



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

Ein cyf/Our ref: CAS-20413-W7C0
Eich cyf/Your ref: Hearing Session 12

Llwyn Brain,
Ffordd Penlan,
Parc Menai,
Bangor,
Gwynedd.
LL57 4DE

Ebost/Email:
angharad.crump@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 655 232

Sharon Ellis,
Programme Officer,
Anglesey and Gwynedd Joint Local
Development Plan,
Swyddfa'r Cyngor,
Stryd y Jel,
Caernarfon,
Gwynedd.
LL55 1Sh

04/08/2016

Dear Miss Ellis,

Representation by Natural Resources Wales ID No. 1521
Rep No. 1082 Map 8 – Adwy'r Hafan, Pwllheli
Hearing Session 12
Allocations and Alternative Sites
Gwynedd – Llyn

NRW wish to provide the following additional representation for Hearing Session 12 of the Gwynedd and Ynys Mon Joint Local Development Plan – Allocations and Alternative Sites Gwynedd – Llyn.

- a. Allocation ref C6 - Adwy'r Hafan, Pwllheli -
- b. The site is currently mostly developed with some area of vacant undeveloped land.

The site is allocated under the provisions of Policy CYF1 that safeguards and allocates land and units for employment/business enterprise uses (B1/B8 uses).

- c. Policy CYF1 identifies that the total area of land that forms proposed allocation C6 is 10.5ha with 1.5ha² being vacant. Policy CYF1 does not define the scale/number of units that are proposed but includes provision for both change of use applications, demolition and re-build of existing units and erection of new units.
- d. As previously identified in our representations (reference 1082), proposed allocation C6 is located within flood zone C1 of the Welsh Government's TAN15: Development Advice Maps (DAM). Further developing this land for employment use would contradict national planning policy guidance contained within TAN15. There may be a risk of flooding due to a

breach of the defences (sand dunes) along the eastern boundary of the site and the potential for flood water to enter the site from over the quay wall to the west of the site.

We also previously advised that the flood risk associated with this site has not been adequately assessed and recommended that either a stage 2 or stage 3 SFCA was prepared. We understand that a stage 2 or stage 3 SFCA has not been prepared for this site.

Changes of use within the same vulnerability category and which wouldn't result in an intensification of use could be acceptable, however we would oppose any new developments (of any vulnerability) within the site.

We are aware that part of the proposed allocation (land at Cae Ceffyl) has recently been granted planning permission for the development of a hotel (application reference C14/0709/45/LL). NRW does not consider that the existence of a valid planning permission for the Cae Ceffyl site can be taken in lieu of an SFCA (stage 2 or 3) for the whole allocation.

- e. We are not aware of the anticipated timescales for delivery and object to the allocation of site C6 as it contradicts national planning policy guidance contained within TAN15.
- f. For the reasons set out above we object to the allocation of site C6.
- g. It is considered that including allocation C6 makes the plan unsound as it is not consistent with national planning policy relating to Flood Risk.
- h. We are not aware of any alternative sites considered.
- i. We do not consider that this site should be allocated within the Plan and therefore for the reasons set out above do not consider that the Authority's site selection process has been reasonable and appropriate, based on robust and credible evidence base in respect of site C6.
- j. We are not aware of any alternative allocation.

We trust that our comments are of assistance to you. Please do not hesitate to contact us if we can be of any further assistance to you. We can expand further on any of the matters raised above during hearing session 12 should this be of assistance to the Inspector.

Yn gywir / yours faithfully

Angharad Wyn Crump MRTPI
Uwch Swyddog Cadwraeth / Senior Casework Officer
Tim Gwaith Achos / Casework Team