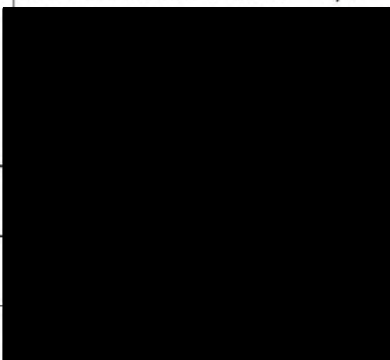


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	 CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL	For office use only: Representor No. Date received: 27/1/17 en Date acknowledged:
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o 	
Postcode		
Telephone Number		
Email address		

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?	
	CPRW 35 Employment Sites
Policy number (please specify)	PS10/ CYF1 /CYF4
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	☐	Supporting	☐

35. Employment Sites

35.1 Para 7.3.1. The first 2 bullet points seem not to be relevant to major infrastructure.

35.2 **PS10.** We agree with Gwynedd Council's aim to safeguard adequate employment land and ensure a geographical spread of employment opportunities. Two land availability studies are quoted, one of which (7.3.23) revealed an '*excess of existing employment land that is **unlikely** to meet the requirements of modern business*', while another (7.3.24) concludes '*that there is sufficient employment land across the area which is evenly distributed*'. Some comment is needed on the conclusion the Plan draws from these alternative views.

35.3 **CYF1. Safeguarded Employment Land.** It is noted that PS10 requires 807ha of employment land to be safeguarded throughout the Plan area, of which CYF1 suggests some 472 ha are registered as vacant including reserve areas, enough for 40-50ha/year over a 10 year plan period, leaving aside any windfall sites. At the same time para 7.3.27 notes there has been a traditional rate of take-up of employment land within the Plan area of 4 ha per annum, while the Plan provides for a precautionary rate of 6 ha per annum. Some comment is required on the difference between the safeguarded amount and the target take-up rate.

35.4 **CYF4** provides for release of safeguarded sites for **alternative use** only in **special circumstances**. We think this policy should be more flexible in allowing, for example, alternative use of safeguarded employment sites for housing if suitable opportunities arise. Some sites originally proposed in the GUDP for employment have now been either deleted or switched to housing which implies a degree of flexibility. 7.3.35 notes that some traditional employment sites have been dormant: an example is the Afon Wen old laundry site where a housing proposal was recently refused (see CPRW 32).

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words). PS10 Comment on conclusion of needs for employment land from alternative studies. CYF1 Comment on difference between safeguarded amount and target take-up rate of employment land. CYF4 More flexibility sought in alternate use of sites.																			
2d. Please detail the changes you wish to see made to the Deposit Plan.																			
2dd. Is the Deposit Plan sound? Yes ☐ No ☐																			
2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). <i>More details are provided at the back of this form.</i>																			
Procedural				Consistency								Coherence & Effectiveness							
P1	☐	P2	☐	C1	☐	C2	☐	C3	☐	C4	☐	CE 1	☐	CE 2	☐	CE 3	☐	CE 4	☐



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received: 31/3/15
Ebon

Date acknowledged:

Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 Representation Form

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	First Investments Ltd	DPP One Ltd (Jonathan Burns)
Address		
Postcode		
Telephone Number		
Email address		

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary.
Separate forms should be completed for each comment that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp in the leaflet 'Guidance about alternative sites'.

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	CYF4
Paragraph number (please specify)	N/A
Proposals/ Inset Map (please specify ref no.)	N/A
Constraints Map	N/A
Appendices (please specify)	N/A

2b. Are you objecting or supporting the Deposit Plan?

Objecting	☒	Supporting	☐
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2c. Please provide details of your representation on the Deposit Plan.

Our client, First Investments Ltd (FIL), owns and manages the existing Peblig Mill Industrial Estate in Caernarfon; south of the A4085 (Llanbeblig Road). Whilst FIL welcome the inclusion of a policy which permits alternative uses of employment sites where certain criteria are met, FIL object to the draft wording of this Policy which fails to take into account how alternative uses on part of a site can help to deliver significant improvements to existing employment sites and deliver the vision and aims of the draft LDP.

As already highlighted with our representations on draft Policy CYF1, and the LDP Evidence Base, the industrial estate has a high proportion of vacancies with 44% of the total floorspace vacant. The buildings on the site are old and are generally in need of significant investment/redevelopment to bring them up to modern standards capable of attracting new businesses onto the site.

Whilst the criteria set out within the draft policy is suitable for small scale alternative uses, it does not adequately address proposals which seek the partial redevelopment of an existing employment site for non-employment uses in order to deliver a viable redevelopment of the remainder of the site to deliver an improvement to the quality of the employment site.

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

FIL object to the draft wording of this Policy which fails to take into account how alternative uses on part of a site can help to deliver significant improvements to existing employment sites and deliver the vision and aims of the draft LDP.

The criteria set out within the draft policy may be for small scale proposals however, it does not adequately address proposals which seek the part redevelopment of an existing employment site for non-employment uses in order to deliver a viable redevelopment of the remainder of the site to secure an improvement to the general employment quality/offer of the site.

2d. Please detail the changes you wish to see made to the Deposit Plan.

FIL request that the policy be amended to include the following changes;

- Create a further independent criterion which deals with poor quality employment sites, e.g. Peblig Industrial Estate, to permit alternative uses and the loss of some employment land where such development could deliver improvements to the remaining floorspace.

2dd. Is the Deposit Plan sound?

Yes ☐ No ☒

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	☐	P2	☐	C1	☐	C2	☐	C3	☐	C4	☐	CE 1	☐	CE 2	☒	CE 3	☐	CE 4	☒

PART 2: Your Comments and Suggested Changes. *(Please use one Part 2 section for each comment that you wish to make)*

2a. Which part of the Deposit Plan are you commenting on?

Policy number <i>(please specify)</i>	GWA1
Paragraph number <i>(please specify)</i>	N/A
Proposals/ Inset Map <i>(please specify ref no.)</i>	N/A
Constraints Map	N/A
Appendices <i>(please specify)</i>	N/A

2b. Are you objecting or supporting the Deposit Plan?

Objecting	☒	Supporting	☐
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2c. Please provide details of your representation on the Deposit Plan.

Our client, First Investments Ltd (FIL), owns and manages the existing Peblig Mill Industrial Estate in Caernarfon; south of the A4085 (Llanbeblig Road). The draft Policy currently identifies 'part of Peblig' as a Waste Management Site' however there are no details as to which site this actually relates to and there is no such allocation shown on the draft Proposals Map. As such, it is requested that the local planning authority clarify which site 'Part of Peblig' refers to. Following this confirmation, FIL reserve the rights to make further comments on this draft Policy if it affects their land interests.

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

N/A

2d. Please detail the changes you wish to see made to the Deposit Plan.

FIL first request confirmation as to which site the Council is seeking to allocate as a 'Waste Management' site as the current draft Proposals Map does not highlight this. Following this confirmation FIL reserve the right to provide further comment if the land in question is within their ownership.

2dd. Is the Deposit Plan sound?

Yes	☐	No	☒
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2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	☐	P2	☐	C1	☒	C2	☐	C3	☐	C4	☐	CE 1	☒	CE 2	☒	CE 3	☒	CE 4	☐

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	TAI14
Paragraph number (please specify)	N/A
Proposals/ Inset Map (please specify ref no.)	N/A
Constraints Map	N/A
Appendices (please specify)	N/A

2b. Are you objecting or supporting the Deposit Plan?

Objecting	☒	Supporting	☐
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2c. Please provide details of your representation on the Deposit Plan.

Our client, First Investments Ltd (FIL), believes the level of assumed housing provision through allocated sites and assumed windfall sites within Caernarfon is too low and does not recognise the importance of the town as the largest Urban Service Centre (by population) within Gwynedd. The current draft policy allocates land for just 194 dwellings over the plan period, which equates to just 2.7% of the Council's assumed requirement, taking account of the assumed windfall sites within Caernarfon (190 dwellings), the town will still only provide 5.3% of the LDP's planned housing provision.

Putting this into context; based on the figures provided within 'Topic Paper 3: Population and Housing' Caernarfon, is currently home to 16.4% of the population living within the main centres of Gwynedd and Anglesey (a total of 58,767). Given that the main centres are the focus for growth within Gwynedd and Anglesey it is questionable why only 5.3% of the LDP's planned housing provision is focused on such an important Urban Service Centre.

It is also notable that based on the housing completion figures within the 'Topic Paper 3: Population and Housing' (Tables 8.1), the Caernarfon sub-area delivered 12.6% of the total housing completions between 2001-2014 for Gwynedd and Anglesey, and 26% of housing completions within Gwynedd. This highlights the level of demand both from the local housing market and the level of interest from residential development within the town over recent years. Such a significant drop in assumed completions of the next LDP plan period (down to just 5.3%) is questionable and it is considered that this reduction will have a negative impact on the future growth of Caernarfon and the LDP's ability to deliver the level of planned housing provision across the area.

This low level of housing provision within Caernarfon will also fail to make the most of the opportunity created by the planned A487 Caernarfon to Bontnewydd bypass and its ability to drive economic and population growth.

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

Our client, First Investments Ltd (FIL), believes the level of assumed housing provision, through allocated sites and assumed windfall sites within Caernarfon is too low and does not recognise the importance of the town as the largest Urban Service Centre (by population) within Gwynedd. Such a significant drop in planned housing completions over the next LDP plan period (down to just 5.3%) is questionable and it is considered that this reduction will have a negative impact on the future growth of Caernarfon and the LDP's ability to deliver the level of planned housing provision across the area.

2d. Please detail the changes you wish to see made to the Deposit Plan.

It is requested that growth across the Urban Service Centres is more evenly distributed to take account of existing population concentrations and that the ability of Caernarfon to act as an Urban Service Centre and focus for housing growth. As such the level of housing allocations within Caernarfon should be increased and this should include part of the Peblig Mill Industrial Estate owned by FIL in order to help deliver the redevelopment of the remainder of the site for employment purposes whilst delivering new homes in a sustainable, brownfield location.

2dd. Is the Deposit Plan sound?

Yes	☐	No	☒
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2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	☐	P2	☐	C1	☐	C2	☐	C3	☐	C4	☐	CE 1	☒	CE 2	☒	CE 3	☐	CE 4	☒

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.



I want to speak at a hearing session.



3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

FIL would like to be represented based on their comments relate to Policies CYF1, CYF4, GWA1 and TAI14. This is requested as FIL has significant concerns regarding these policies and the potential of these policies to stifle development on their site and failure to positively plan for economic and housing growth within Caernarfon.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



If additional documents have been provided to support your representations, please list below:

Signed:



Dated: 31/03/15

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

Completed representation forms should be returned to the Joint Planning Policy Unit at:

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp **BY EMAIL** – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March
2015 REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of "*showing good judgement*" and "*able to be trusted*". To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector's job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the 'consistency' and the 'coherence and effectiveness' tests.

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
				<u>Newydd Project or are measures to provide mitigation to potentially adverse effects; and</u> • <u>if the Wylfa Newydd Project does not come forward, the sites can be restored or reinstated or will provide a beneficial legacy</u>
32.	Chapter 7 Managing growth and Development – Economy and regeneration	Strategic Policy PS10, CYF1 and CYF2	Horizon has concerns about the lack of flexibility for the sites in these policies regarding the sites to be used for non-employment related development (B1, B2 and B8), particularly in relation to a change of use for legacy (e.g. to tourism) as this would reduce the overall availability of B1, B2 and B8 sites and therefore run counter to the intention for these to be employment sites. However, rather than seek for specific amendments to policies PS10, CYF1 and CYF2 however, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.	
33.	Chapter 7	Policy CYF4	Horizon considers it is not clear how	

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Managing growth and Development – Economy and regeneration		the criteria of this policy would need to be met in order for land to be released and notes that it is not clear what evidence will be acceptable to the Councils in proving conformity to the policy. However, rather than seek for specific amendments to policy CYF4, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these policies.	
34.	Chapter 7 Managing growth and Development – Economy and regeneration	TWR1	Clarification is required as to what is meant by "development boundary". Rather than seek for specific amendments to policy TWR1, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which will be the relevant policies against which to determine its associated development applications. For this reason Horizon is not proposing specific exclusion of its associated development from these	