

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)	CYF1
Paragraph number (please specify)	7.3.25
Proposals/ Inset Map (please specify ref no.)	C19
Constraints Map	N/A
Appendices (please specify)	N/A

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

Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>
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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) and object to draft Policy CYF1 which identifies the site as a secondary employment site. This objection is not a fundamental objection to the allocation of the site for employment uses but instead objects to the lack of flexibility within the Policy for alternative, uses, the lack of support for the sites future redevelopment and any viability related issues related to this. The reasons for this objection are as follows:

1. Need for redevelopment and viability
2. Conflicts with the findings of the evidence base (Employment Land Supply Study)
3. Failure to properly consider the site in Topic Paper 1A: Assessing the Candidate Sites.

The following sets out our detailed reasons for objection.

1. Need for redevelopment and viability

The industrial estate within FIL's ownership (i.e. to the south of Llanbeblig Road) has a high proportion of vacancies with 44% of the total floorspace vacant, despite being actively marketed. 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. This issue is highlighted in the Economic and Employment Land Review Study (2012) which forms part of the Council's evidence base making the following observations about the industrial estate;

'Vacant land located on existing industrial estate in Caernarfon. Existing buildings are currently in a state of disrepair and would need to be either repaired/demolished to accommodate new development. Viability for employment development is highly likely to prevent redevelopment in the short to medium term. Potential for residential development exists on the site.'

Continued on next sheet (2 additional sheets)

Given this, FIL have held a number of pre-application discussions over recent years with Gwynedd Council with a view to progressing a planning application for an alternative (non-employment) use on part of the site in order to support/help deliver the redevelopment of the remainder of the site for purpose built, modern industrial/warehousing units capable of attracting new businesses to the site. However, no application has been submitted to date.

Nevertheless the focus of this objection is that the wording of this draft policy does not take into account the current issues of vacancy at the industrial estate nor does it take account of the findings of the Economic and Employment Land Review Study (2012) which highlights viability issues regarding the potential to redevelop the site. The retention of this policy, which provides a blanket restriction on alternative non 'B-class' employment uses, will only maintain the 'status quo' for this industrial estate. The Policy does not provide any support for improvements or regeneration of the site with the LDP giving preference instead to new development elsewhere within the Gwynedd area, and in some cases on greenfield sites.

The identification of the site as a 'secondary employment site' highlights this point and it is considered that there is no justification for the hierarchical approach taken to employment land in the area, particularly as the definition of 'Secondary Sites' does not fit with the definition set out within the evidence base, as highlighted later on in these representations. Whilst FIL appreciate the need to provide a variety of different employment space provision across the market, some of which may be in older building stock, this should not be at the expense of holding back existing employment sites from investment and redevelopment.

The impact of the new bypass road, which will significantly improve accessibility to the Cibyn Industrial Estate and therefore its attractiveness to potential occupiers, is also likely to have a further negative impact upon the Peblig Industrial Estate. This further highlights the need for some intervention and investment at Peblig in order to provide floorspace capable of attracting new businesses to the site and ensure that the site contributes to the local economy and is able to promote further economic development.

As such, it is considered that the LDP does not positively plan for this site and the current site allocation will only serve to, at best, retain the 'status quo' for this site (i.e. high vacancies and poor quality employment space) and, at worst, will result in ever increasing vacancies.

2. Conflicts with the findings of the evidence base (Employment Land Supply Study)

As already highlighted the Economic and Employment Land Review Study (2012) considers the Peblig Mill Industrial Estate stating that;

'Vacant land located on existing industrial estate in Caernarfon. Existing buildings are currently in a state of disrepair and would need to be either repaired/demolished to accommodate new development. Viability for employment development is highly likely to prevent redevelopment in the short to medium term. Potential for residential development exists on the site.' (Appendix 9)

And;

'Feasibility required to determine deliverability and viability to retain site for employment use' (Table 9.2)

Whilst it is unclear whether these comments relate to the whole of the industrial estate, which is assumed to be the case given the reference to buildings on the site, there is a clear recognition within the Evidence Base for the LDP that there are real concerns about the viability of any potential future development on the site and even the site's ongoing retention as an employment site. These concerns are shared by FIL and it is alarming that draft Policy CYF1 which designates the site as a 'Secondary Employment Site' fails to take account of this and does not seek to address the issues raised.

In addition to this, the definition of 'Secondary (employment) Sites' at the explanatory text (paragraph 7.3.25) differs from the definition highlighted within the Evidence Base (Employment Land Supply Study) which describes 'Secondary Sites' as;

'Secondary sites - in inferior locations in terms of access/market presence compared with prime sites but they retain an important role as they represent opportunities that are highly relevant to the Energy Island Programme or serve a local need in more remote or rural areas' (Para 10.3.1)

We are unable to find any justification for the change in 'Secondary Sites' definition and believe that this should be reviewed

3. Failure to properly consider the site in Topic Paper 1A: Assessing the Candidate Sites.

The site in question appears in Topic Paper 1A: Assessing the Candidate Sites twice, the second assessment (Late Submissions) states the proposed use is 'Housing' however this does not properly consider the site submission form, submitted by DPP on behalf of FIL in January 2014 which promoted the site for a mix of employment and housing uses (rather than solely housing as stated in the Topic Paper). This matter should be clarified.

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

FIL object to the current wording of this policy which, instead of promoting investment and improvements to existing employment space, will result in, at best, retaining the status quo at Peblig Mill Industrial Estate owned which is characterised by old and, in some cases, defunct employment floorspace with a high proportion of vacancies. The policy should instead promote investment in existing employment stock and where necessary, promote alternative uses on the Peblig site that are capable of delivering investment and improvements to the overall quality of employment floorspace.

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;

- Recognise the viability and vacancy issues in relation to this site and support the redevelopment of existing sites in need of investment;
- Promote alternative uses where they are able to support such redevelopment/investment at the Peblig site potentially through a link to an amended draft Policy CYF4;
- Remove hierarchal approach to employment allocations, particularly given the differences in definitions between the Evidence Base and Draft Policy

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	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

	 <p>CYNGOR SIR YNYS MON ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p><i>Representor No.</i></p> <p><i>Date received:</i></p> <p><i>Date acknowledged:</i></p>
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**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.

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	D. GRIFFITHS	
Address	WELSH WATER	
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.

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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.

→ + common Ref-sets

PS10 Providing opportunity for flourishing economy

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

Please use additional sheet if necessary.
Please state how many additional sheets have been used.....

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

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

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2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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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	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

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.

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

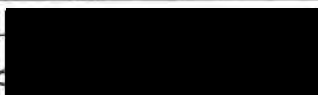


Plan's adoption



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

Signed:



Dated:

31/3/15

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.

- 1634 {
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
 - The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C17 Felin Fawr, Bethesda

- 1635 {
- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
 - Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
 - Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

C18 Tanygrisiau site, Blaenau Ffestiniog


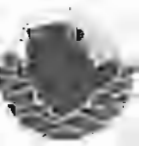
- 1636 {
- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
 - The public sewerage network can accept the domestic foul flows arising from this development area.
 - Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C19 Peblig, Caernarfon

- 1637 {
- Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
 - Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
 - The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C20 Former site of Dynamex, Caernarfon

- 1639 {
- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
 - An extensive distance of off-site sewers would be required to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
- 1640 • If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p><i>Representor No.</i></p> <p><i>Date received:</i></p> <p><i>Date acknowledged:</i></p>
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Postcode		
Telephone Number		
Email address		

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Policy number (please specify)	PS10
Paragraph number (please specify)	Providing opportunity for
Proposals/ Inset Map (please specify ref no.)	favourable economy,
Constraints Map	
Appendices (please specify)	

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

Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>
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2c. Please provide details of your representation on the Deposit Plan.

Please use additional sheet if necessary.
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Yes

☐

No

☐

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I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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.

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

Submission of documents and evidence to the examination	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>
Plan's adoption	<input checked="" type="checkbox"/>

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

Signed: 	Dated: 31/3/15
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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.

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1634

- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C17 Felin Fawr, Bethesda

1635

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

C18 Tanygrisiau site, Blaenau Ffestiniog

1636

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- The public sewerage network can accept the domestic foul flows arising from this development area.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C19 Peblig, Caernarfon

1637

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.


C20 Former site of Dynamex, Caernarfon

1639

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- An extensive distance of off-site sewers would be required to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).

1640

- If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p><i>Representor No.</i></p> <p><i>Date received:</i></p> <p><i>Date acknowledged:</i></p>
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**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	D. GRIFFITHS	
Address	WELSH WATER	
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

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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.

7 + number left: 1



*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

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

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

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2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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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	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

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.

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:

[Redacted Signature]

Dated:

31/3/15

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.

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1634

- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C17 Felin Fawr, Bethesda

1635

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

C18 Tanygrisiau site, Blaenau Ffestiniog

1636

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- The public sewerage network can accept the domestic foul flows arising from this development area.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C19 Peblig, Caernarfon

1637

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.

1638

- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
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C20 Former site of Dynamex, Caernarfon

1639

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- An extensive distance of off-site sewers would be required to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).

1640

- If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p><i>Representor No.</i></p> <p><i>Date received:</i></p> <p><i>Date acknowledged:</i></p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
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PART 1: Contact details

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Address	WELSH WATER LATER	
Postcode		
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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.

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7 + common leaflets

PS10 Providing opportunity for flourishing economy

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

Please use additional sheet if necessary.
Please state how many additional sheets have been used.....

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

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). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

Part 3: What Happens Next?

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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.	<input checked="" type="checkbox"/>
I want to speak at a hearing session.	<input type="checkbox"/>

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.

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

Submission of documents and evidence to the examination	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>
Plan's adoption	<input checked="" type="checkbox"/>

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

Signed: 	Dated: 31/3/15
---	----------------

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.

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Test of Soundness

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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.
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1634

- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- The proposed growth being promoted for this settlement would require improvements at Treborth Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C17 Felin Fawr, Bethesda

1635

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- Tregarth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

C18 Tanygrisiau site, Blaenau Ffestiniog

1636

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- The public sewerage network can accept the domestic foul flows arising from this development area.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C19 Peblig, Caernarfon

1637

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area. This site is crossed by a water main which will restrict development density for the site. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- Potential developers need to be aware that the site is crossed by a sewer. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1638

C20 Former site of Dynamex, Caernarfon

1639

- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
- An extensive distance of off-site sewers would be required to connect to the public sewerage system. Where no public sewerage facilities are available then the provisions of Circular 10/99 Planning Requirement in respect of the 'Use of Non-Mains Sewerage Incorporating Septic Tanks in New Development' apply and consultation with the Environment Agency is required. The provision of sewerage for the potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended).
- If a connection was made to the public sewerage network, the proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater

1640

1640 Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

C21 Glyn Rhonwy, Llanberis

- 1641 {
- Our local water network should be sufficient to provide the domestic water demands required to serve this development area.
 - The public sewerage network can accept the domestic foul flows arising from this development area. Glan Rhonwy Sewage Pumping Station is located in the area and may need assessment to ascertain its capacity dependant on the type of development proposed.
 - Llanberis Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C22 Former site of Ysbyty Bron y Garth, Penrhyndeudraeth

- 1642 {
- Our local water network is sufficient to provide the domestic water demands required to serve this development area.
 - The public sewerage network can accept the domestic foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.
 - Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C39 Griffin Industrial Estate, Penrhyndeudraeth

- Dyddi hun ddyn
ar y môr {
- Our local water network is sufficient to provide the domestic water demands required to serve this development area.
 - The public sewerage network can accept the domestic foul flows arising from this development area. The foul flows would lead to Penrhyndeudraeth Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed.
 - Penrhyndeudraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

C23 Penygroes Industrial Estate

- 1643 {
- Our local water network is sufficient to provide the domestic water demands required to serve this development area.
 - Potential developers need to be aware that the site is crossed by a number of sewers. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights to access its apparatus at all times. Protection measures in respect of these assets will be required either in the form of an easement width or a possible diversion of the asset.
 - Penygroes is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the domestic demands arising from this development area.

C24 Agricultural Park, Llanystumdwy

- 1644 {
- Our local water network is sufficient to provide the domestic water demands required to serve this development area.
 - There are no public sewers in close proximity to this site, as such the provisions of 'Circular 10/99 Planning Requirement in respect of the Use of Non-Mains Sewerage in New Development' apply and potential developers may wish to consider installing a private