Landscape / environmental capacity</li> <li>• Affordable housing</li> <li>• Renewable energy</li> <li>• Brexit</li> </ul> <p>as considerations in progressing and delivering the replacement plan</p>

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		<p>economy of Wales and all its dependent ancillary services, support industries</p> <p>How would the Welsh language and culture fare without the back-bone of Welsh farming community?</p> <p>At present, the LDP places severe constraints on the expansion of tourism, west of the A487 road, running north/south through Ceredigion. Over development in a few prominent coastal locations in the past has caused stiff strictures to be applied. That policy has been grossly unfair to those coastal locations that have remained virtually undeveloped.</p> <p>In the interests of the county's future economy, this policy should be reviewed and some development be permitted at carefully selected sites that do not impinge on scenic beauty or on neighbouring</p>			

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		<p>properties. The A487 rule does not take account of the fact that some areas west of the A487 have far less development than others. Different policy should be applied to luxury lodges with an attractive natural timber look. If more of these luxury lodges were made available on a 10 months per annum residency rule in selected coastal areas where there is great demand, and where, currently, This would reduce the number of people buying dwellings as holiday homes which are currently being bought up in large numbers as holiday homes, which are then kept empty for much of the year. It would help retain our coastal towns and villages as vibrant Welsh communities all year round</p> <p>I note from Technical Advice Note 1. Joint Housing Land Availability Studies [ January 2015] , paragraph 7.13 ,that there has been a substantial shortfall in housing</p>			

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		<p>completions in Ceredigion in recent years. One of the main reasons ,in my opinion, is that there are strictures on the coastal belt, west of the A 487, where demand is obviously at the highest level in the county.</p> <p>Paragraph 7.53 of the current LDP-----"Renewable Energy Aspirations" states that these renewable energy aspirations are not being fully implemented by Planning Authorities. May I suggest that well-insulated luxury lodges in coastal locations could also involve solar power to partially power them ? This would then help fulfil these "renewable energy aspirations."</p>			
9.	Respondent 9 C C Beulah	<p>Present LDP strategy &amp; allocations to settlements confusing and complex. Local member been requested to take 90% of applications to committee as they had been assessed by planners for refusal.</p>	<p>Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability and the Council's commitment to improving prosperity.</p> <p>The Council is committed to delivering a more readable Plan, focussed more on people, places and</p>	RR	<p>To include this report as an annex to the RR, referencing:</p> <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Settlement Strategy</li> <li>• Live/ Work ventures as considerations in progressing and delivering</li> </ul>

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		<p>No need for 25 unit development in Cenarth, but development needed in village communities Beulah, Betws Ifan, Llandygwydd &amp; Cwmcou which has benefited the communities. The Tai Ceredigion development in Cenarth will take 4-5 years. Should be a bank of allocations to the ward that would allow young people &amp; the elderly to build in their home community.</p> <p>The Council now proceeding with survey of need – new housing should be defined by need. Planning Policy Wales will be the Guidance on handling the provision to meet local needs.</p> <p>Feel the LDP should be more positive to assisting businesses in the ward as there have been problems with development of live work ventures.</p> <p>The Council supports Affordable Housing in the ward. Wish to see a mix of housing as ward open to</p>	<p>environment.</p> <p>There will be opportunities to comment in more detail at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.</p>		<p>the replacement plan</p>



	<b>Respondent</b>	<b>Issue Raised by Respondent</b>	<b>Agreed Council position</b>	<b>Delivery Agreement or Review Report</b>	<b>Change to Delivery Agreement / Review Report</b>
		retired persons who are outside the Affordable Housing criteria.			
10.	Respondent 10 Dwr Cymru Welsh Water	Note that the Review Report identifies that the housing element of the LDP is not currently delivering at the required pace and that strategic policies need reconsideration. Accordingly, we will continue to update the LPA with regard to our Asset Management Plan (AMP) process, which sets out our capital investment over 5 year rolling periods – the current AMP6 period is 2015-2020. DCWW utilise the growth contained within LDPs to inform the AMP process capital investment in our infrastructure, we will continue to work closely with the LPA and feed into the Review process at the key consultation stages. Engagement at the earliest possible stage with regard to the settlement strategy and proposed growth will assist in	Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability and the Council's commitment to improving prosperity. The Council is committed to delivering a more readable Plan, focussed more on people, places and environment. There will be opportunities to comment in more detail at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.  AMP updates form a valuable part of the evidence base, assisting with the assessment of deliverability	RR	To include this report as an annex to the RR, referencing: <ul style="list-style-type: none"> <li>• Housing delivery</li> <li>• Infrastructure provision</li> <li>• deliverability</li> </ul> as considerations in progressing and delivering the replacement plan

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		the LPA being able to understand where there are potential capacity constraints, and from our perspective the areas we need to consider for capital investment.			
11.	Respondent 11	Land to include in LDP in Beulah	There will be opportunities to comment in more detail comment at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.	RR	Noted, no change proposed
12.	Respondent 12 <i>Swyddog Maes Dyfed Cymdeithas yr Iaith</i>	Review Report indicates that there is less population growth than was projected for the creation of the existing LDP. This suggests that there will be less housing need in the future. The need to plan and build the houses as required on a small scale rather than more developments in service centres. Housing should not be seen as a way of encouraging growth in the local economy, nor as a way of enabling people to stay locally.	There will be opportunities to comment in more detail at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.	RR	To include this report as an annex to the RR, referencing: <ul style="list-style-type: none"> <li>• Availability of small scale local housing</li> <li>• Housing to meet local needs</li> <li>• The Sustainability of developing in Service Centres</li> <li>• Increasing the percentage of affordable housing</li> <li>• Revising / changing</li> </ul>
		Need to ensure that local	Full Review of the Plan is proposed,	RR	

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		needs are prioritized for housing rather than developer aspirations as building and selling houses are their main consideration rather than the sustainability of communities	<p>within the context of increasing emphasis on deliverability.</p> <p>This will include Affordable housing policies on which there will be an opportunity to comment at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.</p>		
		The creation of Service Centres therefore undermines the sustainability of communities, and conflicts with two of the three main principles for the future set out in Section 3 of the Report, namely supporting families and enabling people to live independently. And young people want to live in their home villages.		RR	
		Suggest that the affordable housing target be revisited, with a view to increasing the percentage of affordable housing			

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		<p>Recommend revising and changing Welsh language policies to assess the impact of each development on the Welsh language</p> <p>Welsh language should be considered under the Appraisal of Sustainability. It should be ensured that language planning specialists are involved.</p>	<p>Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability.</p> <p>This will include Language Impact Assessments in accordance with TAN 20.</p>	<p>RR</p> <p>RR</p>	<p>Noted, no change proposed</p>
		<p>Working with other local authorities it is important that Welsh is the core of developments such as the city-region plan;</p> <p>and that Ceredigion Council administers in Welsh so that other authorities can follow an example</p> <p>Suggest that public open sessions on the LDP are in addition to what has been identified, especially when consultation on the new draft plan. They could be arranged through county councillors in their areas.</p> <p>Knowledge and development</p>	<p>Ceredigion is within the Growing Mid Wales Partnership and, as such, is not part of the Swansea City Deal.</p> <p>All public documents will be published in Welsh and English, enabling people to engage with the Plan in their language of choice</p> <p>Noted. Public sessions will be carried out in accordance with the Delivery Agreement, will be arranged by officers and may have county Councillors in attendance</p>	<p>RR</p> <p>DA</p> <p>DA</p>	<p>Noted, no change proposed</p> <p>Noted, no change proposed</p> <p>Noted, no change proposed</p>

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		awareness is generally low so everything should be done so that people can be involved and give opinions on decisions			
		In gathering evidence, a study on the impact of development and in-migration on Welsh communities should be carried out. Given that the period of the current LDP is very short the previous UDP should be taken. Cymdeithas yr Iaith has called on the Welsh Government to do, and we recommend that Ceredigion council also calls for this		RR	To include this report as an annex to the RR, referencing: <ul style="list-style-type: none"> <li>• Impacts of Development and in-migration on Welsh Communities</li> </ul>
13.	Respondent 13	Is enough being done and all avenues being explored to facilitate the completion of outstanding permissions or is it that options are so limited that it is time for authorities to press urgently for changes to facilitate, especially those in our urban and rural centres, where they are needed.	The Council is committed to improving deliverability of sites, rather than just delivering Planning consents with a combination of short date conditions and, where appropriate, completion dates	RR	Noted, no change proposed
		Are these sites are likely to be in rural linked settlements which have already seen	Full Review of the Plan is proposed, within the context of increasing emphasis on deliverability and the	RR	To include this report as an annex to the RR, referencing:

	Respondent	Issue Raised by Respondent	Agreed Council position	Delivery Agreement or Review Report	Change to Delivery Agreement / Review Report
		over-development, have little or no access to public transport, lack cycle/footways, encouraging increased car use.	Council's commitment to improving prosperity. The Council is committed to delivering a more readable Plan, focussed more on people, places and environment.		<ul style="list-style-type: none"> <li>Sustainability of rural settlements as considerations in progressing and delivering the replacement plan</li> </ul>
		Will "new sites" really meet "local housing demand?" or demand from outside the County	There will be opportunities to comment in more detail at Preferred Strategy and Deposit Plan stages and to input suggestions for allocations in the Council's 'Call for Candidate Sites'.	RR	