



CYNGOR SIR  
YNYS MÔN  
ISLE OF ANGLESEY  
COUNTY COUNCIL



# Observations about Focus Changes representations

Anglesey and Gwynedd Joint Local Development  
2011—2026

June 2016

## OBSERVATIONS ABOUT REPRESENTATIONS SUBMITTED REGARDING FOCUS CHANGES

### Introduction

1. From 25th February to 13th April 2016, Gwynedd Council and the Isle of Anglesey County Council formally consulted on a Schedule of Focussed Changes (see document CDLL.023 <https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Supporting-documents/CDLL.023-Schedule-of-Focussed-Changes---Final.pdf> ). During the consultation, the Councils received a total of 130 representations from 24 different individuals or organisations.

### Representations to the Schedule of Focussed Changes - An Overview

2. The table below provides an overview of the number of representations broken down by Sections in the Plan.

Chapter	Total representations	Object	Support	Comment
1	1	0	1	0
3	2	1	1	0
5	5	3	2	0
6	3	1	1	1
7.1	18	10	5	3
7.2	23	11	3	9
7.3	16	5	2	9
7.4	36	14	14	8
Inset Maps	22	17	2	3
Proposals Maps	4	1	1	2
<b>Total</b>	<b>130</b>	<b>63 (48%)</b>	<b>32 (25%)</b>	<b>35 (27%)</b>

### Observations about the representations submitted about the Focussed Changes

3. The next table provides a summary of each individual representation and presents observations in respect of the representations received, highlighting those instances where it is considered that it may be possible for further changes to be made [i.e. through Matters Arising Changes] during the Examination period, if deemed necessary / appropriate by the Inspector.

4. Potential amendments to text are shown in the table as follows:

Example of new text

~~Example of deleted text~~

#### **Proposed changes and the Sustainability Assessment (SA) and Habitat Regulations Assessment (HRA) of the Plan**

5. Any proposed changes suggested in the table have been screened to determine if they are of significance with regard to the findings of the SA and HRA. SA and HRA Addendum Reports will be produced to set out the method and findings of this screening work and these will be published in July 2016. At this stage, an initial screening has concluded that the proposed changes are minor and do not significantly affect the findings of the previous SA or HRA work.

#### **Public consultation about proposed changes**

6. If the Inspector agrees that the proposed changes merit inclusion in the Plan as Matters Arising Change, the Councils will consult about them, reporting the results of the consultation to the Inspector.

Summary of Representations received on the Focus Changes and observations about them

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
NF1	093	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF1.	Note the supporting comment
NF2	028	Comment	National Resources Wales (Angharad Crump) [1521]	With regards to Focus Change NF2 we note the clarification with regards to the Development Consent Order process and the fact that associated developments will be consented under the Town and Country Planning Act 1990.	Note the comment
NF2	094	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>It is considered that the Plan would benefit from further clarification to explain the likely impact of the Wales Bill on how “associated development” can be consented within Wales, given that the Wales Bill will likely achieve royal assent soon after the adoption of the Plan. This clarification is required to make the Plan sufficiently flexible. Substitute the previously proposed wording for revised paragraph 3.8 with the following new wording:</p> <p><b><i>“3.8 Currently the Planning Act 2008 regime in Wales cannot, except in very limited circumstances, consent development that is classed as “associated development” through a Development Consent Order (DCO). Instead in Wales such associated development is currently consented under the Town and Country Planning Act 1990 by the local planning authority. However, the draft Wales Bill, as currently drafted, includes provisions which will change the Planning Act 2008 regime such that “associated development” for large electricity generation NSIPs in Wales can be consented through DCOs. The policies set out in this Plan with regard to the Wylfa Newydd Project are therefore</i></b></p>	<p><b>Not accepted</b> The suggested change is adding to the changes suggested by the original objector. It is not believed that the inclusion of a reference to the draft Wales Bill adds anything to the introduction to the policies. It is also believed that the description of Temporary Accommodation for Construction Workers is too limited. It does not reflect the alternatives that are possible, which are addressed in the Plan's policies and the current SPG for the Wylfa Newydd project.</p> <p><b>Recommendation</b> That the Inspector includes NF 2 without any change.</p>

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				<p><i>relevant to the Local Authority's response to applications (where they are a consultee), or in the determination of applications, where they are the consenting authority.</i></p> <p><i>Although not strictly associated development in terms of how it is defined under the Planning Act 2008 this Plan uses the term for such development which supports the Nationally Significant Infrastructure Project. Associated developments for the Wylfa Newydd Project may include:</i></p> <ul style="list-style-type: none"> <li><i>§ Route improvements along the A5025;</i></li> <li><i>§ Transport and freight logistics;</i></li> <li><i>§ Temporary Construction Worker Accommodation (TCWA)</i></li> </ul> <p><i>"Temporary Construction Worker Accommodation (TCWA) describes the sites outside the Wylfa Newydd Development Area on which temporary construction workers required for the construction of the Wylfa Newydd Project will be accommodated. These will generally be, but not limited to, campus style developments comprised of modular single bedroom units and associated shared facilities such as catering, healthcare and laundry services."</i></p>	
NF4	095	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF4.	Note the supporting comment
NF5	096	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF5.	Note the supporting comment
NF6	097	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF6.	Note the supporting comment

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NF8	065	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	Bourne Leisure objects to this change, as it does not recognise that, in some cases, development that might affect features of international and national nature conservation sites may be acceptable, subject to the provision of appropriate mitigation measures. The Company notes that specific developments also have the potential to generate net gain in biodiversity value through habitat creation. Bourne Leisure therefore requests that the Policy is amended as follows: <i>“no development given planning permission will have resulted in a loss of a site of international or national nature conservation value <del>or damage to any of their features</del>” (Focused Change in bold, suggested amendments in bold and underlined).</i>	<b>Not accepted</b> The objections (nos. 065 and 098) refer to the focussed change to one of the objectives of the Plan. The change was included to reinforce the aim of the Plan to ensure that statutory designated sites are protected from damage and deterioration, in accordance with the objectives of the designation, and their important features maintained by proper management. Although a national or international designation does not necessarily prohibit development, the wording of the output on the focussed change is in accordance with legislation and conveys a presumption against development that is likely to cause harm. Development proposals will be assessed against the policy requirements of the Plan and PPW as well as relevant legislation. It is not necessary or appropriate for the objectives or all policies to state that exemptions may be allowed after considering the individual proposal and the Plan as a whole.
NF8	098	Object	Horizon Nuclear Power (Daniel Harper) [2919]	Horizon does not consider that the amendments made by Focused Change Ref: NF 8 address its previous concerns and therefore suggest that the wording of Theme 5 be altered as advocated in its previous representations.  Third bullet point to be amended to read:  <i>“Except in exceptional circumstances, no development given planning permission will have resulted in a loss of a site of international or national nature conservation value or damage to any of their features.”</i>  This change is required in order to meet the soundness test “will the plan deliver”. In its current wording it is not effective nor sufficiently flexible to meet changes in circumstances.	<b>Recommendation</b> That the Planning Inspector includes NF 8 without any change.
NF10	099	Comment	Horizon Nuclear Power (Daniel	Horizon recognises the importance of preserving the Welsh language and a Welsh Language Impact	Note the comment

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			Harper) [2919]	Assessment will be provided in support of the Wylfa Newydd project DCO and a WLIA or Welsh Language Statement will be provided for associated TCPA applications as necessary.	
NF11	100	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF11.	Note the supporting comment
NF13	044	Object	Welsh Government (Mark Newey) [1561]	<p>The proposed focussed change includes a reference to the household to dwelling conversion vacancy rate. However, it is not clear from the Councils own evidence what the vacancy rate is. For example, the Edge Analytics papers states that vacancy rates for Gwynedd &amp; Anglesey are 12.2% and 10.5% respectively. However, the conversion rates utilised in the DC.017/DC.018 are 16.5% and 11.9%? <b>It would aid the clarity of the plan if the vacancy rate was stated in the plan, including an explanation as to why the rate is appropriate for local circumstances.</b></p>	<p><b>Accepted</b></p> <p>Agree that the inclusion of a reference to specific vacancy rates would improve the clarity of the Plan. The rate that was used was that specified in the work of Edge Analytics to identify the demand for housing units. In order to formulate the different forecasts for the Plan area the consultant modelled the relationship between households and housing by using information from the 2011 Census (tables KS401 and QS418). In the case of the Gwynedd Planning Authority area, those areas of Gwynedd within the National Park area were excluded. The figures for the whole of Gwynedd are included in the Topic and Background Papers. It is believed that the inclusion of a description of the methodology used to identify the figure for Gwynedd planning area in the Glossary of Terms would be beneficial.</p> <p>This is the wording that it is suggested should be included in the Plan:</p> <p>6.40 The basic housing requirement (the target )for the Plan area, i.e. 7,184 <b>which takes into account the vacancy rate (12.2% in Gwynedd Planning Authority area and 10.5% in Anglesey Planning Authority area),</b> is based on</p>

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					<p>assessment of all the evidence and is directly related to the Plan area's growth prospects and the Councils' aspirations. It is considered that linking housing requirements to wider economic prospects improves the robustness and deliverability of the Plan's Strategy. It is anticipated that it will contribute to providing an opportunity and scope to live and work in the Plan area. The level of growth reflects the impacts of the recession as well as the transformational economic prospects expected later on during the Plan period. The Plan will facilitate the development required to complement each Council's strategic plans and programmes. This should mean that the area will start to become a more age-balanced area, more independent and less reliant on outside sources of labour, with scope for reducing levels of out commuting and be on its way to becoming a sustainable and more self-contained set of communities.</p> <p><u>Add the following to the Glossary of Terms in the Plan</u></p> <p><u><b>Vacancies rates</b></u></p> <p><u><b>The relationship between households and dwellings are modelled using 'vacancy rates', which come from the 2011 Census. The rate of vacancies includes second homes and holiday homes. The vacancy rate is calculated by dividing the number of places in occupied households (table KS401) with the total number of houses (QS418). In the case of part of the</b></u></p>

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					<p><u>Plan area that is within the Gwynedd Planning Authority, it was necessary to exclude parts of Gwynedd county that are, inside the Snowdonia National Park. The total statistics for the Census Output Areas that are not within the SNP were used.</u></p> <p><u>Empty spaces in households and households that are used as second homes are described in the Census as 'places in households without regular residents'. Because there are many holiday homes and second homes in Anglesey and Gwynedd, the vacancy rates are higher than places that have fewer households of this type.</u></p> <p><b>Recommendation</b> It is believed that the changes noted above for NF 13 are appropriate and if the Inspector agrees the issue can be treated as a Matter Arising during the Examination.</p> <p>It is believed that the changes noted above for the Glossary of Terms are appropriate and if the Inspector agrees the issue can be treated as a Matter Arising Changes during the Examination.</p>
NF14	066	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	Bourne Leisure agrees with the Councils that the strength of local economies is of key importance in this regard, as it helps provide opportunities for people to remain within the area rather than having to move to find work elsewhere. However, the Company considers that Welsh should be treated as <u>one</u> of the official languages in Wales,	<p><b>Accepted</b> The comment is relevant to the English version of paragraph 7.1.3 and it is agreed that the wording is misleading. To be consistent with the Welsh version, it is agreed that it is appropriate to change the wording in the English version as follows:</p>

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				<p>rather than <i>the</i> official language. Therefore, Bourne Leisure requests that the Policy is amended as follows:  <i>“Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as <u>one of the official languages in Wales</u>”</i>            (Suggested amendments underlined).</p>	<p>7.1.3 Where development is proposed, consideration must be given to the enhancement and protection of the language and culture. <u>Key to this is sustaining existing communities. The Plan, along with national planning policy and guidance, offers a number of policy approaches that although not directly referring to the Welsh language, along with other partner initiatives, will have a positive impact. The strategy recognises that a large proportion of the existing population live in rural settlements and therefore supports rural as well as urban communities. Probably of most importance to sustaining local communities and strengthening the language is the need to promote healthy local economies. This approach provides opportunities for people to remain within the Plan area rather than seeking jobs elsewhere. The Plan includes a series of Policy that will facilitate this objective, encouraging economic opportunities close to where people live which will have a positive effect on the vibrancy of the community and the Welsh language. Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as <del>an the</del> official language in Wales. There should be a commitment to treat Welsh and English on an equal basis. Policies will help ensure that the right level and type of need is met and that the rate at which the</u></p>

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					<p><u>development comes forward allows the development to be absorbed without damaging the character of the community. Additionally policies will aim to retain existing community facilities and facilitate replacement facilities or new facilities, as appropriate.</u></p> <p><b>Recommendation</b> That the Inspector includes a Welsh version of NF 14 without any change, but that it is appropriate to amend the English version according to the above. If the Inspector agrees the issue can be treated as a Matter Arising Change during the Examination.</p>
NF14	101	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Focused Change Ref: NF 14 has amended paragraph 7.1.3 and introduced the following sentence, "...Policies will help ensure that the right level and type of need is met and that the rate at which the development comes forward allows the development to be absorbed without damaging the character of the community..."</p> <p>However, it is considered that provision should be made for appropriate mitigation measures to remedy any "damage" which might be caused to the character of the community.</p> <p>Horizon is committed to the equal treatment of the Welsh and English languages and a Welsh Language Impact Assessment will be provided in support of the Wylfa Newydd project DCO and a WLIA or Welsh Language Statement will be provided for associated TCPA applications, as necessary.</p>	<p><b>Accepted in part</b></p> <p>It is believed that it is appropriate to refer to the aim to promote development that will not lead to damage. It is not necessary or appropriate for every statement and policy in the plan to state it could mitigate the impact of development to make it satisfactory. Issues are looked at on a case by case basis, and cases could be a trigger for a planning condition or planning obligation to ensure mitigation measures and/or measures to promote positive effects. This arrangement has already been included in the Plan. Nevertheless, it is believed that referring to mitigation measures would improve the clarity of the Plan and ensure internal consistency of the Plan, and that the best way to do that is to add a reference to the SPG. The change is shown in NF14 below.</p> <p>7.1.3 Where development is proposed,</p>

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					<p>consideration must be given to the enhancement and protection of the language and culture. <u>Key to this is sustaining existing communities. The Plan, along with national planning policy and guidance, offers a number of policy approaches that although not directly referring to the Welsh language, along with other partner initiatives, will have a positive impact. The strategy recognises that a large proportion of the existing population live in rural settlements and therefore supports rural as well as urban communities.</u></p> <p><u>Probably of most importance to sustaining local communities and strengthening the language is the need to promote healthy local economies. This approach provides opportunities for people to remain within the Plan area rather than seeking jobs elsewhere. The Plan includes a series of Policy that will facilitate this objective, encouraging economic opportunities close to where people live which will have a positive effect on the vibrancy of the community and the Welsh language. Additionally, it is expected that any retail, industrial or commercial development demonstrates an understanding of the linguistic composition of the area where the planning application relates and recognition of the status of Welsh as <del>an</del> the official language in Wales. There should be a commitment to treat Welsh and English on an equal basis. Policies will help ensure that the right level and type of need is met and that the rate at which the development comes forward allows the</u></p>

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					<b><u>development to be absorbed without damaging the character of the community. Additionally policies will aim to retain existing community facilities and facilitate replacement facilities or new facilities, as appropriate. SPGs will reinforce policies by providing guidance on the type of information or assessment that will be required at planning application stage to illuminate an assessment of the impact, any potential damage, and the potential need for mitigation and/or measures to promote positive effects.</u></b>
NF15	058	Objection	Welsh Government (Mark Newey) [1561]	<b>Criteria a) and b) should be reworded to ensure that they are TAN20 compliant.</b> The criteria should not apply to windfalls that have been assessed as part of the plan, including SEA/SA and are within <b>defined settlements boundaries. The current wording, as written, would apply to all windfalls. Furthermore, the wording should relate to dwellings,</b> not people, 'significant' should be defined, 'attract' should be deleted.	<u>Comment 058</u> <b>Accepted</b> It is agreed that the criteria referred to could be interpreted as being applicable to all windfall sites. The intent of this section of Policy PS1 is to provide the framework to get the relevant information concerning when the proposal involves proposed land use and the scale of development that is not consistent with what is being supported in the Plan, i.e. a significant deviation to the Plan. This can include the development which would include a large number of housing units on windfalls outside development boundaries, or the development of a site that is not recognised in the Plan for employment use (in its broadest sense) for employers who can offer employment opportunities that will require a significant flow of labour.
NF15	067	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	<b>Bourne Leisure</b> considers that it will not always be appropriate for companies to provide signage in both Welsh and English. It is also unclear from the policy which signage would be classed as "operational". The Company considers that in naming developments and street names, in some cases English names with local or cultural significance may be equally or more appropriate. In addition to defining "operational signage" Bourne Leisure requests that the Focused Change is amended as follows: <b><u>"5. Requiring Encouraging all operational signage</u></b>	It is believed therefore that there is a basis for changing Policy PS1 to respond to comment 058

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				<p>by public bodies and by commercial and business companies to be bilingual;</p> <p><b>6. Encouraging the use <del>Expect that</del> of Welsh place names <del>are used</del> for new developments, house and street names.” (Focused Changes in bold, suggested amendments in bold and underlined)</b></p>	<p>in accordance to that seen below.</p> <p><u>Comment 067</u>  <b>Accepted in part</b>            Having signs in Welsh and English is an indication of the character of the area, including its linguistic character. Signs are clues or prompts for someone to comprehend where s/he is in the world. Without a bilingual signs, there is a risk of promoting a greater use of English. It is important that the land use planning system, where appropriate, promotes bilingual signs, particularly from the private sector. It is believed that the proposed change to criteria 5 and 6 would weaken Policy and therefore undermine one of the main objectives of the Plan.</p>
NF15	102	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Horizon still considers that in the absence of the SPG it is still unclear how this policy test will be applied. Strategic Policy is still considered to pose a potential barrier to economic growth and other aspirations in the Plan. It is proposed to delete criteria (c) – it is not clear who makes an assessment that any proposal(s) provides an “adequate range of sizes and types of housing units”. Part (b) continues to apply to any residential development that goes beyond what has been assessed as part of JLDP preparation.</p> <p>Horizon also considers that Part 2 of proposed Policy PS1 is not specific enough and suggests thresholds are introduced for windfall sites. It is also suggested that this requirements should relate to windfall sites within areas identified by the LPA as areas where the language is considered to be of particularly sensitivity or significance and where they relate to major development.</p> <p>It is considered that this paragraph must be amended in accordance with the previously proposed wording in order to build in further flexibility and meet the soundness test “will the plan deliver”, as the plan needs to be sufficiently flexible to be effective.</p> <p>Horizon suggests amended wording.</p>	<p>It is believed that there are grounds to include guidance on what is meant by 'active signs'. Thus, the policy clarification should be amended to do this. See the change below.</p> <p><u>Comment 102</u>  <b>Accepted in part</b>            The protection and promotion of the Welsh language and culture is a key objective of the Plan. It is believed that the admission of the suggested changes would weaken the policy significantly, resulting in the reduced ability of the plan to address the key objective for the welfare of the language. Referring to sub-areas would reduce the eligibility of Policy spatially. Getting rid of criterion 4 would undermine the whole objective of the Policy. The suggested wording for criterion 5 would not reflect the</p>
NF16	059	Object	Welsh Government	Refers to 'rate' of development. Where is this	

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			(Mark Newey) [1561]	specified? Presumably by site and/or overall, linked to a trajectory? What 'information' is being sought through a WLIA?	<p>Councils' policies. The addition is not required because the demand for mitigation measures would emerge on a case by case basis. It is not necessary for each policy in the Plan to state that mitigation measures might be necessary.</p> <p>It is agreed that the wording of criterion 1(c) is not detailed enough. To overcome this, it is believed to that the criterion and explanation to the policy should be amended with reference to SPG - Type and mix of housing. See the change below.</p> <p>Comment 059 <b>Accepted</b> It is agreed that the inclusion of information that respond to the issues raised in the comment 059 would improve the clarity of the policy and its explanation.</p> <p>These are the changes to Policy PS1 and its explanation:</p> <p><b>STRATEGIC POLICY PS1: Welsh Language and Culture</b></p> <p><b>The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by:</b></p> <ol style="list-style-type: none"> <li><b><u>Requiring a Welsh Language Statement, which will protect, promote and enhance the welsh language, where the proposed development falls within one of the</u></b></li> </ol>

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					<p><b><u>following categories:</u></b></p> <ul style="list-style-type: none"> <li><b><u>a. Retail, industrial or commercial development employing more than 50 employees and/or with an area of 1,000 sq m. or more; or</u></b></li> <li><b><u>b. Residential development which will individually or cumulatively provide more than the indicative housing target set out for the settlement in Polies TAI 14 – 18; or</u></b></li> <li><b><u>c. Residential development of 5 or more housing units on allocated or windfall sites <del>inside development boundaries that doesn't address evidence of need and demand for houses recorded in Housing Market Assessments and other relevant local sources of evidence propose to provide an adequate range of sizes and types of housing units;</del></u></b></li> </ul> <p><b><u>2. Requiring a Welsh Language Impact Assessment, which wil set out how the proposed development will protect, promote and enhance the Welsh Language, where the proposed development involves a windfall site <del>outside development boundaries for the development of large-scale housing development or developing employment on a large scale which would mean a significant flow of workforce; and</del></u></b></p>

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					<p><del>a. Going to attract or accommodate many more people than originally envisaged in the policies and proposals of the Plan;</del></p> <p>3. Using appropriate mechanisms to ensure that suitable measures that mitigate negative impacts are provided or contribution is made towards them <b>mitigating those impacts;</b></p> <p>4. Refusing proposals that due to its size, scale or its location, would cause significant harm to the character and language balance of a community;</p> <p>5. <del>Encouraging</del> <b>Requiring all operational</b> signage by public bodies and by commercial and business companies to be bilingual;</p> <p>6. Encouraging the use- <b>Expect that of</b> Welsh place names <b>are used</b> for new developments, house and street names.</p> <p><b>Explanation:</b></p> <p><b>7.1.4 It is intended that all of the measures outlined in the paragraphs that precede this Policy will support communities and the Welsh language. The key objectives of the Plan demonstrate a commitment to promote balanced, sustainable and distinctive communities. This means that the Plan includes policy tools to allow local communities to change and grow sustainably and to address</b></p>

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					<p><u>the needs of all members of communities. There are a number of strategic and detailed policies that will give an explanation on how development proposals will be managed. On the whole the Sustainability Assessment (which was informed by the Language Impact Assessment) looks positively on policies and proposals of the plan on the grounds that development takes place at the appropriate scale and in the appropriate places, including measures to promote positive effects and mitigate adverse effects.</u></p> <p><u>7.1.4A Nonetheless, As can be seen in criteria 1 and 2 in Policy PS1, in order to make an informed judgment at a planning application stage information will be sought in relation to applications where development, if permitted, would come forward at a rate or scale different to that envisaged at the Plan preparation stage as set out in criteria 1 and 2. Policy PS1 reinforces other relevant policies in the Plan, which provide details on the assumptions made, e.g. the level of housing growth per settlement (TAI 14 - TAI 18); that housing development will provide an appropriate choice of market housing and affordable housing (TAI 1). Pre-application advice should be sought from the LPA as to whether a Statement or an Assessment should be provided. Having signs in Welsh and English, and Welsh place and property names are a clear indication of the character of the area, including its linguistic character.</u> The Welsh language will be promoted through different policies within the Plan. The</p>

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					<p>range of opportunities provided by the strategic and detailed policies, including a variety of different dwelling types, local employment growth and protecting and enhancing the cultural heritage will contribute towards improving the vitality of the Welsh language. . <u><a href="#">A Maintaining and creating distinctive and sustainable communities</a></u> Supplementary Planning Guidance (SPG) will be published <u><a href="#">and a Type And Mix Of Housing SPG</a></u> to provide further guidance on the matter. <u><a href="#">They will explain the type and location of development that is likely to be acceptable in the Plan area, explaining the relevant planning considerations. The Creating and Maintaining Distinctive and Sustainable Communities SPG will describe signs that are expected to be bilingual, e.g. public information signs, advertisements, display advertisements. The Statement or report on the Assessment allows the developer to explain his proposal in more detail and to consider the possible positive and negative effects on the community and its linguistic balance. The SPGs will look, for example, for evidence that the proposal has been discussed with Community, City and Town Councils and local community groups to obtain information and ask for their opinion, and that consideration has been given to surveys about the local housing market, and/ or the labour market . In addition, they will refer the applicant to such assistance as is available from the Office of Language Commissioner about designing bilingual signage and marketing material, the advice that is available to the private sector by the Welsh Government/</a></u></p>

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					<p><u><a href="#">Business Wales regarding bilingualism.</a></u></p> <p><b>Recommendation</b> It is believed that the changes noted above to NF 15 and NF 16 are appropriate and if the Inspector agrees the changes can be treated as Matters Arising</p>
NF17	029	Comment	National Resources Wales (Angharad Crump) [1521])	We note the inclusion of further detail regarding the new planning charge that came into force on the 6th April 2010 through the Community Infrastructure Levy Regulations 2010.	Note the comment
NF17	042	Object	Welsh Government (Mark Newey) [1561]	<p><u>Policy PS2: Infrastructure and Developer Contributions</u></p> <p>The WG welcomes the clarity on the S106 and CIL process in NF17 and NF18, but maintains its concern on the delivery and viability of plan allocations. Whilst Topic Paper 13 Community Infrastructure provides a useful context on infrastructure requirements, <b>there is a lack of evidence on site-by-site infrastructure requirements, costings, funding mechanisms, delivery bodies and timescales for implementation.</b> The Councils should explain in the absence of this evidence, how allocated sites will be delivered and how this will not adversely impact on viability and the phasing of housing sites.</p> <p>To secure the necessary infrastructure, the Council should be certain that without a CIL charge in place and an inability to 'pool' future S106 agreements (beyond 5 per specific infrastructure item), the delivery of sites and key infrastructure will not be inhibited.</p>	<p><b>Accepted in Part</b> Note the positive comments regarding the clarity provided by NF17 and NF18.</p> <p>As set out in the schedule of work provided in response to the Inspector's request for information (DA.00?) in relation to site-by-site infrastructure requirements the Council is in the process of preparing an Infrastructure and Delivery Topic Paper (Topic Paper 22) outlining the information received from statutory consultees in relation to individual sites consultation undertaken by the Council. The Council's response sets out the timetable to complete Topic Paper 22 (DA.003A &amp; B)</p> <p><b>Recommendation</b> The Inspector includes NF17 without any amendment.</p> <p>In response to the issue regarding detailed information about the deliverability of individual</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					sites the Council intends to provide clarity through producing Topic Paper 22 Infrastructure and Delivery which collates the comments received from statutory consultees in relation to specific sites. This would draw together information that is currently provided in PT.002 Topic paper 1A Candidate Site Assessment (2015), PT.003 Topic Paper 1B Candidate Site Assessment (2016) and PT.032 Topic Paper 19 Settlement Profiles (2016) into a single document.
NF17	103	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF17.	Note the supporting comment
NF18	061	Support	Welsh Government (Mark Newey) [1561]	Support. Adds clarity to the plan in terms of how infrastructure requirements will be prioritised and the role of S106 and CIL.	Note the supporting comment
NF18	104	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF18.	Note the supporting comment
NF20	033	Support	Welsh Highland Railway (Graham Farr) [254]	Meets representation ID439.	Note the supporting comment
NF20	060	Object	Welsh Government (Mark Newey) [1561]	Delete 'Topic Paper 13 on Community Infrastructure differentiates between essential and preferred infrastructure.' The tests for s106 are set out in legislation and reflected in paragraph 7.1.9a (NF17) which describes them necessary, directly related and fair/reasonable. <b>It is unclear as to how essential and preferred infrastructure aligns with the tests.</b>	<b>Accepted</b> Agree that the term 'Preferred Infrastructure' could be challenged as not satisfying the tests for S106 agreements.  The reference to 'preferred infrastructure' within Topic Paper 13 should be amended to 'Community Infrastructure' to reflect the type of infrastructure identified under this category in Table 3.1.

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>In light of this recommend that the reference to ‘essential and preferred infrastructure’ in NF 20 be amended to ‘fundamental, necessary and community infrastructure’ to reflect the recommended changes within Topic Paper 13 highlighted above.</p> <p><b>Recommendation:</b> The additional changes highlighted below for NF20 are considered to be appropriate, and if the Inspector agrees can be treated as Matters Arising Change during the examination. In addition the following parts of Topic Paper 13 are also amended to ensure consistency between the evidence base and the Plan.</p> <p><u>Part of NF20 to be amended as follows:</u></p> <p><b><u>Topic Paper 13 on Community Infrastructure differentiates between fundamental, necessary and community essential and preferred infrastructure.</u></b></p> <p><u>Topic Paper 13 to be amended as follows:</u></p> <p>1] Paragraph 3.2 last bullet point:</p> <p><u>Preferred Community</u> – the delivery of <u>community</u> infrastructure <del>in this category is preferred that is essential</del> in order to create <u>/maintain</u> sustainable communities e.g. libraries, green spaces. Timing and phasing <u>may not always be required prior to commencement of development is not essential</u> over the plan period.</p>

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					2] Table 3.1 Hierarchy of Infrastructure:																																																												
				<table border="1"> <thead> <tr> <th>Infrastructure Topic</th> <th>Infrastructure Sub-Topic</th> <th>Position in Hierarchy</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Education</td> <td>Primary Schools</td> <td>Necessary</td> </tr> <tr> <td>Secondary Schools</td> <td>Necessary</td> </tr> <tr> <td rowspan="3">Health</td> <td>Hospitals</td> <td>Necessary</td> </tr> <tr> <td>GPs</td> <td>Necessary</td> </tr> <tr> <td>Dentists</td> <td>Necessary</td> </tr> <tr> <td rowspan="4">Utilities</td> <td>Electricity</td> <td>Fundamental</td> </tr> <tr> <td>Renewable Energy</td> <td>Necessary</td> </tr> <tr> <td>Gas</td> <td>Fundamental</td> </tr> <tr> <td>Potable Water</td> <td>Fundamental</td> </tr> <tr> <td rowspan="2">Waste</td> <td>Waste</td> <td>Fundamental</td> </tr> <tr> <td>Recycling</td> <td>Fundamental</td> </tr> <tr> <td rowspan="2">Water and Wastewater</td> <td>Sewerage</td> <td>Fundamental</td> </tr> <tr> <td>Wastewater treatment</td> <td>Fundamental</td> </tr> <tr> <td rowspan="2">Transport</td> <td>Road</td> <td>Fundamental</td> </tr> <tr> <td>Public Transport</td> <td>Fundamental</td> </tr> <tr> <td rowspan="3">Community Infrastructure</td> <td>Libraries</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Community Centre</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Built Sports Facilities</td> <td><u>Preferred Community</u></td> </tr> <tr> <td rowspan="3">Green Infrastructure</td> <td>Playing Fields / Outdoor Sports</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Open spaces / Parks</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Allotments</td> <td><u>Preferred Community</u></td> </tr> <tr> <td rowspan="3">Emergency Services</td> <td>Police</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Fire service</td> <td><u>Preferred Community</u></td> </tr> <tr> <td>Ambulance</td> <td><u>Preferred Community</u></td> </tr> </tbody> </table>	Infrastructure Topic	Infrastructure Sub-Topic	Position in Hierarchy	Education	Primary Schools	Necessary	Secondary Schools	Necessary	Health	Hospitals	Necessary	GPs	Necessary	Dentists	Necessary	Utilities	Electricity	Fundamental	Renewable Energy	Necessary	Gas	Fundamental	Potable Water	Fundamental	Waste	Waste	Fundamental	Recycling	Fundamental	Water and Wastewater	Sewerage	Fundamental	Wastewater treatment	Fundamental	Transport	Road	Fundamental	Public Transport	Fundamental	Community Infrastructure	Libraries	<u>Preferred Community</u>	Community Centre	<u>Preferred Community</u>	Built Sports Facilities	<u>Preferred Community</u>	Green Infrastructure	Playing Fields / Outdoor Sports	<u>Preferred Community</u>	Open spaces / Parks	<u>Preferred Community</u>	Allotments	<u>Preferred Community</u>	Emergency Services	Police	<u>Preferred Community</u>	Fire service	<u>Preferred Community</u>	Ambulance	<u>Preferred Community</u>	
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NF20	105	Support	Horizon Nuclear Power (Daniel	Original objection has been addressed through NF20.	Note the supporting comment																																																												

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			Harper) [2919]		
NF23	017	Comment	CPRW Gwynedd (Noel Davey) [1161]	We welcome the revised wording of PS4, giving a clearer and more explicit commitment to safeguarding and promoting the RoW in the context of the strategic policy. We still regret the absence of an individual policy comparable to CH22 in the GUDP which lays out the aims for the RoW and cycle networks in more detail. TRA4, focussing mainly on new developments, does not meet that requirement adequately.	Note the comment
NF23	106	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF23.	Note the supporting comment
NF24	125	Object	Horizon Nuclear Power (Daniel Harper) [2919]	Horizon does not support the amendments to 4(iii) made by Focused Change Ref: 24 which remove any specific reference to the improvements of the stretches of highway between A5025 Valley to Wylfa Newydd /Amlwch to Wylfa Newydd. <b>It is suggested that 4(iii) should be amended as per the wording previously proposed by Horizon, provided in the cell to the left.</b>	<p><b>Not Accepted</b></p> <p>a). It is not accepted that the Use Threshold Table should be included in 3(i) nor it is felt that the table requires further clarification.</p> <p>The amended wording allows flexibility to determine the need according to local circumstances.</p> <p>What is large-scale in rural areas may be considerably different to large-scale in urban areas and setting one inflexible threshold reduces the ability to flex the requirement to the particular case.</p> <p>b). It is not accepted that the following point should be re-introduced into Policy TRA 1 as no full planning application has yet to be submitted to the Local Planning Authority for highway improvements to the A5025.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>“iii. Highways upgrades to stretches of the road from A5025 Valley to Wylfa Newydd necessitated by major infrastructure development schemes and other such road upgrades which may be demonstrated and agreed as necessary following further design and assessment and development of an Integrated Traffic and Transport Strategy (ITTS) for the Project including from Amlwch to Wylfa Newydd.”</p> <p><b>Recommendation</b> The Inspector includes NF24 without any amendment</p>
NF25	107	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Horizon still considers that including references in paragraphs 7.1.30 and 7.1.32 regarding "Travel Plans" should be considered; the policy requires Transport Assessments and Transport Implementation Strategies, but does not mention travel plans. It is therefore suggested that these paragraphs are amended to provide further detail regarding the relationship between travel plans and these other two concepts.</p> <p>These changes are required in order to make the plan effective in terms of the soundness tests in PPW.</p> <p>Paragraph 7.1.44 is considered to have been adequately addressed by Focused Change Ref: NF 25.</p>	<p><b>Not Accepted</b> Note the support to NF 25 in addressing their original objection.</p> <p>Travel plans are simply stated to be required where there will be significant transport implications. These are complementary to the transport assessments and design and access assessments. It is set out in 7.1.30 that travel plans are to promote sustainable forms of transport, whereby the methods by which this could be done will be site specific and require to be set out on a case by case basis.</p> <p><b>Recommendation</b> The Inspector includes NF25 without any amendment</p>
NF28	018	Comment	CPRW Gwynedd (Noel Davey)	While some of our specific points have been taken into account, we maintain our scepticism that	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			[1161]	generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. Our fear remains that the weight given to testing all proposals against these generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, when compared with the GUDP, will result in a less effective planning framework and more arbitrary planning decisions. The Plan is not just for planning officers, but for the public as a whole who wish to propose or comment on developments: it will be difficult for them to consider the Plan 'in its entirety' when explicit policies relating to specific types of development are now omitted.	
NF28	130	Object	Welsh Government (Mark Newey) [1561]	The WG maintains its objection to Policy PS5 as currently worded by NF28, which seeks "greater self-containment" in the Centres and Villages. The authorities should clarify how this approach impacts on development in the Centres and why it isn't more appropriate in the less sustainable Villages.	<p><b>Comment noted</b></p> <p>Noted that Welsh Government hasn't presented an objection to the Plan's strategy in terms of its settlement strategy, but did question the limitations placed on growth levels for the different categories of settlement as set out in Policy PS15 and the suitability of including some settlements within the Clusters category in the Settlement Hierarchy. Policy PS5 reinforces the fact that Plan only facilitates limited development within Clusters and their dependency on the network of higher order Villages and Centres, where a range of community services and facilities are available. This approach is considered to be appropriate in terms of facilitating a more self-contained area and settlements: facilitating more local job opportunities and the infrastructure (including housing) required to sustain communities, reducing the need to travel out of the area or</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					leave the area. <b>Recommendation</b> That the Inspector includes NF28 without any amendments.
NF29	068	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	Whilst Bourne Leisure welcomes the recognition that some developments will require a location outside of specified development boundaries, the Company considers that it is important that these circumstances are defined in order that they can be properly taken into account in the determination of planning applications. For holiday parks, there is a need to consider the location of future development in relation to factors such as the needs of the business, visitor demand and wider changes in the industry. The following change is suggested: <b><i>“Proposals should “3. give priority to sites <del>will be approved</del> within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, unless a rural location is essential or there is a specific locational requirement, subject to detailed material planning considerations; <u>specific locational requirements to be considered include the need for development at holiday accommodation parks to be located near the coast”</u> (Focused Change in bold, suggested amendments in bold and underlined).</i>”</b>	<b>Not Accepted</b> The suggested text is too prescriptive and only refers to one category of development that could have specific locational requirement.  <b>Recommendation</b> The Inspector includes NF29 without any amendment.
NF29	115	Comment	CPRW Gwynedd (Noel Davey) [1161]	While some of our specific points have been taken into account, we maintain our scepticism that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. Our fear remains that the weight given to testing all proposals against these generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of	Note the comment

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				<p>development, when compared with the GUDP, will result in a less effective planning framework and more arbitrary planning decisions. The Plan is not just for planning officers, but for the public as a whole who wish to propose or comment on developments: it will be difficult for them to consider the Plan 'in its entirety' when explicit policies relating to specific types of development are now omitted.</p>	
NF29	127	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Horizon considers that criterion 3 is more restrictive in terms of development siting than the Executive Summary (Settlement Hierarchy – para. 1.26 ff) and paragraph 6.22; for example, the former indicates a number of circumstances in which development in open countryside will be permitted.</p> <p>The drafting of criterion 4 is considered by Horizon to be inconsistent with the drafting of the other criteria.</p> <p>Horizon suggest amended wording for Policy PCYFF1.</p>	<p><b>Accepted in Part</b></p> <p>Agree that reference in paragraph 1.26 in relation to development in the countryside refers to a slightly broader range of developments which is a reflection of different specific policies within the Plan e.g. CYF 5, TAI 19 etc. In light of this to ensure consistency with criteria 3 in PS5 suggest additional wording for criterion 3 in the PCYFF 1 policy as highlighted below.</p> <p>Not accepted the suggested changes to other parts of the policy. The housing density is to ensure that sufficient development is achieved on allocated sites to deliver the Plan's anticipated growth level. Criteria 9 and 10 ensure that consideration is given towards highway issues and there is clear cross-referencing to the relevant policy in the transport section of the Plan. Have clarified within the Glossary of Terms the meaning of unacceptable harm.</p> <p><b>Recommendation</b></p> <p>That criterion 3 of NF29 is further amended as shown below and if the Inspector agrees can be</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>treated as a Matters Arising Change during the Examination, but that the remainder of the NF29 changes are accepted without amendments.</p> <p><u>Changes to criterion 3 within Policy PCYFF 1:</u></p> <p><b>3. <u>give priority to sites</u> will be approved</b> within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, <b><u>unless a rural location is essential or it involves an acceptable conversion scheme of a suitable scale and nature or there is a specific locational requirement</u></b>, subject to detailed material planning considerations;</p>
NF30	116	Comment	CPRW Gwynedd (Noel Davey) [1161]	<p>While some of our specific points have been taken into account, we maintain our scepticism that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. Our fear remains that the weight given to testing all proposals against these generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, when compared with the GUDP, will result in a less effective planning framework and more arbitrary planning decisions. The Plan is not just for planning officers, but for the public as a whole who wish to propose or comment on developments: it will be difficult for them to consider the Plan 'in its entirety' when explicit policies relating to specific types of development are now omitted.</p>	Note the comment
NF31	069	Object	Bourne Leisure Ltd [2768]	Bourne Leisure considers that it is of vital importance that any new assessments provided by	<b>Accepted</b> Agree that a landscaping scheme having 'due

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	<p>the Councils are robust and that they are flexible enough to take account of the many different types and locations of development and their associated landscaping schemes. The Company also considers that landscaping schemes associated with new development should only be required to give “due consideration to” rather than “conform with” the specified assessments (PCYFF 3). This would reflect the fact that each development and its landscape context are different.</p> <p>Bourne Leisure therefore requests that the Policy is amended as follows:</p> <p><i>“A landscape scheme should, where relevant:</i></p> <p>1.<i>Demonstrate how the proposed development <del>conforms with</del> has given due consideration to the Landscape Character Assessment, or Seascape Character Area Assessment or other detailed assessments adopted by the Local Planning Authority;” (Policy PCYFF 3, Focused Change in bold, suggested amendments in bold and underlined)</i></p>	<p>consideration to’ the Landscape Character Area or Seascape Character Area Assessment or other detailed assessments adopted by the Local Planning Authority rather than ‘conforms with’ is more appropriate.</p> <p><b>Recommendation</b></p> <p>That criterion 1 of NF31 is further amended as shown below and if the Inspector agrees can be dealt with as Matters Arising Change during the Examination, but that the remainder of the NF31 changes are accepted without amendments.</p> <p><u>Changes to criterion 1 within policy PCYFF 3:</u></p> <p>Demonstrate how the proposed development <b>has given due consideration to <del>conforms with</del></b> the Landscape Character Area Assessment or Seascape Character Area Assessment <b>or other detailed assessments adopted by the Local Planning Authority;</b></p>
NF31	117	Comment	CPRW Gwynedd (Noel Davey) [1161]	<p>While some of our specific points have been taken into account, we maintain our scepticism that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. Our fear remains that the weight given to testing all proposals against these generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, when compared with the GUDP, will result in a less effective planning framework and more arbitrary planning decisions. The Plan is not just for planning officers, but for the public as a whole who wish to propose or comment on</p>	Note the comment

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				developments: it will be difficult for them to consider the Plan 'in its entirety' when explicit policies relating to specific types of development are now omitted.	
NF32	070	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	<p>Whilst Bourne Leisure firmly supports the principle of sustainable development, the Company considers that the requirement for an energy assessment will not be appropriate for every type of development. The Company therefore requests the following amendment to this Policy:</p> <p><b><i><u>"An energy assessment can help identify the most suitable carbon management options for a development and, where appropriate, an energy assessment should be undertaken prior to deciding upon the most suitable course of action to take."</u></i></b> (Policy PCYFF 4, <u>suggested amendments underlined</u>)</p> <p>The scope of any required energy assessment should also be included within the Policy.</p>	<p><b>Accepted</b></p> <p>The Plan wishes to minimise carbon emissions from new developments it is accepted that not all types of developments will require an energy assessment. The details over the type of applications that require an energy assessment should be included within the Design SPG.</p> <p><b>Recommendation</b></p> <p>That the second paragraph of NF32 is further amended as shown below and if the Inspector agrees can be dealt with as Matters Arising Change during the Examination, but that the remainder of the NF 32 changes are accepted without amendments.</p> <p><u>Changes to the second paragraph within policy PCYFF 4:</u></p> <p><b><u>An energy assessment can help identify the most suitable carbon management options for a development and, where appropriate, an energy assessment should be undertaken prior to deciding upon the most suitable course of action to take. The potential options for energy efficiency and renewable energy generation are listed below:</u></b></p>
NF32	118	Comment	CPRW Gwynedd (Noel Davey) [1161]	While some of our specific points have been taken into account, we maintain our scepticism that generalised sustainable development principles can	Note the comment

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				be applied effectively to local planning developments of smaller scale. Our fear remains that the weight given to testing all proposals against these generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, when compared with the GUDP, will result in a less effective planning framework and more arbitrary planning decisions. The Plan is not just for planning officers, but for the public as a whole who wish to propose or comment on developments: it will be difficult for them to consider the Plan 'in its entirety' when explicit policies relating to specific types of development are now omitted.	
NF33	019	Comment	CPRW Gwynedd (Noel Davey) [1161]	We welcome the explicit requirement to place underground transmission cables associated with renewable energy schemes. We note in reference to PS7 that the Council has commissioned additional studies to identify areas suitable for local-authority scale solar farms. We still think a separate explicit policy is needed for solar energy proposals which list the criteria to be met for acceptable sites in a way comparable to that for wind turbines. The proposed policy for wind turbines has now been substantially developed in reaction to developments during the GUDP period. More careful consideration of solar energy policy now might pre-empt development problems later on. The Plan should lead and guide development, not trail behind it.	Note the comment
NF33	062	Object	Welsh Government (Mark Newey) [1561]	The additional text duplicates the Ministerial Letter 'Renewable Energy' September 2015 and adds nothing to the plan. <b>The outcome of the solar assessment should be included in the plan, now.</b>	<b>Accepted</b> The Council are in the process of assessing the suitability of the potential areas for wind farms identified in the Renewable Energy Capacity Study (documents DC.012 & DC.013) against the findings of the Landscape Sensitivity and

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					<p>Capacity Study (2014) (DC.020). This will allow for any suitable areas to be allocated within the JLDP.</p> <p>In light of the changes to the Welsh Government's toolkit as highlighted in focussed change NF33 the Council have commissioned work to assess potential areas suitable for consideration as solar PV farm allocations. These areas will then be subject to assessment against the findings of the Landscape Sensitivity and Capacity study (2014) (DC.020) with any suitable sites being allocated within the JLDP.</p> <p>As set out in the schedule of work provided in response to the Inspector's request for information (DA.002) this work will be completed by the end of June with the Council presenting its findings in July as set out in the Councils' response (DA.003A &amp; B).</p> <p><b>Recommendation</b> The additional work highlighted above be completed and any suitable sites be allocated as potential wind or solar renewable energy areas, and if the Inspector agrees can be treated as Matters Arising Change during the Examination.</p>
NF33	124	Object	CPRW Ynys Môn (Maired Thomas) [1441]	We object to this change because the fact of how the renewable energy capacity studies were conducted means that the JLDP Unit has taken less account of how Anglesey's AONB has been assessed. The National Park is a planning authority the AONB is not represented in this way. The AONB should be re-assessed in accordance with Recommendation 50	<p><b>Not Accepted</b> Recommendation 50 from the Review of Designated Landscape Report final report was published on the 31 July 2015. In light of this report the Welsh Government web-site states: "Due to considerable scale and scope of the recommendations, further work is now needed</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				of the REVIEW OF DESIGNATED LANDSCAPES REPORT which will create an AONB body with statutory powers of action and consultation. Such a body will be able to engage properly with any proposed future assessment or study.	to understand their potential benefit and their consequences.”  The findings of this work are anticipated in 2016.  The energy capacity work that NF33 proposes is in line with guidance produced by the Welsh Government and appropriate regard is given towards the AONB in assessing potential development areas.  <b>Recommendation</b> The Inspector includes NF33 without any amendments in response to this objection.
NF34	030	Comment	National Resources Wales (Angharad Crump) [1521])	We acknowledge the insertion of the following further clarification under Policy 34 to ensure that renewable energy technologies have minimal visual impact; <i>‘To lessen the visual impact of new overhead lines associated with such installations, especially in sensitive locations, the lines should be placed underground unless this causes significant harm to other acknowledged interests or the viability of the scheme, which cannot be negated or mitigated’.</i>	Note the comment
NF34	063	Object	Welsh Government (Mark Newey) [1561]	‘Housing used by visitors on holiday’ falls within the same use class as C3 residential. It is unclear as to why the additional text is necessary.	<b>Not Accepted</b> It is acknowledged that housing used by visitors on holiday does fall within the same use class as other residential properties namely C3. However it is felt that the additional text does provide clarity for people not familiar with the Use Classes Order.
NF34	071	Object	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen	It is Bourne Leisure’s view that all holiday accommodation, and caravans in particular, should be recognised as being sensitive to any negative impacts of renewable energy schemes, particularly given the lower level of noise insulation that these	
					No robust evidence has been published which

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			Ashby-Ridgway) [2767]	<p>structures provide.</p> <p>Given the importance of tourism to the local and regional economy, Bourne Leisure considers that all holiday accommodation should be protected from potential adverse impacts of renewable energy development. Otherwise, there is a risk that tourists may be deterred from visiting or returning to the area, thereby impacting on the local economy. Bourne Leisure therefore requests that the text of this Policy should be amended as follows:</p> <p><i>“i. ensuring that installations in areas covered by international or national landscape designations and visible beyond their boundaries, or areas of local landscape value, in accordance with Strategic Policy PS16 do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character, visual impact, and residential amenity <b>and amenity of holiday accommodation housing used by visitors on holiday</b></i></p> <p><i>“iii. supporting installations outside designated areas provided that the installation would not cause significant demonstrable harm to landscape character, biodiversity, residential amenity, <b>amenity of holiday accommodation housing used by visitors on holiday</b>, either individually or cumulatively.”</i></p> <p>(Policy PS 7, <b>Focused Changes in bold, suggested amendments in bold and underlined</b>)</p>	<p>shows significant impact on tourism in an area due to the effect of wind turbines. A publication is available on the Welsh Government’s website which refers to ‘The Economic Impact of Wind Farms on Tourism’ (February 2014) which concluded that there was limited evidence that wind farms impacted tourism in Wales.</p> <p>An assessment of any application for a turbine would assess its impact on any building in the vicinity, whether residential or tourism. It is felt that extending the policy to account for temporary holiday accommodation structures such as caravans, would be too restrictive.</p> <p><b>Recommendation</b> That the Inspector includes NF34 without any amendments.</p>
NF34	079	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	<p>We support these focussed changes because they are an improvement which is consistent with the current Local Plan.</p> <p>However there needs to be further improvement of Strategic Policy PS7, which we consider unsound.</p>	Note the supporting comment
NF34	119	Comment	CPRW Gwynedd (Noel Davey)	We welcome the explicit requirement to place underground transmission cables associated with	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			[1161]	renewable energy schemes. We note in reference to PS7 that the Council has commissioned additional studies to identify areas suitable for local-authority scale solar farms. We still think a separate explicit policy is needed for solar energy proposals which list the criteria to be met for acceptable sites in a way comparable to that for wind turbines. The proposed policy for wind turbines has now been substantially developed in reaction to developments during the GUDP period. More careful consideration of solar energy policy now might pre-empt development problems later on. The Plan should lead and guide development, not trail behind it.	
NF35	020	Comment	CPRW Gwynedd (Noel Davey) [1161]	We welcome the inclusion of the setting of the AONB and SLA as a criterion for determining the acceptable scale of wind turbines. We continue to oppose the proposed removal of the present criterion which explicitly refuses all wind turbines within the AONB. The justification for this change reducing the level of protection for the AONB compared with GUDP policy has not been adequately made.	Note the comment
NF35	057	Object	Welsh Government (Mark Newey) [1561]	Focussed change NF35: it is not a specific requirement of national policy to apply SLA policy when considering the impact of development proposals outside SLAs this is not the approach reflected in policies MG1 (located directly outside) and ADN1 (the setting of the AONB and SLA). In essence, <b>the Welsh Government does not think it is appropriate to apply a buffer to SLA designations.</b>	<p><b>Accepted</b> That reference to the setting of the SLA should be removed from focussed change NF35 since it is not considered appropriate to apply a buffer to SLA designations.</p> <p><b>Recommendation</b> That NF35 is amended through the removal of reference to the setting of SLA as shown below but that the reference to the setting of the AONB be retained as a Matters Arising Change.</p> <p><u>Changes to criteria 2 &amp; 3 of Policy ADN 1:</u></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>2. <b>Micro-Scale and Small-Scale wind turbine proposals will be granted outside the AONB, SLA and the setting of the <u>AONB, <del>SLA,</del> National Park and World Heritage Site.</u></b></p> <p>3. <b>In the AONB, SLA and the setting of the <u>AONB, <del>SLA,</del> National Park and World Heritage Site</u> only Domestic-Scale wind turbine proposals well related to existing settlements / buildings will be granted.</b></p>
NF35	078	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	<p>We support the focussed changes because they improve the policy and more consistent with the current Local Plan.</p> <p>However it should be noted by the Planning Inspectorate that we believe that the proper process for redefining the SLA on Anglesey was not followed in respect of the relevant legislation and we have corresponded with the JLDP Unit and Anglesey County Council about this matter.</p> <p>The policy as defined within the Deposit Plan takes no account of the Community Consultation or outcomes.</p>	Note the supporting comment
NF38	031	Object	National Resources Wales (Angharad Crump) [1521]	<p>We welcome the direct reference to Coastal Change Management Areas and in particular the inclusion of policy ARNA1.</p> <p>We would however suggest that the policy wording is altered to include the following (see bold and underlined text);</p>	<p><b>Accepted</b></p> <p>It is agreed that the suggested changes would improve the clarity of the Policy. The changes are shown below.</p> <p>The Building Regulations Unit will be consulted regarding stability assessments.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<p><i>‘Proposals for the relocation of existing permanent dwellings in the countryside located in the CChMA predicted to be affected by coastal erosion <b>and/or flood risk</b> will be permitted provided they conform to the following criteria:</i></p> <p>1. <i>The development replaces a permanent dwelling which is affected or threatened by erosion <b>and/or flood risk</b> within 20 years of the date of the proposal’</i></p> <p>With regards to point 6) under Policy ARNA1 we would advise that criteria iii) is altered to include the following (see bold and underlined text);</p> <p><i><b><u>‘where it can be demonstrated that there will be no increased risk to life, nor any significant risk to property and that the development is compliant with TAN15 over its permitted lifetime</u></b></i></p> <p>Policy ARNA1 refers to the need for development within the Coastal Change Management Areas to be supported by Flood Consequence Assessments or Stability Assessments. We wish clarification as to who would review and provide comments on any Stability Assessments as this does not fall under our remit.</p>	<p><b>POLICY ARNA 1: COASTAL CHANGE MANAGEMENT AREAL</b></p> <p><b>Coastal Change Management Areas (CChMA) are identified in Annex 6.</b></p> <p>New <b>Residential</b> Development</p> <p><b>Proposals for new dwellings, replacement dwellings, subdivision of existing buildings to residential use or conversion of existing buildings to residential use will be refused in the CChMA.</b></p> <p><b><u>Permanent relocation of existing homes in the countryside</u></b></p> <p><b>Proposals for the relocation of existing permanent dwellings in the countryside located in the CChMA predicted to be affected by coastal erosion <b>and/or flood risk</b> will be permitted provided they conform to the following criteria:</b></p> <ol style="list-style-type: none"> <li>1. The development replaces a permanent dwelling which is affected or threatened by erosion <b>and/or flood risk</b> within 20 years of the date of the proposal; and</li> <li>2. The relocated dwelling is located an appropriate distance inland with regard to CChMA and other</li> </ol>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>information in the Shoreline Management Plan and where possible it is in a location that is:</p> <p>(i) in the case of an agricultural dwelling, within the farm holding or within or immediately adjacent to existing settlements, <u>or</u></p> <p>(ii) within or immediately adjacent to existing settlements close to the location from which it was displaced;</p> <p>3. The existing site is either cleared and made safe; <u>and</u></p> <p>4. The proposal should result in no detrimental impact on the landscape, townscape or biodiversity of the area.</p> <p><b><u>New or Existing Non-Residential Buildings, Extensions to Existing Dwellings, Community Facilities or Services or Infrastructure</u></b></p> <p>5. New non-residential permanent buildings not associated with an existing use or building will not be permitted in areas within the CChMA <b><u>predicted</u></b> <del>identified</del> as being at risk from coastal change during the first indicative policy epoch up to 2025.</p> <p>6. <del>{outside the indicative policy epoch up to 2025}</del> <b><u>Proposals for the following types of new non-residential development will be permitted on</u></b></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><b><u>sites within the CChMA predicted as being at risk from coastal change during the second indicative policy epoch (2026 – 2055), subject to a compliant Flood Consequence Assessment or a Stability Assessment:</u></b></p> <ul style="list-style-type: none"> <li>i. <b><u>development</u></b> directly linked to the coastal area (e.g. beach huts, cafés, tea rooms, shops, short let holiday accommodation, <b><u>touring caravan sites</u></b>, camping sites, leisure activities); and</li> <li>ii. providing substantial economic and social benefits to the community; and</li> <li>iii. where it can be demonstrated that there will be no increased risk to life, nor any significant risk to property; <b><u>and</u></b></li> <li>iv. subject to either time-limited and/ or season-limited planning permission, as appropriate.</li> </ul> <p>7. Redevelopment of, or extensions to, existing non-residential property or intensification of existing non-residential land uses <b><u>on sites within the CChMA</u></b>, where it can be demonstrated <b><u>by a TAN15 compliant Flood Consequences Assessment or a</u></b></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><b><u>Stability Assessment</u></b> that there will be no increased risk to life, nor any significant risk to property and subject to a time-limited planning permission (where appropriate). <b><u>and that the development complies with NCT15 over the period of its permission; and</u></b></p> <p>Extensions to Existing Dwellings, Community Facilities or Services or Infrastructure</p> <p>Proposals for the following types of development will be permitted in the CChMA, subject to a TAN 15 compliant Flood Consequences Assessment <b><u>or a Stability Assessment:</u></b></p> <ol style="list-style-type: none"> <li>8. limited residential extensions that are closely related to the existing scale of the property and therefore doesn't result in a potential increase in the number of people living in the property;</li> <li>9. ancillary development within the curtilage of existing dwellings that require planning permission <del>subject to prior consent from Natural Resources Wales if it is located within 7m of a main river;</del></li> <li>10. key community infrastructure, which has to be sited in the CChMA to provide the intended benefit for the</li> </ol>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>wider community and there are clear plans to manage the impact of coastal change on it and the services it provides;</p> <p>11. essential infrastructure, e.g. roads, provided that there are clear plans to manage the impact of coastal change on it, and that it will not have an adverse impact on rates of coastal change elsewhere.</p> <p>New or Replacement Coastal Defence Schemes</p> <p>Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the Shoreline Management Plan, and there will be no material adverse impact on the environment.</p> <p>Managing Development</p> <p>Planning conditions will be applied or a planning obligation will be secured where there is a need to: limit the planned life of a development or seasonal use; remove a time-limited development or existing dwellings on cessation of use; review relevant planning permissions; manage the occupancy of a relocated dwelling.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><b>Recommendation</b></p> <p>It is believed that the changes noted above to NF 38 are appropriate and if the Inspector agrees the changes can be treated as Matters Arising Change during the Examination.</p>
NF38	072	Support	<p>Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield &amp; Partners (Helen Ashby-Ridgway) [2767]</p>	<p>Focused Change NF 38 adds “touring caravan sites” to the list of development types which will be permitted on sites within the Coastal Change Management Area that are at risk of coastal change during the period from 2026-2055, subject to a compliant Flood Consequence Assessment or a Stability Assessment and as long as they meet specified criteria (Policy ARNA 1).</p> <p>Bourne Leisure welcomes the inclusion of touring caravan sites in this list of allowable development, as it recognises that this type of development would potentially be suitable despite the risk of coastal change in the medium to long term.</p>	Note the supporting comment
NF40	108	Object	<p>Horizon Nuclear Power (Daniel Harper) [2919]</p>	<p><b>Whilst some amendments have been made to the wording of these paragraphs (Focused Change Ref: NF 40 and NF 42), it is still considered that all the proposed changes suggested in Horizon’s previous representations, need to be incorporated.</b></p> <p>Focused Change Ref: NF 40 relates to paragraphs 7.3.1 - 7.3.9 and has incorporated several of Horizon’s previous recommendations, clarifying which authorities will determine the DCO application for NSIPs and “associated development” and under existing legislation. However, given the progression of the Wales Bill, it is considered that paragraphs 7.3.3 and 7.3.4 should be amended to explain the likely impact this Bill will have upon the Planning Act</p>	<p><b>Not Accepted</b></p> <p>Any changes in legislation will supersede the terms and legislation as set out in the Plan. It isn’t deemed appropriate to refer to legislation which hasn’t been implemented.</p> <p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF40 without any amendments.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				2008 regime and the determination of “associated development” as part of DCO applications.	
NF40	110	Support	Horizon Nuclear Power (Daniel Harper) [2919]	Original objection has been addressed through NF40.	Note the supporting comment
NF42	109	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p><b>Whilst some amendments have been made to the wording of these paragraphs (Focused Change Ref: NF 40 and NF 42), it is still considered that all the proposed changes suggested in Horizon’s previous representations, need to be incorporated.</b></p> <p>Focused Change Ref: NF 42 concerns paragraphs 7.3.10 - 7.3.19. Horizon consider that a number of changes are required to the new wording for clarity and in order to make the plan fit and to be appropriate and effective. Both the wording “linked to the Project” and “fully realised” could be misinterpreted and the proposed wording is considered to be much clearer. It is also considered that the wording of paragraph 7.3.11 should be amended to clarify the likely impact the Wales Bill will have upon the Planning Act 2008 regime and the determination of “associated development”.</p>	<p><b>Not Accepted</b></p> <p>It is considered that the wording of the policy (following the Focus Changes which have been offered) is appropriate and clear.</p> <p>Any changes in legislation will supersede the terms and legislation as set out in the Plan. It isn’t deemed appropriate to refer to legislation which hasn’t been implemented.</p> <p><b>Recommendation</b></p> <p>That the Inspector includes NF42 without any amendments</p>
NF45	043	Comment	Welsh Government (Mark Newey) [1561]	<p><u>Policy PS9: Wylfa Newydd Project Associated Development</u></p> <p>Paragraph 7.3.19 as amended by NF45, highlights the significant employment opportunities at Wylfa Newydd, Menai Science Park and the spin-off opportunities from associated infrastructure projects and new businesses.</p>	Note the comment
NF45	128	Object	Horizon Nuclear Power (Daniel	There appears to be a typo, or some missing words in the final sentence.	<p><b>Agree</b></p> <p>The wording of the Focus Change needs to be</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			Harper) [2919]		<p>amended for clarity and should conform to the Welsh version.</p> <p>The English version should read:-</p> <p><b><u>Environmental constraints in these centres requires the Plan to allocate a site at Y Fforŷ.</u></b></p> <p><b>Recommendation</b> It is considered that the above change to the wording of the introduction paragraph is appropriate. If the inspector agrees the change could be dealt with as a Matters Arising Change during the Examination.</p>
NF45	129	Object	Welsh Government (Mark Newey) [1561]	<p>The authorities should clarify the total number of jobs proposed over the plan period and explain how this aligns to the delivery and phasing of new housing allocations. The timing and delivery of sites in the plan is inextricably linked to the decision to invest in Wylfa. It would be useful for the authorities to explain the impact on job numbers and the effect on housing delivery if the proposal at Wylfa Newydd did not come forward over the plan period.</p> <p>In the absence of infrastructure requirements at Wylfa Newydd, the deletion of associated transport schemes in NF24 and a lack of evidence on costings and timescale, the delivery at Wylfa is unclear. The Councils should identify the infrastructure requirements to support Wylfa Newydd and provide reassurance on its funding and delivery during the plan period.</p>	<p><b>Partly agree</b> The delivery and funding of Wylfa Newydd is beyond the remit of the Joint Local Development Plan. It will be a decision made by the developer post application for the Development Consent Order. Therefore it isn't deemed necessary to amend the Plan in response to this aspect of the objection.</p> <p>Further clarification regarding the alignment of employment allocations and the Plan's housing growth strategy will be provided in an additional topic paper relating to Employment Allocations within the Plan, as well as an updated version of Topic Paper 4B (PT.010). Subject to the Inspector's agreement it is also proposed that "Wylfa Newydd Project Update – January 2016" published by Horizon for informal public consultation is included in the Examination</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>Library. Whilst its inclusion in the Library isn't an indication of the Isle of Anglesey County Council's support of proposed locations for associated developments required to deliver the Wylfa Newydd Project, it does provide useful up to date information about the Project's requirements. The proposed publication of an additional Topic Paper, a refined Topic Paper 4B, as well as information about the type of infrastructure required to facilitate the delivery of Wylfa Newydd are included in a schedule submitted to the Inspector on 31 May 2016 (DA.003A &amp; B)</p> <p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF45 without any amendments</p>
NF46	040	Comment	Welsh Government (Mark Newey) [1561]	The plan has over-provision of 160ha of employment land. The authorities should explain how this substantial over-provision will not have negative implications for land values nor confuse the market and jeopardise growth aspirations	<p><b>Partly agree</b></p> <p>The Councils still contend that there is not an over-provision of land for employment in the Plan area and the approach is in accordance with the Plan's strategy. It aligns with status afforded to Anglesey as an Enterprise Zone, which includes identifying a number of sites that will benefit from this designation. For further clarity regarding the provision of employment land within the Plan it is proposed that an additional topic paper is produced which will set out the justification for the proposed employment allocations. The proposed Topic Paper is included in a schedule of documents submitted to the Inspector on 31 May 2016 (DA.003A &amp; B)</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><b>Recommendation</b> That the Planning Inspector includes NF46 without any amendments.</p>
NF47	041	Comment	Welsh Government (Mark Newey) [1561]	<p>In Policy CYF1 (as amended by NF47), the vacant land area on safeguarded and allocated employment sites total 340ha. By deducting the identified need for 180ha, <b>the plan has an over-provision of 160ha of employment land.</b> The authorities should explain how this substantial over-provision will not have negative implications for land values nor confuse the market and jeopardise growth aspirations.</p> <p>Several 'strategic regional employment sites' totalling 230ha are identified for development in Policy CFY1. It is unclear if competition from similar energy related uses will impact on site delivery and the authorities should explain how all 'strategic regional employment sites' can be delivered in the plan period.</p> <p>NF47 amends Policy CFY1 to identify employment sites by strategy area in Anglesey, with over 190ha in Urban Service Centres but none in the Villages. <b>The authorities should explain the disproportionate approach to employment land in Anglesey and how it aligns with the spatial strategy and plan objective to maximise job opportunities for new homes in the Villages.</b> It would be useful to understand how the sequential approach in TAN 23 has influenced site selection, particularly in Anglesey.</p>	<p><b>Partly agree</b></p> <p>For further clarity regarding the provision of employment land within the Plan it is proposed that an additional topic paper is produced which will set out the justification for the proposed employment allocations.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF47 without any amendments.</p>
NF50	021	Comment	CPRW Gwynedd (Noel Davey)	TWR5. We continue to question the wisdom of maintaining a permissive policy for new touring	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			[1161]	caravan sites in all areas. While the need for a more restrictive policy for static caravans has been accepted, it is being ignored in the case of touring units on the grounds that they have less impact on the landscape because of their 'transient' features. We argue that in reality their landscape impact for 8 months of the year is considerable and far from 'transient'. We believe the visual impact of touring caravans risks becoming at least as significant as that from statics. The lack of evidence regarding the recent spread of touring sites and their actual landscape impact is a serious gap in the JLDP Analysis and supporting Topic Paper.	
NF50	024	Objection	First Investments Limited [3091] c/o DPP (Jonathon Burns) [1458]	Focused change ref. NF 50 alters section 7.3.36 in relation to the change of use of B1-B8 use classes for alternative uses. Whilst the inclusion of 'impact of reduction of job opportunities for the local community' is reasonable it is our client's view that this section still does not fully cover the necessary considerations. Further to the listed considerations in justifying the change of use, a key consideration should also be the potential benefits of any proposed alternative uses. Without this consideration of the benefits balanced against any perceived negative impacts this policy cannot be conducive to sustainable development. Furthermore the current wording also excludes the consideration of possible benefits for the local economy and employment opportunities arising from any change of use. This oversight ignores the potential scenario whereby a change of B1-B8 uses to alternative uses may have a positive net impact for employment and the local economy.	<p><b>Accepted in part</b></p> <p>The Focus Change referred to was included to provide a more comprehensive schedule of matters to be considered. Although the schedule wasn't intended to be an exhaustive one, it is considered that there is merit in referring to need to also consider whether other priorities, such as housing need, override more narrowly focussed economic considerations. This would ensure that the Policy aligns with national planning guidance included in TAN 23 Economic Development:</p> <p><b>POLICY CYF4: ALTERNATIVE USES OF EMPLOYMENT SITES</b></p> <p><b>Proposals to release employment land on sites safeguarded or allocated for Use Classes B1, B2 or B8 in accordance with Policy CYF1 for</b></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>alternative uses will be granted only in special circumstances, provided they conform to the following criteria:</p> <ol style="list-style-type: none"> <li>1. If the site is vacant, that it is unlikely to be used in the short and medium term for the original use or the safeguarded use and there isn't a viable business or industrial use for the site;</li> <li>2. There is an over provision of employment sites within the vicinity;</li> <li>3. The current employment use is having a detrimental effect on amenity and the environment;</li> <li>4. The proposal would not have a detrimental effect on employment uses at adjacent sites;</li> <li>5. There is no other suitable alternative site for the proposed use <u>and the need for the alternative use on the site overrides the economic considerations</u>;</li> <li>6. If the site is used in the short term (on a temporary basis) it should be assured that there are appropriate restoration measures in place to the satisfaction of the Local Planning Authority.</li> </ol> <p><b>Recommendation</b> It is considered that the above change is appropriate. If the inspector agrees, the change</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					could be dealt with as a Matters Arising Change during the Examination.
NF51	120	Comment	CPRW Gwynedd (Noel Davey) [1161]	TWR5. We continue to question the wisdom of maintaining a permissive policy for new touring caravan sites in all areas. While the need for a more restrictive policy for static caravans has been accepted, it is being ignored in the case of touring units on the grounds that they have less impact on the landscape because of their 'transient' features. We argue that in reality their landscape impact for 8 months of the year is considerable and far from 'transient'. We believe the visual impact of touring caravans risks becoming at least as significant as that from statics. The lack of evidence regarding the recent spread of touring sites and their actual landscape impact is a serious gap in the JLDP Analysis and supporting Topic Paper.	Note the comment
NF52	064	Object	Welsh Government (Mark Newey) [1561]	The purpose, applicability and implementation of this proposed FC is impenetrable and appears to delve into non planning matters. In addition, there is text which appears to be policy requirements i.e. a market appraisal. This FC needs rewording.	<p><b>Accepted in part</b></p> <p>The aim of this Focus Change was to try to articulate the reasoning behind including criterion 8 in Policy TWR 2, referring to the type of evidence that the Councils would expect at a planning application stage. In light of the comment a proposed change is suggested to paragraph 7.3.57 and 7.3.59 try to improve clarity:</p> <p>7.3.55 <u>Evidence about occupancy rates suggests that good quality self-serviced accommodation generally continues to be a popular choice for visitors.</u> Policy PS11 and Policy TWR2 <u>also</u> recognizes that managing the</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>wide range of high quality self-serviced accommodation is essential in providing visitors with choice. The policy therefore aims to support the principle of providing high quality self-serviced holiday accommodation in sustainable locations which presents such a choice.</p> <p>7.3.57 Historically national planning guidance and local planning policy (particularly within the Gwynedd Local Planning Authority area) has given priority to the conversion of existing buildings in the countryside for economic use. This means that within some areas there is an abundance of buildings that have been converted to self-serviced accommodation. <u>Therefore, there is concern about oversupply of self-serviced accommodation in some parts of the Plan area. This could mean that providers and operators may not receive the anticipated return in income from what may be a significant investment.</u> Clearly it is not the intention of national guidance or the Council for this policy to lead an over-concentration of this type of holiday accommodation within a particular location, <u>which could result in businesses failing. Applicants will be required to submit either a full market appraisal or a detailed business plan, which demonstrates the robustness of the proposed scheme. This would</u></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><u>enable the Council to assess whether the scheme has a realistic chance of being viable, is not speculative in nature, and would help to make sure that there is no loophole to allow the redevelopment of existing buildings in the countryside for holiday use, and then allow them to convert to residential use if shown to be unviable in holiday use</u> <del>provide evidence of the level of occupancy required to make the business viable.</del> Supplementary Planning Guidance will be published to provide more information about the matter.</p> <p><b>Recommendation</b> It is considered that the above change is appropriate. If the inspector agrees, the change could be dealt with as a Matters Arising Change during the Examination.</p>
NF52	121	Comment	CPRW Gwynedd (Noel Davey) [1161]	TWR5. We continue to question the wisdom of maintaining a permissive policy for new touring caravan sites in all areas. While the need for a more restrictive policy for static caravans has been accepted, it is being ignored in the case of touring units on the grounds that they have less impact on the landscape because of their 'transient' features. We argue that in reality their landscape impact for 8 months of the year is considerable and far from 'transient'. We believe the visual impact of touring caravans risks becoming at least as significant as that from statics. The lack of evidence regarding the recent spread of touring sites and their actual landscape impact is a serious gap in the JLDP	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				Analysis and supporting Topic Paper.	
NF53	122	Comment	CPRW Gwynedd (Noel Davey) [1161]	TWR5. We continue to question the wisdom of maintaining a permissive policy for new touring caravan sites in all areas. While the need for a more restrictive policy for static caravans has been accepted, it is being ignored in the case of touring units on the grounds that they have less impact on the landscape because of their 'transient' features. We argue that in reality their landscape impact for 8 months of the year is considerable and far from 'transient'. We believe the visual impact of touring caravans risks becoming at least as significant as that from statics. The lack of evidence regarding the recent spread of touring sites and their actual landscape impact is a serious gap in the JLDP Analysis and supporting Topic Paper.	Note the comment
NF54	073	Support	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	Policy TWR 3 indicates the circumstances when proposals to improve existing static and chalet sites will be permitted within certain areas, including Special Landscape Areas. Focused Change NF 54 adds that an increase in the number of caravan or chalet units in these areas may be permitted if the development proposal involves the "relocation of existing static and chalet parks within the Coastal Change Management Area" (Policy TWR 3). Bourne Leisure welcomes this Focused Change in principle, as it recognises that there is a need for flexibility when dealing with the impact of coastal change. The tourism industry plays a vital role in supporting jobs and investment within the local economy, and it is important that this is reflected in the Plan.	Note the supporting comment
NF54	123	Comment	CPRW Gwynedd (Noel Davey) [1161]	TWR5. We continue to question the wisdom of maintaining a permissive policy for new touring caravan sites in all areas. While the need for a more	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				restrictive policy for static caravans has been accepted, it is being ignored in the case of touring units on the grounds that they have less impact on the landscape because of their 'transient' features. We argue that in reality their landscape impact for 8 months of the year is considerable and far from 'transient'. We believe the visual impact of touring caravans risks becoming at least as significant as that from statics. The lack of evidence regarding the recent spread of touring sites and their actual landscape impact is a serious gap in the JLDP Analysis and supporting Topic Paper.	
NF59	045	Comment	Welsh Government (Mark Newey) [1561]	<p>The proposed focussed change introduces a link from the plan to a new housing trajectory. (Housing Trajectory, PT.033, February 2015). The Welsh Government supports the additional work undertaken by the Council which numerically demonstrates a 5 year supply from examination. However, the Welsh Government considers that the trajectory has some short-comings. <b>It is unclear from the trajectory, the interrelationship of all the components of supply over the plan period and their relationship to maintaining a five year supply.</b> Appendix 2 only summarises them in one column. It is also unclear as to how the flexibility allowance relates to the trajectory. It is unclear whether the 10% is sufficient, to deal with issues of under delivery at key 'pinch points' in the trajectory. This will be a matter for the LPA to demonstrate.</p> <p>The trajectory flags up that there has been under delivery in the early years of the plan and there would need to be a significant step increase in build rates to deliver the strategy and level of provision required. It will be for the authority to demonstrate</p>	<p>Comment 045 <b>Accepted in part</b> It is agreed that refinements are necessary to the Housing Projection Topic Paper (PT.033) to ensure that the description of the method used by the Councils to show the 5 year supply of housing units during the remainder of the Plan is clearer. The intention to publish a revised version of the Topic Paper has been included in a list submitted to the Inspector on 31 May 2016 (DA.003A &amp; 3B)</p> <p>Comment 087 <b>Accepted in part</b> The Councils want to ensure that actual land is available to meet the number of housing units identified in Policy PS13 and the Plan's Detailed Policies. Focussed Change NF59 refers to using a planning mechanism designed to try to improve matters in the supply of housing after getting planning permission. That will also contribute to the ability to monitor the implementation of policies, which could lead to a review of</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<p>that it can deliver the necessary rates and maintain a 5 year supply. However, given the challenging build rate as highlighted from the trajectory this could negate the justification for 'new Policy TAI X ' in respect of phasing restrictions.</p>	<p>designations to bring alternatives into the Plan if necessary. It is agreed that the wording of the sentence referred to suggests that the Councils will use the tools such as the norm. A change as shown below would improve the clarity of the Focussed Change.</p>
NF59	087	Object	Cadnant Planning (Rhys Davies) [483]	<p>On behalf of a number of clients we object to NF59 which refers to the granting of "short term consents". At the initial stage of the Plan making process we see no need for a policy which imposes a short period for implementation of a residential planning consent as the norm.</p> <p>Housing developments can often take some time post granting of planning permission to come to fruition due to matters relating to the need for subsequent consents such as Protected Species Licensing; Highway Consents etc. In addition to the need in many cases to secure funding or advance sales.</p> <p>We accept that if there is evidence of landowners land-banking consents or not bring forward allocated housing sites for commercial reasons then the matter of shorter-term consents can be proposed on additional sites coming forward to deal with shortfall in the 5 year supply of housing land. However, that should be an exception not the norm.</p> <p>We propose therefore that NF59 is deleted.</p>	<p>This is the change:</p> <p>Local authorities can identify the number of homes needed, but the number actually built each year will be heavily influenced by factors outside their control. The Plan period (2011 – 2026) includes a time of continued economic and financial uncertainty. Market conditions continue to be weak and this is likely to mean that house building in the short term will remain subdued. To help progress housing delivery in the short term each Council and its partners are exploring and/ or implementing local initiatives.</p> <p><b><u>Using the best available information Topic Paper X seeks to provide a housing trajectory incorporating the likely phasing/delivery of housing schemes and indicating the housing land supply position throughout the plan period. In undertaking the exercise it is demonstrated as far as is possible that the requirement to maintain a 5 year land supply will be achieved throughout the Plan period. In appropriate cases, based on necessary evidence planning mechanisms, such as short term consents, will be used where appropriate to seek to ensure that sites with planning consent will deliver the required homes.</u></b></p>

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					<p><b>Recommendation</b></p> <p>It is believed that the change noted above to NF 59 is appropriate and if the Inspector agrees that change can be treated as a Matter Arising during the Examination.</p>
NF61	046	Object	Welsh Government (Mark Newey) [1561]	It is unclear what is meant by the proposed insertion of 'community capacity'.	<p><b>Accepted</b></p> <p>The Glossary of Terms refers to the fact that the level of housing expected during the Plan is based on an understanding of a number of factors, which include social and economic considerations and community sustainability. It is agreed that the current wording is not clear enough. The changes shown below will improve clarity.</p> <p><b>STRATEGIC POLICY PS13: HOUSING PROVISION</b></p> <p>Based on the level of anticipated housing need, balanced against deliverability, environmental constraints and landscape <b>and communities, economic and demographic prospects, and potential demographic profile</b> capacity, the Councils will make provision for a requirement for 7,184 housing units between 2011 and 2026. This requirement will be met by identifying opportunities for around 7,902 housing units to enable a 10% slippage allowance.</p> <p>A constant minimum 5 year supply of housing land will be maintained by allocating land and facilitating development on windfall sites and by using existing buildings in accordance with the</p>

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					<p>following housing targets:</p> <ol style="list-style-type: none"> <li>1. a baseline requirement, which equates to 2,604 housing units between 2011 and 2018</li> <li>2. provision for growth, which equates to 5,298 housing units between 2018 and 2026</li> </ol> <p>This level of growth will be distributed in accordance with Strategic Policy PS15 and policies TAI14 to TAI18 and will be monitored on an annual basis <b><u>via the annual Joint Housing Land Availability Studies and the Annual Monitoring Reports.</u></b></p> <p><b>Recommendation</b> It is believed that the change noted above to NF 61 is appropriate and if the Inspector agrees that change can be treated as a Matter Arising during the Examination.</p>
NF62	047	Object	Welsh Government (Mark Newey) [1561]	<p>The proposed focussed change includes a new policy that appears to restrict and control all housing allocations and windfall development over the plan period. <b>We object on the basis that the rational for controlling the phasing of allocations and windfalls sites is not clearly justified.</b> Attaining the higher build rates will only be feasible if the larger sites come forward as phased. It is vital that the monitoring framework identifies any significant shortfalls and is sufficiently robust to ensure the strategy is delivered. PPW (paragraph 2.5) advocates that phasing strategies should be flexible to allow for</p>	<p>Comment 047 and comment 088</p> <p><b>Accepted in part</b> The Councils are keen to manage housing developments carefully in order to ensure that the Plan's strategy will be realised. On the whole, it is not major construction companies who are responsible for building houses in the Plan area. Instead, a large number of individual land owners or relatively small local construction companies are making planning applications. Although smaller developments are an</p>

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				<p>choice and to ensure that housing markets are effective. It states that phasing policies in the plan should only give a broad indication of the timescales for the release of the main development areas or identified sites, rather than an arbitrary numerical limit on permissions, or a precise order of release of sites in particular periods. <b>On this basis we consider the proposed policy does not comply with national policy.</b> It would not be appropriate to delay sites that are not constrained or integral to the delivery of key infrastructure in the plan where there is a high level of demand for private and affordable homes. Such an approach would compound the problems of housing land supply.</p>	<p>important and steady contributor in terms of adding to the housing stock, there are examples in the past of planning applications being made without a clear intention of operating on them in the near future. The Councils have also been tolerant in terms of handling applications to renew planning permissions. We also have examples of land with planning consent that are kept as valid by making a 'technical start'. The Council is keen to avoid a situation where there is a gap between what is permitted and what with being built. It is also believed that there is a basis for the promotion of a phased/ step by step development of those individual sites to</p>
NF62	088	Object	Cadnant Planning (Rhys Davies) [483]	<p>On behalf of a number of clients we object to NF62 which refers to the granting of "short term consents". At the initial stage of the Plan making process we see no need for a policy which imposes a short period for implementation of a residential planning consent as the norm.</p> <p>Housing developments can often take some time post granting of planning permission to come to fruition due to matters relating to the need for subsequent consents such as Protected Species Licensing; Highway Consents etc. In addition to the need in many cases to secure funding or advance sales.</p> <p>We accept that if there is evidence of landowners land-banking consents or not bring forward allocated housing sites for commercial reasons then the matter of shorter-term consents can be proposed on additional sites coming forward to deal with shortfall in the 5 year supply of housing land.</p>	<p>reduce the potential impacts of new developments, such as the negative impact on the community (including the Welsh language), and/or to respond to issues related to physical infrastructure or the adequacy of services. This may mean that it will not be appropriate/ practical to expect some sites to be developed until a specific time during the Plan period. Topic Paper 19 Profiles of Settlements (PT.0 32) gives some information about the additional infrastructure needed to obtain housing on some sites identified in the Plan. Topic Paper 20 Housing Projections (PT.0 33) shows when we expect to see development occurring at individual sites during the plan period. It is believed that there is a basis to refine these Topic Papers to give a clearer picture of the situation.</p> <p>It is believed that there is a firm basis for keeping the policy in the Plan.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<p>However, that should be an exception not the norm.</p> <p>A condition imposing completion dates on developments would not comply with WGC 016/2014.</p> <p>In view of the forgoing we propose therefore that NF62 is deleted.</p>	<p>It is agreed that it would not be appropriate to prohibit or slow down development on sites where there is no restriction on them. To avoid this misunderstanding, it is suggested amending the wording as follows, as well as including a definition of the terms used in the policy:</p> <p><b><u>New Policy TAI X</u></b></p> <p><b><u>In order to ensure that there is actual land available to meet the number of houses identified in Policy PS13 and Policies TAI 14 to TAI 18 and to ensure that different communities are able to accommodate residential development, the Councils will, where appropriate:</u></b></p> <p><del><u>seek a phased release of housing in relation to allocated sites or in relation to windfall sites.</u></del></p> <p><del><u>In order to improve delivery of homes as set out in Policy PS13 and Policies TAI 14 to TAI 18:</u></del></p> <ol style="list-style-type: none"> <li><b><u>1. require a phased build of housing on designated and windfall sites in Service Centres and Villages where evidence shows that keeping control over the rate of development in the settlement is an important consideration;</u></b></li> <li><b><u>2. give short term planning permission for development on sites in Clusters and Rural Exception Sites will be given at</u></b></li> </ol>

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					<p><del>the discretion of the Council; or</del></p> <p>3. <del>use a completion date condition for housing developments where there is evidence that permissions are not operated upon; may be conditioned with completion dates; or</del></p> <p>4. <del>not to renew</del> outline, reserve matters and full consents <del>will not be renewed</del> except with strong justification.</p> <p><b>Explanation:</b></p> <p><b>7.4.12a</b> Planning Policy Wales states that <u>development may need to be phased, where appropriate in consultation with the relevant utilities/ infrastructure providers, to allow time to ensure that the provision of utilities/ infrastructure can be managed in a way consistent with general policies for sustainable development. Development may also need to take the ability of different communities to accommodate the development without eroding their character, including their linguistic character.</u></p> <p><b>7.4.12b</b> <del>Criterion 1 The first part of the policy</del> sets out that allocated sites and <del>significant</del> windfall sites <del>may be granted permission within the Service Centres and Service Villages may be</del> <u>subject to a condition to build in a</u></p>

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					<p>number of stages. <u>Criterion 1 is not applicable to the rest of the settlements in the Settlement Hierarchy because there are no housing designations for them and so what that is going to be developed will be on a scale that the settlement and community can cope with.</u> This staged approach will allow some control in ensuring that infrastructure and communities are able to absorb development. The <u>decision over the need for conditions and the number of appropriate stages appropriate for each allocated site or windfall site</u> will be determined at the pre-application stage in discussion with the applicant taking into account current commitments and delivery within the settlement along with any specific requirements in relation to the delivery of the <u>allocated</u> site in question. The Councils recognise that there will be sites where phased release will not be necessary, appropriate or relevant and that early discussion with the Councils prior to submitting any application will help establish whether phased release is <u>to be applied required. This phased approach does not preclude the need, where appropriate, for a clear masterplan to be submitted by the applicant upfront regarding the overall layout of the whole site.</u></p>

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					<p>7.4.12c <u>The intention of the rest of the criteria in Policy TAI X is intended to improve delivery of completed housing rather than of planning consents. There has been a tendency to secure planning consents in settlements in the past without the clear intent to implement or deliver the units in the foreseeable future. This has often resulted from a pressure to secure a planning permission before the 'build quota' for a village is used up. Some planning consents have also been preserved as being extant by virtue of 'technical starts' which support the motivations, in some instances, for obtaining planning consent rather than secure a commercial intention to build. All these factors are tending to hamper genuine housing delivery and responsiveness to immediate needs. It is not the intention of criteria 2-4 to punish those who intend to build. It is believed that it will be appropriate to impose a short term planning condition or a completion date condition for housing developments in Clusters, on Rural Exception Sites or local market housing in order to address immediate needs for affordable housing and housing local market as demonstrated at a planning application stage and as referred to in Policy TAI 5, TAI 9 and TAI 18.</u></p> <p>7.4.12ch The policy will aid the Councils in</p>

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					<p><b><u>securing a genuine five year land supply as required by the Joint Housing Land Assessments published by the Councils in response to national planning policy.</u></b></p> <p><b>Recommendation</b> It is believed that the changes noted above to NF 62 are appropriate and if the Inspector agrees that change can be treated as a Matter Arising during the Examination.</p>
NF63	111	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Horizon considers that the only element of Chapter 7.4 which should apply to the Wylfa Newydd worker accommodation strategy and, more specifically, aspects of the worker accommodation is Policy TAI3.</p> <p>Focused Change Ref: NF 63 amends paragraph 7.4.13 to include the sentence, "In addition vacant / under used buildings could be one of the options to contribute towards meeting part of the need for Temporary Construction Worker Accommodation". Whilst Horizon does not object to this change, it considers that the potential to use of existing buildings to accommodate construction workers is limited and, depending on the location of these buildings, could result in adverse traffic impacts.</p> <p>Horizon suggests that proposed Wylfa Newydd specific policies.</p> <p>However, if these Wylfa Newydd specific policies are not to be incorporated into the Plan then Horizon considers that the following amendments are required to make the Plan sound:</p>	<p><b>Not Accepted</b></p> <p>Policy TAI 8 which is in relation to Residential Use of Caravans, Mobile Homes or other forms of Non-Permanent Accommodation, can provide development for temporary residential accommodation in association with an approved building project. In light of this and the change under NF63 to paragraph 7.4.13 it is not appropriate to state that policy TAI 3 is the only policy in this chapter which applies to temporary construction workers accommodation in relation to the Wylfa Newydd project.</p> <p><b>Recommendation</b> That the Inspector includes NF63 without any amendments.</p>

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				<p>Add a new paragraph 7.4.11 after 7.4.10: <b><u>“For the avoidance of doubt, the only policy in this chapter which applies to Temporary Construction Worker Accommodation delivered in relation to the Wylfa Newydd Project is Policy TAI3, which relates to the provision of purpose built accommodation for construction workers.”</u></b></p>	
NF67	048	Object	Welsh Government (Mark Newey) [1561]	<p>The WG Deposit response requested clarification on the target of 1,415 affordable units. It was unclear what the contribution to meeting these targets would be from current commitments, allocations and other potential sources of provision.</p> <p>The Welsh Government considers that the proposed FC adds clarity to the plan. However, the clarity and understanding of the plan would be further improved if a similar table was included to support the overarching housing Policy PS13. At present there is no single summary table setting out the various components of supply, in relation to the housing provision.</p>	<p><b>Accepted in Part</b></p> <p>The Council question whether this objection is duly made since it refers to policy PS13 whilst this Focussed Change is in relation to policy PS14. A review of comments made on the Deposit Plan PS 13 reveals that the only comments made by the Welsh Government were in relation to justification over the Phasing and how the targets will be used to maintain a 5 year housing land supply.</p> <p>Notwithstanding this matter the Council feels that tables 18 and 19 in the introduction to policy PS15 does provides a summary of the position in the different tiers of settlements. It is felt that introducing a table within the Plan that gives a breakdown for each individual settlement would be too detailed and immediately be dated as units are completed and additional sites given planning permission. However to draw together the information about the anticipated growth, completions to date, existing land bank, allocations and windfall provision a detailed</p>

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					<p>table will be introduced within the amended Topic Paper 20 Housing Trajectory.</p> <p><b>Recommendation</b> The Inspector includes NF67 without any amendment however, Topic Paper 20 Housing Trajectory is amended through the inclusion of a table outlining the components of supply.</p>
NF68	055	Object	Welsh Government (Mark Newey) [1561]	<p>The Welsh Government supports this FC. This FC introduces changes to TAI 9 to clarify the provision of affordable dwellings where the contribution would be less than one unit; and the process for involving external advice where agreement cannot be reached on viability issues.</p> <p>However, the Welsh Government objects to the omission of the following. As raised in our Deposit response, given the evidence identifies areas of strong viability, policy <b>TAI 9 should include text to explain that contributions higher than the specified targets may be sought where supported by evidence.</b> Policy TAI 9 should more explicitly state that, in accordance with PPW 9.2.19, the authorities will seek to negotiate with developers when affordable housing is being sought.</p>	<p><b>Not accepted</b> Note the support for NF68 and that their original objection seeking additional wording to explain that contributions higher than the specified targets may be sought where supported by evidence.</p> <p>The Council are still of the opinion that the wording 'At least' within the policy allow for a higher level of affordable provision as sought by the objector.</p> <p><b>Recommendation</b> The Inspector accepts NF68 without any amendments.</p>
NF69	056	Object	Welsh Government (Mark Newey) [1561]	<p>The Welsh Government supports the focussed change, however the Council will need to ensure that the monitoring framework is amended to record and capture the necessary data.</p> <p>However, the Welsh Government objects to the omission of the following. As raised in our Deposit response, <b>the supporting text to TAI 9 should</b></p>	<p><b>Not accepted</b> As noted in the response to the comments that were received in relation to the deposit plan, part 3(i) of the policy refers to the need for developments to achieve an appropriate mix in terms of housing types and house sizes of local need affordable housing. This would be determined by the Local Housing Market</p>

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				<p><b>explain that the range/type/mix of affordable housing can have financial implications for the delivery of housing on site.</b> The percentage sought could be higher/lower to reflect this. Acknowledging this and providing a context for future discussions would strengthen the policy approach.</p>	<p>Assessment or any alternative Council or partner assessment.</p> <p>Policy TAI1 specifies that the correct type of housing should be provided, which includes the affordable housing provision. This requirement should be balanced against the target of providing the specified number of affordable housing per site, as is noted in Policy TAI9.</p> <p>Part 3(iii) of the policy notes the possibility of providing a lower percentage of affordable housing. This however would have to be justified. It is also noted that the percentages noted in policy TAI9 are minimum figures and a higher percentage of affordable housing can be provided on a particular site.</p> <p>It is important therefore not to undermine the policy and its intentions, especially given that it is based on specific evidence. As previously noted, the policy does not include a specific range / type/ mix of housing, rather it notes the need to consider this based upon any evidence available as individual applications are assessed.</p> <p><b>Recommendation</b> That the Inspector includes NF69 without any amendment.</p>
NF70	049	Object	Welsh Government (Mark Newey) [1561]	<p>Whilst the Welsh Government is supportive of the updated evidence base provided in the Gypsy and Traveller Accommodation Needs Assessment 2015, this is subject to scrutiny by the Welsh Government's Fairer Futures Division and Ministerial</p>	<p><b>Accepted</b> It is agreed it would be beneficial to include the reports on the Gypsy and Traveller Accommodation Needs Assessment in the Examination Library. The reports have been</p>

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				<p>approval (anticipated Summer 2016). <b>The authorities should make this assessment available as it forms part of the LDP's evidence base.</b></p> <p><b>The plan is still failing to meet its statutory duties under the Housing (Wales) Act 2015 (Section 103)</b> to make sufficient provision to meet the immediate level of identified need from 2015 to 2020 for permanent pitches (shortfall of 4 pitches). In the absence of the updated study, it is also unclear as to whether temporary stopping places (requirement for 3 sites) are the appropriate solution in relation to transit pitch needs for the area. In essence there is a lack of detail on the number of pitches required and the timescale for their delivery.</p> <p><b>The plan is also required to quantify and meet the level of need over the whole plan period (up to 2026) in line with the requirements of the Welsh Government's Circular 30/2007, paragraph 17.</b> At present the plan does not do this.</p>	<p>included in a list of documents requested by the Inspector (see DA.002). See response to the Inspector's letter (DA.003A &amp; B).</p> <p>The Councils would like to confirm that the final report of the Gypsy and Traveller Accommodation Needs Assessment 2015 will record the level of need for the full duration of the plan (to 2026). It is agreed that there is a need to amend paragraphs 7.4.89 and 7.4.90 to reflect this.</p> <p>Since issuing the Schedule of Focussed Changes for public consultation, work is nearing completion to identify a temporary stopping site in Caernarfon. The Councils' response to a request for an update about the matter from the Inspector (DA.002 and DA.003A &amp; B) sets out the intention to prepare a statement about the matter during the week beginning 13 June 2016. This site and the site designated in the Deposit Plan and Focussed Change NF 115 will address the demand for pitches in the Gwynedd Planning Authority area.</p> <p>Anglesey County Council is aiming to make a decision about the site to address the need for permanent pitches for Travellers at a meeting of the Executive Committee on 31 May 2016. The aim is to be in a position to make a decision about the location of sites to address the demand for temporary stopping pitches on the Island by the end of July 2016. The Councils' response to a request for an update about the matter from the Inspector (DA.002 and DA.003A</p>

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					<p>&amp; B) sets out the intention to publish documents about the matter and the timescale for doing so.</p> <p>These are the suggested changes:</p> <p>7.4.89 <b><u>Housing (Wales) Act 2014 places a duty on local authorities to provide sites for Gypsies and Travellers where a need has been identified.</u></b> In accordance with the Housing Act 2004, the North West Wales and Flintshire Gypsy and Traveller Accommodation Needs Assessment (GTANA) (2011) was undertaken for all the North Wales Local Planning Authorities apart from Wrexham (who had undertaken a separate study). <b><u>A Gwynedd and Anglesey Gypsy and Traveller Accommodation Needs Assessment was undertaken in 2015 in accordance with Welsh Government guidelines to identify unmet need for the Plan period (to 2026) of 5 years.</u></b></p> <p>7.4.90 The findings of the GTANA 2015 indicate that there is a requirement for <del>11</del> <b><u>4 permanent</u></b> residential pitches to replace the existing tolerated site near Pentraeth Road, Anglesey and a requirement for an additional <del>10</del> <b><u>11 permanent residential</u></b> pitches in Gwynedd <b><u>up to 2026 over the next 5 years.</u></b> The GTANA 2015 also <b><u>recommended allocating two temporary stopping places along the A55 on Anglesey (one in the Holyhead area and one in the centre of the Island), and one</u></b></p>

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					<p><b><u>in Caernarfon to cater for Gypsies and Travellers who have regularly made unauthorised encampments in the area.</u></b></p> <p>There are currently no authorised transit sites in North Wales. ‘Transit’ pitches can either be on formal sites that are similar to permanent residential sites but the occupier can only stay up to 3 months. Alternatively they can be temporary stopping places <b><u>where occupiers can stay for shorter periods.</u></b> Conwy County Borough Council and Denbighshire County Council are currently working together to identify <b><u>develop a</u></b> permanent residential Gypsy and Traveller site <b><u>near Conwy</u></b> as well as <b><u>and to provide a</u></b> formal transit site.</p> <p><b>Recommendation</b> It is believed that the change noted above to NF 70 is appropriate and if the Inspector agrees that change can be treated as a Matter Arising during the Examination.</p>
NF72	050	Comment	Welsh Government (Mark Newey) [1561]	<p><u>Policy TAI11: Safeguarding Existing Gypsy &amp; Traveller Sites</u></p> <p>The wording in Policy TAI 11 should be broadened to cover both Gypsies <u>and Travellers</u> to accord with the wording in Policy TAI 12.</p>	<p><b>Comment is noted</b></p> <p>The wording of Policy TAI 11 reflects the fact that the current site near Llandygai is protected and managed for Gypsies only. This is consistent with the need to avoid conflicts between different lifestyles. It is believed that referring to it as a site for Gypsies and Travellers would create confusion.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF 72</p>

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					without any change.
NF72	051	Comment	Welsh Government (Mark Newey) [1561]	<p><u>Policy TAI 12: Gypsy and Traveller Site Allocations</u></p> <p>We support the change in the policy wording which covers 'Gypsy and Traveller use'. The authorities should consider making a corresponding change in the table, in the 'occupants' column to widen the scope to include both Gypsies and Travellers, in order to be consistent with the policy wording.</p>	<p><b>Comment is noted</b></p> <p>The wording of Policy TAI 12 referred to reflects the fact that the current site near Llandygai is designated for Gypsies only. This is consistent with the need to avoid conflicts between different lifestyles. It is believed that referring to it as a site for Gypsies and Travellers would create confusion.</p> <p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF 72 without any change.</p>
NF73	052	Comment	Welsh Government (Mark Newey) [1561]	<p>Paragraph 7.4.99:</p> <p>We do not object to the amendment made by the authority in relation to the number of pitches and caravans.</p>	Note the comment
NF74	053	Object	Welsh Government (Mark Newey) [1561]	<p><u>TAI13: Sites for Gypsies and Traveller Pitches</u></p> <p>The amendment to criterion 4 is supported and our objection is withdrawn. For additional clarity and to accord with national policy, criterion 4 should be more specific and amend 'high risk of flooding' to specify that no highly vulnerable development should be within zone C2.</p> <p>Criterion 6 partially satisfies our objection, however the wording should clearly state that the Welsh Government's Designing Gypsy and Traveller Sites guidance applies to Local Authority sites, with private sites being regulated under the Mobile Homes (Wales) Act 2013.</p> <p>The amendment to criterion 9 satisfies our concern.</p>	<p><b>Accepted</b></p> <p>It is agreed that changing the wording of criterion 4 and criterion 6 and adding a new criterion as suggested would improve the clarity of Policy.</p> <p>These are the changes:</p> <p><b>4.</b> That environmental factors including <del>high risk of flooding</del>, ground stability, contaminated land, and proximity to hazardous locations do not make the site inappropriate for residential development <b><u>unless mitigation is possible and proportionate;</u></b></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>5.The <b>standards and</b> design of the development <b><u>on a private site</u></b> demonstrates that due regard has been given to <b><u>the Mobile Homes (Wales) Act 2013 and that developments on sites by the Councils give appropriate consideration to</u></b> the Welsh Government Good Practice Guide in Designing Gypsy Traveller Sites;</p> <p><b><u>10. That a very vulnerable development is not located in a C2 flood risk zone,</u></b></p> <p><b>Recommendation</b> It is believed that the changes noted above to NF 74 are appropriate and if the Inspector agrees that change can be treated as a Matter Arising during the Examination.</p>
NF75	054	Support	Welsh Government (Mark Newey) [1561]	<p>Paragraph 7.4.104:</p> <p>The amendments to paragraphs 7.4.104 and 7.4.105 are supported and satisfy our objection.</p>	Note the supporting comment
NF78	025	Support	Steve Burgess Builders [2699] c/o Gwasanaethau Ymgynghorol Burum (Owain Wyn) [746]	Support the removal of the allocation	Note the supporting comment
NF78	036	Object	John Williams [2085] c/o Cadnant Planning (Rhys	We object to the Focussed Changes proposed under reference NF78, NF127, NF128 and NF129. NF78 is unjustified within the current consultation document. When considering the allocation of land	<p>Objection 036 &amp; 089</p> <p><b>Not accepted</b></p> <p>Focus Changes NF78 and NF127 required that land near Saron, Bethel (original deposit</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
			Davies) [483]	we consider the main differentiating considerations to be effect on the landscape character and appearance of the area, accessibility and connectivity and biodiversity.	allocation reference T58) be deleted due to its biodiversity value, its Wildlife Status as well as availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.
NF78	089	Object	Cyngor Cymuned Llanddeiniolen (Eleri Bean) [1531]	If the new report supports John Williams' request, then the Community Council will support John Williams' original request (T58) and object to both the alternative sites proposed.	<p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>Due to the scale of the development at the alternative housing allocations in Bethel (NF128 and NF129) there isn't a highways objection to the allocations.</p> <p>During to the planning application stage measures would need to be taken to ensure that the design and layout of the proposal are of the highest possible standard and that the visual impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF127 without any amendments.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
NF80	022	Comment	CPRW Gwynedd (Noel Davey) [1161]	In discussing protection of the natural environment we still think there is too little emphasis on the landscape relative to biodiversity. The introductory 'context' section of Chapter 7.5 has 7 paragraphs in which the word 'biodiversity' occurs 6 times and 'landscape' only once. Only the last two paragraphs refer, briefly, to the AONB and National Park. There should also be a reference here to SLAs. We think the balance is wrong.	Note the comment
NF80	074	Support	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	<p>Focused Change NF 80 states that the planning system plays an important role in meeting biodiversity objectives not only through promoting approaches to development that enhance or prevent loss of biodiversity but also through compensating for losses "where damage is unavoidable" (Section 7.5.1).</p> <p>Bourne Leisure recognises the need to protect, enhance and restore ecological networks as a matter of principle but also supports the Councils' recognition that development in sensitive locations may be necessary and can be acceptable. Compensation measures to address any adverse impacts can be appropriate in these circumstances, and this overall approach is therefore welcomed.</p>	Note the supporting comment
NF80	085	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support this focussed change for the reason given as justification by the JLDP Unit.	Note the supporting comment
NF81	086	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support - for the reason given as justification by the JLDP Unit.	Note the supporting comment
NF82	023	Comment	CPRW Gwynedd (Noel Davey) [1161]	We welcome a proposed new AMG policy which explicitly requires proposals within or affecting the setting of the AONB to have regard to the AONB Management Plan. We would still prefer this to be widened into a stronger policy comparable to GUDP	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				B8/B14 emphasising the statutory duty to protect nationally designated areas. We acknowledge the requirement not to duplicate national planning policy, but the change in emphasis in comparison with the GUDP gives a strong impression that the relative importance of the AONB is being downgraded in local planning policy.	
NF82	032	Support	National Resources Wales (Angharad Crump) [1521]	This new policy is welcomed which ensures that development within or affecting the setting and/or significant views into and out of the AONB have regard where appropriate to the AONB Management Plan and the further identification that the AONB Management Plans will carry significant weight in determining planning applications.	Note the supporting comment
NF82	084	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support this focussed change for the reason given by the JLDP Unit.	Note the supporting comment
NF83	075	Support	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	For proposals within Special Landscape Areas (which would include Greenacres Holiday Park), Focused Change NF 83 states that there is a need to ensure that there is no “significant adverse”, rather than any “detrimental” impact on the landscape. Within these areas, it is proposed that new development can “maintain, enhance or restore” the recognised character and qualities of the area (Policy AMG 1). Bourne Leisure welcomes this Focused Change in principle, as it recognises that some detrimental impact on the landscape may be unavoidable for acceptable development to proceed. It also recognises that it will not always be necessary or possible to “enhance or restore” the recognised character and qualities of Special Landscape Areas but provides the opportunity to “maintain” these important features.	Note the supporting comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
NF83	080	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	<p>We support the focussed changes however they should reflect the fact that the SLA in Anglesey has been changed without following due process.</p> <p>It is therefore an improvement to the policy AMG1. However this policy will not be given the full effect until it is based on the fact of having followed relevant legislation and policy.</p>	Note the supporting comment
NF84	076	Support	Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield & Partners (Helen Ashby-Ridgway) [2767]	<p>Focused Change NF 84 indicates that only those proposals that would have a “significant” adverse impact upon the specific landscape character of the area, as defined by the relevant Landscape Strategy, would be required to demonstrate how this character has influenced the details of the development through a landscape assessment. It also states that permission will be granted provided there is no “significant” adverse impact upon the unique landscape features and qualities of the area (Policy AMG 2).</p> <p>Bourne Leisure considers this approach to be appropriate, given that a level of adverse impact on the landscape may be unavoidable.</p>	Note the supporting comment
NF84	083	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support the focussed changes.	Note the supporting comment
NF85	082	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support the focussed changes.	Note the supporting comment
NF85	114	Comment	CPRW Gwynedd (Noel Davey) [1161]	We welcome a proposed new AMG policy which explicitly requires proposals within or affecting the setting of the AONB to have regard to the AONB Management Plan. We would still prefer this to be widened into a stronger policy comparable to GUDP B8/B14 emphasising the statutory duty to protect	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<p>nationally designated areas. We acknowledge the requirement not to duplicate national planning policy, but the change in emphasis in comparison with the GUDP gives a strong impression that the relative importance of the AONB is being downgraded in local planning policy.</p>	
NF86	077	Object	<p>Bourne Leisure Ltd [2768] c/o Nathaniel Lichfield &amp; Partners (Helen Ashby-Ridgway) [2767]</p>	<p>Bourne Leisure supports the Councils' approach in requiring the enhancement of biodiversity only where appropriate.</p> <p>However, the Company is concerned that the Policy does not include an option for mitigation or compensation measures to be provided as an option to address "significant harmful impacts" where they are unavoidable.</p> <p>Bourne Leisure therefore requests the following amendment: <b><u>"Avoiding significant harmful impacts through the sensitive location of development or providing appropriate mitigation or compensation measures where impact is unavoidable"</u></b> (Focused Change in bold, suggested amendments in bold and underlined).</p> <p>Bourne Leisure considers that the requirement to demonstrate that the "need" for a development outweighs the nature conservation value of a site of local biodiversity importance is unnecessarily onerous.</p> <p>The Company also notes that specific developments have the potential to generate net gain in biodiversity value through habitat creation.</p> <p>Bourne Leisure requests the following amendment: <b><u>"The <del>need for</del> benefits of the development outweighs the importance of the site for nature conservation; or appropriate mitigation or compensation measures are provided which</u></b></p>	<p><b>Not accepted</b></p> <p>It is considered that the policy should aim, in the first instance to protect sites in situ. Criterion 3 of NF86 covers the issue of appropriate mitigation or compensation measures. Furthermore it is not considered that the stipulation of proving the need for the developing in criterion 1 is not overly onerous. Replacing 'need' with 'benefits' as suggested would significantly alter the balance towards development as opposed to protecting the importance of the site for nature conservation.</p> <p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF86 without any amendments.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<b><u>address any negative impacts</u></b> ” (Focused Change in bold, suggested amendments in bold and underlined).	
NF86	081	Support	CPRW Ynys Môn (Mairede Thomas) [1441]	We support the focussed changes.	Note the supporting comment
NF91	112	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>To ensure that the definitions used in the Plan are consistent with those definitions used by Horizon in describing its Project, the following definitions Low Level Waste (LLW) and Very Low Level Waste (VLLW) should replace those included by Focused Change Ref: NF 91.</p> <p>Insert new definition as follows:</p> <p><b><u>“Low Level Waste (LLW) (including Very Low Level Waste (VLLW)) has a radioactive content not exceeding 4 GBq (Giga Becquerels) per tonne of alpha, or 12 GBq per tonne of beta / gamma activity. VLLW is a sub-category of LLW; VLLW which is defined as waste with maximum concentrations of 4 MBq (Mega Becquerels) per tonne of total activity. For waste containing tritium, the concentration limit for tritium is 40 MBq/te.”</u></b></p> <p><del>Low level waste (LLW) is radioactive waste having a radioactive content not exceeding 4 GBq/te (gigabecquerels per tonne) of alpha or 12 GBq/te of beta/gamma activity. LLW makes up more than 90% of the UK’s radioactive waste legacy by volume but contains less than 0.1% of the total radioactivity.</del></p> <p>-</p> <p><del>Very low level waste (VLLW) is a sub-category of LLW and is defined as either low volume VLLW or high volume VLLW. The principal difference between the</del></p>	<p><b>Partly agree</b></p> <p>The definition of Low and Very Low Radioactive Waste was taken from the ‘UK Strategy for the Management of Low and Very Low Radioactive Waste from the Nuclear Industry’ 2012. Since publishing the Focus Changes document the Strategy has been amended along with the definitions of LLW and VLLW. It is therefore necessary to amend the plan in accordance with the revised version of the Strategy (Feb 2016).</p> <p>The policy is relevant to other industries (apart from solely Wylfa Newydd), therefore it isn’t deemed necessary to conform with the definition of LLW and VLLW as set out in Horizon’s associated documents relating to Wylfa Newydd.</p> <p>The definition of LLW and VLLW could be amended to read as follows:-</p> <p><b><u>Low Level Waste (LLW)</u></b>  <b><u>Includes metals, soil, building rubble and organic materials, which arise principally as lightly contaminated miscellaneous waste. Metals are mostly in the form of redundant equipment. Organic materials are mainly in the form of paper towels, clothing and laboratory equipment that have been used in areas where radioactive materials are used – such as</u></b></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				<p>two definitions is the need for controls on the total volumes of high volume VLLW being deposited at any one particular landfill or other waste facilities.</p>	<p><u>hospitals, research establishments and industry. LLW contains radioactive materials other than those acceptable for disposal with municipal and general commercial or industrial waste. It is defined as:</u>  <u>“radioactive waste having a radioactive content not exceeding four gigabecquerels per tonne (GBq/te) of alpha or 12 GBq/te of beta/gamma radioactivity”.</u></p> <p><u>Very low level waste (VLLW)</u>  <u>Covers waste with very low concentrations of radioactivity. It arises from a variety of sources, including hospitals and the wider non-nuclear industry. Because VLLW contains little total radioactivity, it has been safely treated by various means, such as disposal with municipal and general commercial and industrial waste directly at landfill sites or indirectly after incineration. Its formal definition is:</u>  <u>(a) in the case of low volumes (‘dustbin loads’) of VLLW “Radioactive waste which can be safely disposed of to an unspecified destination with municipal, commercial or industrial waste (“dustbin” disposal), each 0.1m<sup>3</sup> of waste containing less than 400 kilobecquerels (kBq) of total activity or single items containing less than 40 kBq of total activity.</u>  <u>For wastes containing carbon-14 or hydrogen-3 (tritium):</u>  <u>(i) in each 0.1m<sup>3</sup>, the activity limit is 4,000 kBq for carbon- 14 and hydrogen-3 (tritium) taken together</u>  <u>(ii) for any single item, the activity limit is 400 kBq for carbon-14 and hydrogen-3 (tritium)</u></p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><u>taken together</u>  <u>Controls on disposal of this material, after removal from the premises where the wastes arose, are not necessary.</u>  <u>(b) in the case of high volumes of VLLW “Radioactive waste with maximum concentrations of four megabecquerels per tonne (MBq/te) of total activity which can be disposed of to specified landfill sites. For waste containing hydrogen-3 (tritium), the concentration limit for tritium is 40MBq/te. Controls on disposal of this material, after removal from the premises where the wastes arose, will be necessary in a manner specified by the environmental regulators”.</u></p> <p><b>Recommendation</b>  It is considered that the above change to the definition of LLW and VLLW is appropriate. If the Inspector agrees the change could be included as a Mater of Arising Change during examination.</p>
NF93	034	Support	Ellesmere Sand and Gravel (Stuart Lawrence) [2686]	Through the focused changes proposed to the deposit development plan at Policy MWYN2 – Sustainable Supply of Mineral Resource (NF 93) has been deleted due to duplication of policy. Ellesmere Sand & Gravel Company Limited support the focused change on the condition that Strategic Policy PS19: Minerals is amended to ensure a MINIMUM 7 year land bank of sand and gravel and 10 year land bank of crushed rock aggregate reserves are maintained for the duration of the plan. Where the land bank is not maintained reference should be made to national and regional need potentially outweighing impact to environmental designations.	Note the supporting comment

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NF97	113	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Horizon fully supports policy MWYN9: 'Borrow Pits' which can offer significant environmental benefits over mineral supply from existing reserves by reducing transport distances. However whilst contained paragraph 7.5.81 comprises supporting text only and not proposed to form part of planning policy, including additional tests to demonstrate the significant environmental benefits beyond those relating to reducing transport distances could act as a disincentive from utilising a borrow pit reserve.</p> <p>Delete the following text from supporting text 7.5.81</p> <p><del>There needs to be clear environmental benefits for the use of a borrow pit as opposed to supply from secondary or recycled aggregates, or from established mineral working sites identified in the development plan.</del></p>	<p><b>Not accepted</b></p> <p>The proposed Focus Change to Policy MWYN9 conforms to the guidance as set out in paragraph 14.8.23 of Planning Policy Wales (Edition 8, 2016).</p> <p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF87 without any amendments.</p>
NF117	003	Support	Cyngor Tref Blaenau Ffestiniog (Ann Coxon) [2940]	The Town Council supports the focussed change	Note the support
NF118	006	Object	Pwllheli Town Council (Robin Hughes) [1235]	Increase in traffic on narrow roads	<p><b>Accepted in part</b></p> <p>Due to the scale of possible development on the site the Transportation Service has confirmed that the site could accommodate up to 4 new dwelling.</p> <p>The site as shown in NF118 could accommodate more than 4 dwellings. It is therefore considered appropriate to reduce the size of the extension to the development boundary in accordance with Appendix A which will limit the possible number of dwelling on site to no more than 4 dwellings in accordance with the observation of</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>the Transportation Service.</p> <p><b>Recommendation</b> It is considered that the above change to the boundary as shown in Appendix A is appropriate. If the Inspector agrees the change could be included as a Matters Arising Change during the Examination.</p>
NF118	012	Comment	Dŵr Cymru Welsh Water (Dewi Griffiths) [2680]	The extended development boundary is crossed by water main. Should the area be developed in the future then full protection measures for the water main, usually in the form of an easement width or in some cases a diversion of the water main, would be required which may impact upon the density achievable on site.	Note the comment
NF119	001	Object	HN & V Williams [2145]	Due to the topography of the land it does not seem that there would be sufficient room to build a house within the new development boundary. I wish to suggest extending the development boundary by 42m from the road as shown on the attached map.	<p><b>Accepted</b> It is agreed that there is merit in amending the development boundary as shown in NF119 in order to ensure that sufficient space is included to resolve issues relating to the topography. It is therefore recommended that the site is amended in accordance with the Plan as shown in appendix B.</p> <p><b>Recommendation</b> It is considered that the change to the boundary as shown in Appendix A is appropriate. If the Inspector agrees the change could be included as a Matters Arising Change during the Examination.</p>
NF119	002	Object	Indeg Wyn [3394]	Allowing ribbon development like this will have a negative effect on the high quality greenfield site and will increase the traffic problems of the area.	<p><b>Not Accepted</b> Discussions with the Transportation Service</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>revealed that Penlon Llyn Street could accommodate additional housing.</p> <p>Due to the topography of the local landscape as well as development on the opposite side of the road it isn't considered that the proposal would result in a ribbon development.</p> <p><b>Recommendation</b> No amendments required to NF 119 in response to this objection.</p>
NF119	007	Object	Robin Hughes [1235]	Added pressure on narrow roads. Green land. Unsuitable site for buildings – cutting in and damaging landscape.	<p><b>Not Accepted</b></p> <p>Discussions with the Transportation Service revealed that Penlon Llyn Street could accommodate additional housing.</p> <p>Due to the topography of the local landscape along with the development on the opposite side of the road it isn't considered that the proposal would result in a ribbon development.</p> <p><b>Recommendation</b> No amendments required to NF 119 in response to this objection.</p>
NF127	009	Object	Cnllr Sion Jones [3172]	Deletion of allocation T58 (original) is questioned as the findings of the biodiversity report are incorrect. Another independent report has been commissioned which states that there are no biodiversity merits to the land.	<p><b>Not accepted</b></p> <p>Focus Change NF78 and NF127 required that land near Saron, Bethel (original deposit allocation reference T58) be deleted due to its biodiversity value, its Wildlife Site Status as well as availability of alternative sites. The objectors state that there is a low biodiversity value to the</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>site and have commissioned an Ecological Survey as a means of supporting the objection.</p> <p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF127 without any amendments.</p>
NF127	037	Object	John Williams [2085] c/o Cadnant Planning (Rhys Davies) [483]	We object to the Focussed Changes proposed under reference NF78, NF127, NF128 and NF129. NF78 is unjustified within the current consultation document. When considering the allocation of land we consider the main differentiating considerations to be effect on the landscape character and appearance of the area, accessibility and connectivity and biodiversity.	<p><b>Not accepted</b> Focus Change NF78 and NF127 required that land near Saron, Bethel (original deposit allocation reference T58) be deleted due to its biodiversity value, its Wildlife Status as well as availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p> <p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>Due to the scale of the development at the alternative housing allocations in Bethel (NF128 and NF129) there isn't a highways objection to the allocations.</p> <p>During to the planning application stage measures would need to be taken to ensure that the design and layout of the proposal are of the highest possible standard and that the visual impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF127 without any amendments.</p>
NF127	090	Object	Cyngor Cymuned Llanddeiniolen (Eleri Bean) [1531]	If the new report supports John Williams' request, then the Community Council will support John Williams' original request (T58) and object to both the alternative sites proposed.	<p><b>Not accepted</b></p> <p>Focus Change NF78 and NF127 required that land near Saron, Bethel (original deposit allocation reference T58) be deleted due to its biodiversity value, its Wildlife Status as well as availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p> <p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>Due to the scale of the development at the alternative housing allocations in Bethel (NF128 and NF129) there isn't a highways objection to the allocations.</p> <p>During to the planning application stage measures would need to be taken to ensure that the design and layout of the proposal are of the highest possible standard and that the visual impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF127 without any amendments.</p>
NF128	011	Object	Cnllr Sion Jones [3172]	<p>Application for a single dwelling on the site has previously been rejected as is would result in development in open countryside. Access to the main road is very busy. 28 dwellings on the site is a large amount, it is considered that there are more suitable sites available.</p>	<p><b>Not accepted</b> Due to the scale of the development the Council's Transportation Service are satisfied that the local highway network could accommodate the additional housing growth. During the planning application process measures would need to be taken to ensure that the design and layout of the proposal are of the highest possible standard and that the visual</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF128 without any amendments.</p>
NF128	013	Comment	Dŵr Cymru Welsh Water (Dewi Griffiths) [2680]	<p>A water supply can be provided to serve this site. 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.</p> <p>The proposed growth being promoted for this settlement would require improvement at the Treborth wastewater treatment works (WwTW) which would need to be funded through the Asset Management Plan or potentially earlier through developer contributions.</p>	Note the comment
NF128	026	Object	Steve Burgess Builders [2699] c/o Gwasanaeth-au Ymgynghorol Burum (Owain Wyn) [746]	The land has not been proposed as a candidate site in the first instance and it was not included as an extension to the development boundary of Bethel or designated for housing in the Deposit Plan. There is another very similar site nearby and on the same side of the road (SP857) which has been refused due to being an obstruction judged to be "in open countryside" and "contrary to national planning policy and the JLDP Strategy".	<p><b>Not accepted</b></p> <p>Following an objection received during the public consultation period of the deposit plan, the Council via Focus Change NF78 and NF127 removed the original housing allocation at Saron Bethel, due to its biodiversity value.</p> <p>In order to satisfy the proposed housing growth for Bethel during the plan period it was necessary to assess other sites which were considered appropriate for housing. Consideration was given to the submitted Candidate Sites along with other sites considered to be appropriate. After considering various factors including visual impact and</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>accessibility the two alternative housing allocations (NF128 and NF129) were considered to be the most appropriate housing allocations.</p> <p>No robust evidence has been presented which suggests that these sites shouldn't be allocated for housing purposes.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF128 without any amendments.</p>
NF128	038	Object	John Williams [2085] c/o Cadnant Planning (Rhys Davies) [483]	We object to the Focussed Changes proposed under reference NF78, NF127, NF128 and NF129. NF78 is unjustified within the current consultation document. When considering the allocation of land we consider the main differentiating considerations to be effect on the landscape character and appearance of the area, accessibility and connectivity and biodiversity.	<p><b>Not accepted</b> Following Focus Change NF78 and NF127 Land near Saron, Bethel (original deposit allocation reference T58) was deleted due to its biodiversity value, Wildlife Site status and availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p>
NF128	091	Object	Eleri Bean Cyngor Cymuned Llanddeiniolen (Eleri Bean) [1531]	If the new report supports John Williams' request, then the Community Council will support John Williams' original request (T58) and object to both the alternative sites proposed.	<p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>Due to the scale of the development at the</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>alternative housing allocations in Bethel (NF128 and NF129) there isn't a highways objection to the allocations.</p> <p>During to the planning application stage measures would need to be taken to ensure that the design and layout of the proposal are of the highest possible standard and that the visual impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF128 without any changes.</p>
NF129	004	Object	WH & JM Vize [3396]	T58 - what are the biodiversity matters that have led to this site's recommended deletion. N129 contains more wildlife, is used by local people and planning consent has been rejected several times. The site also has accessibility issues.	<p><b>Not accepted</b></p> <p>Following Focus Change NF78 and NF127 Land near Saron, Bethel (original deposit allocation reference T58) was deleted due to its biodiversity value, Wildlife Site Status and availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p> <p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>The proposed housing allocation NF129 (land opposite Rhoslan Estate), isn't a designated Candidate Wildlife Site and doesn't have a recognised biodiversity value.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF128 without any changes.</p>
NF129	005	Object	HB Owen & Mrs SE Owen [3395]	<p>Following the rejection of T58 on biodiversity grounds, NF129 also has biodiversity issues as there is much wildlife there. Also as many outstanding issues following several previous planning applications that have never been resolved.</p>	<p><b>Not accepted</b></p> <p>Following Focus Change NF78 and NF127 Land near Saron, Bethel (original deposit allocation reference T58) was deleted due to its biodiversity value, Wildlife Site status, and availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p> <p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>Site.</p> <p>The proposed housing allocation NF129 (land opposite Rhoslan Estate), isn't a designated Candidate Wildlife Site and doesn't have a recognised biodiversity value.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF129 without any changes.</p>
NF129	008	Support	Samuel Haydn Davies [3160]	Support NF129. Land is available for immediate development and includes the necessary infrastructure along with access. Additional land would be available if required.	Note the supporting comment.
NF129	010	Object	Cnllr Sion Jones [3172]	Major local opposition to the proposal which has been previously refused by Gwynedd Council along with the Welsh Government. On site problems relating to sewerage, access and the loss of good agricultural land.	<p><b>Not accepted</b></p> <p>Welsh Water hasn't submitted an objection to Focus Change NF129. A comment was received stating that a water supply can be provided to the site and that an off-site sewer would be required to connect to the public sewer (see comment number 014 below). Welsh Water's comment regarding the WWTW would also apply to the allocation included in the Deposit Plan (T58). The Councils will prepare an additional Topic Paper that will include a statement of common ground with Welsh Water to demonstrate the site's deliverability.</p> <p>The site isn't of high biodiversity or agricultural value. Previous planning applications have been refused due to its location outside the development boundary in the adopted Gwynedd Unitary Development Plan.</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p><b>Recommendation</b></p> <p>That the Planning Inspector includes NF129 without any changes.</p>
NF129	014	Comment	Dŵr Cymru Welsh Water (Dewi Griffiths) [2680]	<p>A water supply can be provided to serve this site. 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.</p> <p>The proposed growth being promoted for this settlement would require improvement at the Treborth wastewater treatment works (WwTW) which would need to be funded through the Asset Management Plan or potentially earlier through developer contributions.</p>	<p><b>Note the comment</b></p> <p>The Councils have recorded this requirement in Topic Paper 19 (PT.032) and also intend to publish an additional Topic Paper Infrastructure and Deliverability to provide further clarity – see response to request for information from the Inspector (DA.03A &amp; B).</p>
NF129	027	Object	Steve Burgess Builders [2699] c/o Gwasanaeth-au Ymgynghorol Burum (Owain Wyn) [746]	<p>The designation proposed is part of a candidate site submitted in the register by the closing date in April 2014. The Council's assessment considers that the site is unacceptable as there are sites available with better access. The Local Member is of the opinion that "it would be obtrusive in open countryside but suggests that the front of the site would be acceptable". A planning appeal on the site was refused.</p>	<p><b>Not accepted</b></p> <p>Following an objection received during the public consultation period of the deposit plan, the Council via Focus Change NF78 and NF127 removed the original housing allocation at Saron Bethel due to its biodiversity value.</p> <p>In order to satisfy the proposed housing growth for Bethel during the plan period it was necessary to assess other sites which were considered appropriate for housing. Consideration was given to the submitted Candidate Sites along with other sites considered to be appropriate. After considering various factors including visual impact and accessibility the two alternative housing allocations (NF128 and NF129) were considered</p>

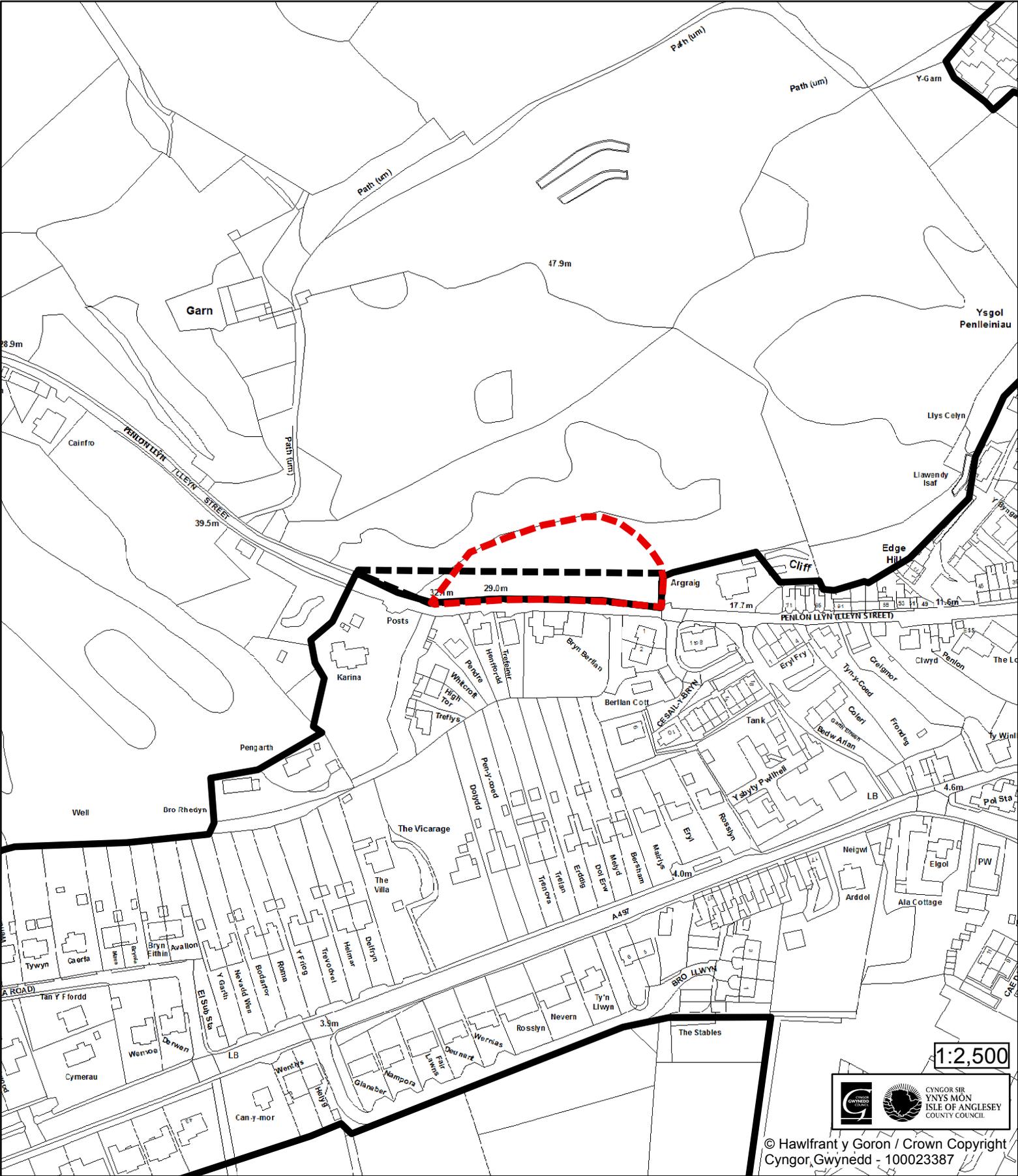
Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>to be the most appropriate housing allocations.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF129 without any amendments.</p>
NF129	039	Object	John Williams [2085] c/o Cadnant Planning (Rhys Davies) [483]	We object to the Focussed Changes proposed under reference NF78, NF127, NF128 and NF129. NF78 is unjustified within the current consultation document. When considering the allocation of land we consider the main differentiating considerations to be effect on the landscape character and appearance of the area, accessibility and connectivity and biodiversity.	<p><b>Not accepted</b> Following Focus Change NF78 and NF127 Land near Saron, Bethel (original deposit allocation reference T58) was deleted due to its biodiversity value, Wildlife Site Status and availability of alternative sites. The objectors state that there is a low biodiversity value to the site and have commissioned an Ecological Survey as a means of supporting the objection.</p>
NF129	092	Object	Cyngor Cymuned Llanddeiniolen (Eleri Bean) [1531]	If the new report supports John Williams' request, then the Community Council will support John Williams' original request (T58) and object to both the alternative sites proposed.	<p>The initial assessment, and subsequent site surveys undertaken on behalf of the Council in 2012 and 2015 identified the site as one that meets the criteria for designation as a Wildlife Site. The work undertaken to date by Endoscope Ltd has not provided robust evidence to remove the candidate wildlife site status. Therefore, the site continues to merit designation as a Wildlife Site.</p> <p>Due to the scale of the development at the alternative housing allocations in Bethel (NF128 and NF129) there isn't a highways objection to the allocations.</p> <p>During to the planning application stage measures would need to be taken to ensure that</p>

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
					<p>the design and layout of the proposal are of the highest possible standard and that the visual impact of the development is mitigated.</p> <p><b>Recommendation</b> That the Planning Inspector includes NF129 without any changes.</p>
NF134	126	Object	Horizon Nuclear Power (Daniel Harper) [2919]	<p>Focused Change Ref: NF 135 also seeks the deletion of the "A5025 Improvement Areas" from the Proposals map as shown on Proposals Map 1 – Isle of Anglesey. <b>Horizon considers that that the "A5025 Improvement Areas" should continue to be shown on the Proposals Map as it was in the Deposit Plan.</b> This approach is consistent with the emerging proposals being brought forward in collaboration with Isle of Anglesey County Council.</p>	<p><b>Not accepted</b> See response to comment 125 above</p> <p><b>Recommendation</b> That the Inspector includes NF134 without any amendments</p>
NF135	015	Comment	Dŵr Cymru Welsh Water (Dewi Griffiths) [2680]	There are water mains crossing the identified areas and protection measures in the form of easement widths or a diversion of the water mains may be needed for development in close proximity.	Note the comment
NF135	035	Support	Ellesmere Sand and Gravel (Stuart Lawrence) [2686]	Through the focused changes proposed to the deposit development plan Proposals Map 2 has been amended (NF 135) to include land at Bodychain Farm as a preferred areas of search for sand and gravel. Ellesmere Sand & Gravel Company Limited support the focused change to ensure a MINIMUM 7 year land bank of sand and gravel reserves are maintained for the duration of the plan.	Note the supporting comment
NF136	016	Comment	Dŵr Cymru Welsh Water (Dewi Griffiths) [2680]	Nanhoron - there are water mains crossing the mineral buffer zone and protection measures i the form of easement widths or diversion of the water main may be needed for development in close	Note the comment

Focussed Change	Rep ID	Type	Name & Person ID	Summary of Representation	Response
				proximity.	



# Cynllun Datblygu Lleol ar y Cyd / Joint Local Development Plan Newidiadau â Ffocws / Focussed Changes



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# B

**Cyf / Ref:** NF119  
**Rhan / Section:** Map 5 - Pwllheli  
**Disgrifiad / Description:** Ymestyn y Newid â Ffocws /  
 Extend the Focussed Change