

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **444**

Enw / Name: **Mon a Gwynedd Friends of the Earth (Mr Richard Mills)**

Rhan: **POLISI STRATEGOL PS18**

Section: **STRATEGIC POLICY PS18**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylai Polisi Strategol PS18, a'r polisiau cysylltiedig, gyfeirio at strategaethau lleihau gwastraff, gan adlewyrchu targedau yn y Rhaglen Atal Gwastraff Cymru. Fe ddylia'r CDLI ar y Cyd annog neu orfodi datblygwyr i osgoi gwastraff ac i ail-ddefnyddio ac ailgylchu gwastraff a gynhrychir yn ystod y cyfnod dymchwel a/ neu adeiladu.

Representation Summary:

Strategic Policy PS18, and the associated policies, should make reference to waste minimisation and reduction strategies, reflecting targets in The Waste Prevention Programme for Wales. The JLDP should encourage or compel developers to avoid waste, and to re-use and recycle waste generated during the demolition and/or construction phase.

Sylw Llawn / Full Representation:

It is claimed in the Deposit JLDP that, "The Plan has regard to, and is compatible with, the content of the Collections Infrastructure and Markets Sector Plan (CIMSP)." That may be the case, but in our opinion Strategic Policy PS18 on Waste Management is inadequate and unsound insofar as it fails to take account of other Welsh Government guidance.

In particular, there is no reference to waste minimisation and reduction strategies. For example, the Deposit JLDP appears to fail to encourage developers to avoid waste and to re-use and recycle waste generated during the demolition and/or construction phase. The Waste Prevention Programme for Wales has set a waste reduction target for commercial and industrial waste of 1.2% and 1.4% per annum, respectively, up until 2050. We consider that insufficient attention (in fact, no attention) has been paid to these targets in the Deposit JLDP. The Plan policies should encourage or compel developers to avoid waste, and to re-use and recycle waste generated during the demolition and/or construction phase. Failure to give due consideration to this aspect constitutes insufficient compliance with Welsh Government policy, and a failure in respect of consistency test C2.

It might be noted in this context that four building sites in Wales have been taking part in a pilot scheme to identify ways that construction and demolition projects can generate less waste, reuse materials and use more recycled content. The "Enabling Zero Waste" project, run by the Welsh government-sponsored Constructing Excellence in Wales (CEW), offers practical support to site managers looking to achieve zero waste. This drive to improving further the performance of construction and demolition projects with respect to waste is essential if Welsh Government targets are to be met. The JLDP should recognise this fact and incorporate appropriate policies.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

As outlined in the statements above.



11/3/15

10th March 2015

Joint Planning Unit
1st Floor
Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT

Our Ref: 421.03735.00001
Your Ref:

Dear Sir

**RE: ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN
2011 – 2026
REPRESENTATIONS MADE ON BEHALF OF TY MAWR WEST LTD**

Following the initial representations dated 19 June 2013 made on behalf of the above named Company, my Client wishes to submit further formal representations and comments in respect of the Deposit Local Development Plan 2011 – 2026 – Initial Consultation Report – Feb 2015.

The general comments regarding firstly infrastructure and timescale and secondly the implication of constraints particularly relating to SLA's in quarrying areas are matters of some concern to my Client.

Q2a timescale

We would wish to see the timing to be in accord with Welsh Government guidance.

Q3ch

The inclusion of both the Chartered Institute of Building and Home Builders Federation is supported.

Appendix 10

Q1

The summary refers to "quarrying is coming to an end". Such activity remains a significant and important business not only to Anglesey and Gwynedd but also the Region with the need to protect permitted resources and adjoining future extensions.

Q5

SP1 fails to include minerals which needs to be remedied regardless of the reference to SP18.

PS14 Concerning and Enhancing the Natural Environment

My Client wishes to repeat his strongly held views that to designate the Nantlle Valley as a Special Landscape Area would be detrimental to the local economy which factor should be borne in mind in the detailed consideration of the possible adverse effects of such designation.

PS18 Waste Management

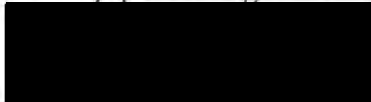
The waste hierarchy should include a provision for the appropriate use of suitable inert waste arising to be employed in the prudent restoration of previously disturbed land.

PS18 Minerals – Slate Waste

The summary relating to the rail connection at Bleanau Ffestiniog does not portray the total facts of the matter. Yes there is a passenger rail connection but the rail infrastructure itself is unsuitable for the passage of heavy goods wagons which remedial works would require major expenditure.

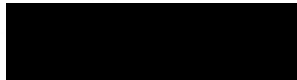

Should there be any points arising then please do not hesitate to contact the writer.

Yours sincerely
SLR Consulting Limited


John Hill
Principal
On behalf of Ty Mawr West Ltd

24th March 2015

Joint Planning Policy Unit
Bangor City Council Offices
Ffordd Gwynedd
Bangor
Gwynedd
LL57 1DT

Our Ref: 
Your Ref: 

Dear Sir / Madam

**RE: ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN
2011 – 2026
REPRESENTATIONS MADE ON BEHALF WELSH SLATE LTD**

Previously my client Welsh Slate Ltd has submitted on two separate occasions its views and representations being dated 19 June and 10 July 2013. My Client now wishes to submit further representations and comments in respect of the Deposit Local Development Plan 2011 – 2026 Initial Consultation Report Feb 2015.

It is noted and agreed that documents should refer to the Welsh Government rather than the Welsh Assembly Government.

The Initial Consultation Report at Part 1 as a general comment provides the details of the seven (7) public participation meetings where no adverse references are made as to the minerals industry in the UDP. In relation to the four (4) council members seminars the Initial Report contains only one (1) reference to minerals this being in respect of the uncertainty as to the objective stated.

Initial Report at Appendix 10 Question 1 refers to the previous statement "quarrying is coming to an end" where in response it is stated that resources will be protected and support provided for suitable extensions – an approach fully supported by Welsh Slate. The minerals industry remains a significant base element in the composition of the strategic structure not only of the UDP area but also its neighbours and the Region.

Strategic Policy 1 – whilst listing 13 objectives there is a total failure to include any reference to minerals which should be remedied regardless of any reference /s to Strategic Policy 18.

Strategic Policy 'PS4 Development in the Countryside' recognises that mineral extraction and waste management facilities are acceptable land uses in the countryside. Paragraph 7.57 of the Draft Consultation Response under 'Providing Opportunities for a Flourishing Economy' states that Gwynedd Council and its partners 'seek to focus on sectors and activities in which the area has competitive advantages, which will yield the greatest economic benefits and which will offer the greatest diversification potential'. It makes reference to 'the area's abundant natural resources' prior to listing specific sectors that provide opportunities for the area. However, it is noted that minerals are not identified within the list of sectors. As previously stated, the Company's activities make a significant

My Client wishes to make a representation in regard to the Summary Issue Raised concerning Bleanau Ffestiniog and its rail links. The situation is not as clear cut as stated, there being major rail infrastructure problems on the route between Bleanau the North Coast main line, a position my client is willing to discuss should you so wish.

Should there be any points or matters arising from these representations which it is felt would benefit from discussion then please do not hesitate to contact the writer.

Yours sincerely

SLR Consulting Limited



John Hill
Principal

For and on behalf of Welsh Slate Limited.