



**GWYNEDD UNITARY DEVELOPMENT PLAN  
2001 – 2016**

**PUBLIC INQUIRY**

**INSPECTOR'S REPORT**

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The translation of the Inspector's report into the Welsh language was commissioned by Gwynedd Council. As such, any issues relating to the content of this version and any apparent differences between it and the English version, which is the original, should be addressed to them via the usual channels.

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## **OBJECTIONS TO PART 1**

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA1; NA2; NA3; NA4; NA5; NA6; NA7; NA8; NA9; NA393

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/4	Sustainable Gwynedd Gynladwy		6
B/866/3	Snowdonia National Park Authority		532
B/866/1	Snowdonia National Park Authority		409

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/4	Welsh Assembly Government		532
B/734/5	Welsh Assembly Government		532
B/734/8	Welsh Assembly Government		532
B/734/7	Welsh Assembly Government		532
B/734/6	Welsh Assembly Government		532
B/734/9	Welsh Assembly Government		532

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/5	Sustainable Gwynedd Gynladwy		
B/734/10	Welsh Assembly Government		
B/734/3	Welsh Assembly Government		
B/773/1	Chris Wynne (North Wales Wildlife Trust)		



<b>B/734/38</b>	<b>Welsh Assembly Government</b>		
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### Objections to Pre-Inquiry Proposed Changes

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/2205</b>	<b>Welsh Assembly Government</b>		<b>532</b>
<b>b/734/2208</b>	<b>Welsh Assembly Government</b>		<b>532</b>

### Note

- Objection B/866/1 is responded to in LPA proof 650, not 409.

### Main Issues

- The start of the plan period.
- The policy context.
- The relationship between the area of the plan and that of the Snowdonia National Park.
- The relationship between economic growth and environmental impact.
- The role of Sustainability Appraisal and Strategic Environmental Assessment.

### Inspector's Considerations and Conclusions

#### *The start of the plan period*

1. An objector notes that the DD text presents apparently inconsistent information upon the start of the plan period. Paragraph 1.1.14 informs that the base date for the Gwynedd UDP will be April 2001, but paragraph 1.1.32 informs that the UDP will be operative from the date of adoption. The LPA agrees that the plan should present unambiguous information upon this important aspect. It proposes, via NA 2 and NA 6, to delete paragraphs 1.1.14 and 1.1.32. Proposed Pre-inquiry Change NA 1 would amend the text of paragraph 1.1.11 to confirm that the Gwynedd UDP will establish a policy framework and make provision for development needs for the period from 2001 to 2016. I conclude that this provides the necessary clarity.

#### *The policy context*

2. The DD, in paragraph 1.1.24, refers to several sources of guidance in respect of sustainable development. One of these is the document 'Better Wales'. An objector notes that this has now been replaced by 'Wales: A Better Country'. The LPA agrees that the most up-to-date reference should be made. It proposes to achieve this via NA 3. In formulating this, although it inserted the reference to the most recent document, it omitted to delete the earlier one. I conclude that this must be done before the plan is adopted.

3. DD paragraph 1.1.30 informs that the Welsh Assembly Government (WAG) is committed to the preparation of a National Spatial Planning Framework for Wales. That body, itself, expresses concern that this wording could cause confusion

with the system of strategic planning documents to be prepared in England. It advocates, instead, a reference to the commitment of that body to the preparation of a Wales Spatial Plan. The objector argues, furthermore, that the final sentence of DD paragraph 1.1.30 wrongly identifies the North Wales Regional Planning Guidance as WAG Guidance on Spatial Planning. The LPA agrees and seeks to secure the necessary changes via NA 5. That proposed Pre-inquiry Change deletes DD paragraph 1.1.30 in its entirety but, due to an oversight, does not put revised text in its place within the English version of the plan. The LPA proposes to remedy this situation via Further Proposed Change NAP 117 which would make the necessary references to the Wales Spatial Plan. I conclude that this would secure an accurate and up-to-date statement of the planning policy context. However, because this Further Proposed Change has not yet been the subject of public consultation a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.

4. DD paragraph 1.1.26 refers to documents prepared by WAG which provide guidance on the UDP process. An objector argues that, in addition, reference should be made to Minerals Planning Policy Wales 2000. The LPA agrees and, via NA 4, proposes to insert this reference. I conclude that this will secure a comprehensive list of relevant documents. It will also, where relevant, replace the word 'guidance' with 'policy' and thereby, more accurately reflect the status of the sources referred to. NA 8 and NA 9 would serve the same purpose elsewhere in the text.

*The relationship between the area of the plan and that of the Snowdonia National Park*

5. An objector expresses concern that the DD does not clearly express the distinction between the area of the UDP and that of the Snowdonia National Park for which the local planning authority is the Snowdonia National Park Authority. In particular it is argued that the use of Dependency Catchment Areas (DCAs) may contribute to confusion as to the spatial coverage of UDP policies.

6. The boundaries between the two local planning authorities are administrative ones. It is clear that they do not encapsulate functional areas with a high degree of self-containment in economic, social and travel-to-work terms. For this reason the LPA has defined DCAs as the basis for several policy topics. I deal with the merits of these in the section of this report which relates to policy CH1.

7. The introduction to the DD, in paragraphs 1.1.4 and 1.1.5, clearly presents the distinction between the two local planning authorities which operate within Gwynedd and the relationship of these to the preparation of development plans. Paragraphs 1.3.12 and 1.3.17 do, furthermore, introduce the concept of DCAs and emphasise that they are based on the pattern of use made of the land resource by communities both within and beyond the LPA area. The DD explicitly states that the DCAs include areas of Gwynedd which lie within the boundaries of the Snowdonia National Park, but that the Gwynedd UDP does not guide development in those areas. DD Map 1 does clearly show the part of Gwynedd which lies within the National Park. I note that DD Map 2 does not show the relationship between the DCAs and the National Park Area but this would be remedied by the acceptance of NA 393. I conclude that, subject to this proposed Pre-inquiry Change, the DD does clearly express the relationship between the UDP area and that of the Snowdonia National Park Authority.

*The relationship between economic growth and environmental impact*

8. An objector recognises that the DD adopts a precautionary approach to decision making in respect of the development and use of land as an element of its overall objective to achieve a sustainable pattern of settlement. He expresses concern, however, that the plan fails to show how economic growth can be pursued while, at the same time, the 'ecological footprint' of the plan area can be reduced.

9. PPW (paragraph 2.1.4) advises that working towards sustainable development means pursuing four objectives at the same time. One of these is the effective protection of the environment. Another is the maintenance of high and stable levels of economic growth and employment. PPW (paragraphs 7.1.2 to 7.1.6) confirms that WAG is committed to, among other things, securing economic progress for Wales. The number and quality of jobs must be increased. Economic inactivity must be reduced. Economic performance must be boosted in order that Welsh gross domestic product per capita may be raised. Wealth creation and environmental quality are seen as increasingly inter-connected. Businesses should be helped to maximise their competitiveness. All communities need new employment opportunities. LPAs should formulate and implement land use planning policies for, among other things, wealth creating development.

10. It is clear, therefore, that the decisions made by the LPA must have regard not only to the environmental matters reflected in such measures as the ecological footprint, but also to the promotion of economic growth. The measures available to the local planning authority in seeking to reconcile these factors are limited to the development and use of land. The DD makes a major contribution to this process by seeking to concentrate most development in the larger settlements, thus maximising the scope for residents to gain access to a wide range of employment, retail, health, education and leisure opportunities via sustainable transport modes.

11. The DD, furthermore, incorporates detailed policies which assess the accessibility of sites in terms of the public transport network (CH30), promote good links for walkers to the bus/rail network (CH27), promote the use of cycles as a means of travelling to work (CH29), seek to facilitate small scale employment opportunities close to homes, i.e. in or near to settlements (D7) and seek to facilitate home based businesses (D11). I conclude that both the overall strategy and the detailed policies and proposals of the UDP have been consciously formulated to maximise the extent to which both economic and environmental objectives are achieved to the extent that is possible via decision making in respect of the development and use of land.

*The role of Sustainability Appraisal and Strategic Environmental Assessment*

12. An objector argues that the UDP should have been the subject of an Environmental Appraisal from the earliest stages of its preparation. The LPA agrees that a sustainability appraisal is an important element in the preparation of this plan. Such an independent appraisal was commissioned as the first significant step in the plan preparation process. This approach has contributed to the preparation of the Pre-deposit Consultation Draft of the plan and of the DD. The DD itself has been the subject of both Sustainability Appraisal and Strategic Environmental Assessment.

13. The LPA agrees that the DD does not present sufficient information upon this aspect of plan preparation. It proposes to remedy this via NA 7. Unfortunately the text proposed by NA 7 is subject to grammatical errors which render its meaning unclear. I conclude that it is necessary to present in the UDP a full account of the Sustainability Appraisal/Strategic Environmental Assessment process and its application to the preparation of that document. If this changes materially from that presented at Pre-inquiry Proposed Change stage it should be the subject of further consultation via the modification process.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0001) that the DD be modified by the acceptance of NA 1;**

**(REC.0002) that the DD be modified by the acceptance of NA 2;**

**(REC.0003) that the DD be modified by the acceptance of NA 3, subject to the deletion of the reference to the document 'Better Wales';**

**(REC.0004) that the DD be modified by the acceptance of NA 4;**

**(REC.0005) that the DD be modified by the acceptance of NA 5;**

**(REC.0006) that the DD be modified by the acceptance of NA 6;**

**(REC.0007) that the DD be modified by the acceptance of NA 8;**

**(REC.0008) that the DD be modified by the acceptance of NA 9;**

**(REC.0009) that the DD be modified by the acceptance of NA 393;**

**(REC.0010) that the DD be modified by the incorporation of an up-to-date account of the role of the Sustainability Appraisal/Strategic Environmental Assessment process in the preparation of the UDP;**

**(REC.0011) that no other modification be made to the DD in response to these objections.**

## GWYNEDD 2004

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA10; NA11

This Section is subject to Further Proposed Changes Nos: NAP2

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/6	Sustainable Gwynedd Gynladwy		16
B/790/1	Gwynedd Archaeological Trust		528
B/760/58	CCW		528
B/760/59	CCW		528

### Main Issues

- The concept of the ecological footprint.
- The references made to the bio-diversity of the plan area.
- The references made to the historic resources of the plan area.
- The references made to the rural economy.

### Inspector's Considerations and Conclusions

#### *The concept of the ecological footprint*

1. The DD, in section 1.2, as a context for the plan seeks to present a brief pen picture of the condition of Gwynedd in 2004. In paragraph 1.2.9 it expresses the view that, on the whole, environmental pollution is not a major problem in Gwynedd. An objector is concerned that this might well foster complacency. He refers to the concept of the ecological footprint and argues that, when calculated per vehicle or per standard area of built environment, the situation in Gwynedd may present a cause for concern.

2. The LPA refers to the report 'Reducing the Ecological Footprint of Gwynedd (2005)'. It agrees that the concept of the ecological footprint is the best available method to measure the effect of the lifestyle of Gwynedd residents on the local and global environment. For this reason it proposes, via NAP 2, to change the text of paragraph 1.2.9 to refer to this concept and to express its present conclusion that, at current levels of consumption, the plan area is unsustainable. Because this Further Proposed Change has not been the subject of public consultation a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so via the modification procedure.

*The references made to the bio-diversity assets of the plan area*

3. The objector refers to DD paragraphs 1.2.5 and 1.2.6 which make brief reference to the bio-diversity assets of the plan area. He argues that by now the quoted figures will have changed. This is to be expected because the purpose of the text is to present a snapshot of the situation at the date of publication of the DD. The LPA proposes NA 10 which would clarify this point. This would have the merit of confirming the data as base-line figures from which subsequent change can be measured.

*The references made to the historic resources of the plan area*

4. The DD, in paragraph 1.2.7, presents a brief summary of the number of listed buildings, conservation areas and scheduled ancient monuments in the plan area. It notes that a high percentage of Gwynedd has been designated as a Landscape of Special Historic Interest. An objector expresses concern that the paragraph does not refer to the parks and gardens which are included in the Cadw Register of Landscapes, Parks and Gardens, Part 1. This paragraph is not intended to present a comprehensive account of all the historic assets of the plan. Appendix 1 of the plan, as subject to NA 232, lists the historic parks, gardens and landscapes on the Cadw Register. The objector argues that reference should be made to the number of non-scheduled archaeological sites but the rate of change in this would render that information out-of-date at an early stage in a document which is intended to provide guidance over the period to 2016. The objector emphasises that the Landscape of Special Historic Interest should not be referred to as a 'designation'. The LPA agrees and, via NA 11, proposes to delete that term. I conclude that its replacement with a reference to the 'registration' of Landscapes of Special Historic Interest will improve the accuracy of the paragraph.

*The references made to the rural economy*

5. DD paragraph 1.2.28 refers to recent problems which have affected the agricultural industry in the UK as a whole. It concludes that these have had a negative impact on the indigenous rural communities of the plan area. An objector expresses the view that the Common Agricultural Policy of the European Union is an additional factor to which reference should be made.

6. This paragraph is intended to do nothing more than draw attention to the fact that the rural economy of the plan area is, at present, subject to adverse influences, in order to set the context for the later presentation of policies which impinge on this and the related rural landscape and settlement pattern. Because the scope of the plan is limited to prescription in respect of the development and use of land, there is no merit in expanding this introductory text to present an appraisal of the impact of the Common Agricultural Policy.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0012) that the DD be modified by the acceptance of NA 10;**

**(REC.0013) that the DD be modified by the acceptance of NA 11;**

**(REC.0014) that no other modification be made to the DD in response to these objections.**

## THE PLAN'S STRATEGY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA12; NA13; NA14; NA15; NA16; NA17; NA18; NA19; NA20; NA21

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
A/108/1	Joe Stoner		529
B/954/1	Bourne Leisure Ltd	Margaret Baddley	529
B/923/14	Tesco Stores Limited	Paul Lester	242
B/923/14	Tesco Stores Limited	Paul Lester	242
B/923/5	Tesco Stores Limited	Paul Lester	529
B/923/1	Tesco Stores Limited	Paul Lester	221
B/756/21	Environment Watch Wales and the Borders		113
B/756/20	Environment Watch Wales and the Borders		113
B/756/22	Environment Watch Wales and the Borders		113
B/866/4	Snowdonia National Park		529
B/866/5	Snowdonia National Park		244
B/867/4	House Builders Federation		RTS Housing Requirement and supply
B/720/3	Snowdonia Society		217
B/756/19	Environment Watch Wales and the Borders		113
B/983/1	Headland Promotions	Emery Planning Partnership	243
B/1032/3	Mrs C. Jones	John Alun Jones	243



**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/28	CPRW		220
B/870/9	Sustainable Gwynedd Gynladwy		218
B/867/5	House Builders Federation		222
B/734/15	Welsh Assembly Government		241
B/734/13	Welsh Assembly Government		221
B/734/12	Welsh Assembly Government		219
B/734/11	Welsh Assembly Government		210

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/14	Welsh Assembly Government		
B/734/190	Welsh Assembly Government		
B/734/191	Welsh Assembly Government		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/923/3	Tesco Stores Ltd	Paul Lester	
B/923/4	Tesco Stores Ltd	Paul Lester	
B/870/7	Sustainable Gwynedd Gynladwy		
B/870/8	Sustainable Gwynedd Gynladwy		
B/870/10	Sustainable Gwynedd Gynladwy		
B/322/1	Morbaine Limited		

## Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2209	Welsh Assembly Government		529
B/734/2206	Welsh Assembly Government		529
B/923/2016	Tesco Stores Ltd	Paul Lester (DPP)	221

### Note

- Objection B/734/2206 is dealt with in the section of this report which relates to Policy C21.
- Objections B/756/19, B/756/20, B7/56/21 and B/756/22 are responded to in LPA Proof 165, not 113.

### Main Issues

- The concept of Dependency Catchment Areas.
- The implications of the Dependency Catchment Area methodology for the area of the Snowdonia National Park.
- The classification of settlements.
- The functions of the plan.
- The importance of Welsh language and culture.
- The proposed restriction of housing development in particular settlements;
- The definition of sustainable communities.
- The role of retail development in maintaining the Sub-regional Centre.
- The emphasis given to the re-use of land and buildings.
- The basis for the phasing of the development of allocated housing sites.
- The promotion of economic growth.
- The merits of farm diversification.
- The concept of integrated transport.
- The role of tourism in the local economy.
- The need for continuing liaison between the two local planning authorities of Gwynedd.
- The procedures for public consultation.
- Grammatical matters.

### Inspector's Considerations and Conclusions

#### *The concept of Dependency Catchment Areas*

1. The strategy of the Deposit Draft (DD) plan is intended to achieve its stated aim which is to provide a framework for creating and maintaining sustainable communities. This concept of sustainable communities is intended to be a central element of the UDP which will permeate all of its policies. The measures required to achieve the stated aim are expressed as objectives. These are the effective protection of the environment; careful use of natural resources; ensuring social progress which reflects the needs of all, and the promotion of appropriate economic growth and growth in employment.

2. The LPA considers that it is necessary for the UDP to serve two important functions. The first of these is to guide and direct development within the plan area. The second is to address issues and conditions that at present affect particular parts of that area. Both of these approaches are, in the view of the LPA, necessary if its stated aim is to be achieved. The scale of development within settlements will be determined in accordance with the principles of sustainable development.

3. The spatial strategy for guiding development and addressing issues and conditions already in existence is proposed to be applied via eight Dependency Catchment Areas (DCAs). These are intended to be based on the pattern of use made of the various service centres and the transport network. Because development pressure, the availability of suitable sites, environmental quality and sensitivity and the quality of infrastructure vary between the DCAs this is reflected in the strategy which is proposed to be applied to each of them.

4. An objector argues that the concept of DCAs is faulty because it does not secure a technically rigorous basis for the distribution of housing development between the major component parts of the UDP area. He considers that its effect on the subsequent distribution of house building between settlements promotes an unsustainable pattern of settlement.

5. The LPA at the Round Table Session (RTS) in relation to the overall requirement for and supply of land for housing confirmed that the principal use of the DCAs has been in relation to the distribution of housing land allocations, although regard was also had to it in formulating proposals for certain employment sites. It clarified that the notes to UDP table 3 describe a steering exercise which took the overall estimate of the capacity of housing land allocations needed in the plan area and distributed it between the DCAs. This steering exercise was undertaken by the UDP steering group of elected members. Various levels and patterns of steerage were postulated and political judgements were made on the basis of the particular population profiles of each DCA together with the effect of different levels of new house building upon them. Having exercised political judgement as to the distribution of new house building between the DCAs, the resultant numbers of new dwellings were then assigned to particular sites within them, having regard to the defined hierarchy of settlements in each DCA, the greater number going to the larger places.

6. The assignment of settlements to the various tiers of the hierarchy was based on the range of functions available in each one. The greater the range of functions the greater is the scope for residents to satisfy their needs within them and, therefore, the greater the potential of development there to contribute to a sustainable pattern of settlement. The assignment of dwelling numbers to particular settlements had to reflect the actual scope of these to accommodate additional houses. Some settlements were so severely constrained that the assignment of dwellings had to be diverted to nearby settlements in a lower tier within the same DCA.

7. It is clear from the explanation given by the LPA at the RTS that the distribution of dwelling units between the DCAs was based on judgement rather than on a rigorous technical exercise. Furthermore, the whole concept of DCAs is based on the premise that there are effective boundaries which condition the

pattern of life of the population of the UDP area, imposing real constraints on where they can live, work and meet all their other needs. The basis for the definition of DCAs was described by the LPA in general terms but no technical basis was presented to demonstrate the degree of interaction between the various settlements of the plan area. In my view the concept cannot be sustained when consideration is given to the actual definition of the DCAs in the vicinity of the two principal settlements of Bangor and Caernarfon. These are proposed to lie in separate DCAs but are separated by only some 10km and are connected by frequent high quality bus routes over terrain which contains not the slightest physical constraint to movement. The journey between them is a matter of only minutes. Rather than operating as separate centres they will interact in terms of housing and employment and also in terms of retail and leisure functions. Similarly Pwllheli is proposed to be in a separate DCA from Porthmadog and Criccieth, but the distance between these settlements is so short and the travel time by good public transport services is, in the absence of any physical barriers to movement, very short.

8. For these reasons I conclude that the definition of DCA boundaries is not based on a sound appraisal of the characteristics of the UDP area. The consequences of this are of particular concern when consideration is given to the way in which the concept has been used in practice. Having identified, on a rather obscure basis, a quantity of house building to be assigned to each DCA, the LPA has sought to accommodate the majority of it, as far as possible, in the largest settlements in each one. To the extent that such an assignment is constrained by lack of suitable land the LPA has sought to divert the allocations of housing land to the next settlement(s) below it in the hierarchy within the same DCA, leading to it proposing substantial housing allocations in comparatively small settlements simply because they are the nearest ones to the constrained larger settlement and lie within the same DCA.

9. This approach, which regards the boundaries of the DCAs as impermeable barriers across which quantities of housing allocations cannot be moved, leads to a proposed pattern of settlement which is directly contrary to that set out in Planning Policy Wales (PPW) (paragraph 9.3.2) in that it would result in the significant incremental expansion of housing in villages and small towns in circumstances where it would result in a significant expansion of travel demand to urban centres and where travel needs are unlikely to be well served by public transport. Because it would promote an unsustainable distribution of housing allocations, the concept of DCAs as proposed to be applied to the UDP area would have an outcome which would be inconsistent with the stated aim of the UDP itself.

10. Because it has not been clearly demonstrated that the DCAs, as proposed, reflect the ways in which the people of Gwynedd actually use the plan area to satisfy their needs, and because its use in distributing housing land allocations has such an unsustainable outcome, I conclude that it is a concept that should not be pursued as the basis of the housing land allocation process. Instead the distribution of housing land allocations should be based on the defined settlement hierarchy of the Plan area as a whole with the greatest quantity of allocated housing land being directed to the Sub-regional Centre and proportionately less to each of the lower tiers.

*The implications of the Dependency Catchment Area methodology for the area of the Snowdonia National Park*

11. DD paragraph 1.13.12 explains that, as an aspect of the plan's strategy, eight Dependency Catchment Areas have been established to guide development and help address issues and conditions already in existence. These are based on the pattern of the community's use of the service centres and the transport networks within Gwynedd as a whole and the links with the rest of Wales and the UK. These DCAs are shown on the key diagram.

12. An objector argues that it is not the role of the Gwynedd UDP to define such boundaries in the part of Gwynedd which lies within the area of the Snowdonia National Park and which is, therefore, the subject of the Eryri Local Plan, particularly if these are used to help define general land use planning objectives in areas of Gwynedd which lie outside the Gwynedd UDP area. This is considered to be of particular relevance to the distribution of the County's housing land requirement among the eight DCAs.

13. Although the DCAs are defined on the basis of the use by communities of service centres and the transport network, they are used in the DD principally as the basis for the distribution of the various elements of the housing land resource. UDP table 3 makes clear that the calculation of the amount of land to be allocated for housing in the UDP area starts with the forecast of the total of new dwellings required in the period between 2001 and 2016 for Gwynedd as a whole, including the area of the Eryri Local Plan. This is based on a forecast of new households forming over that period. As was made clear at the Round Table Session which examined the requirement for and supply of land for housing, no reliable forecasts were available at a scale smaller than Gwynedd as a whole. It was, therefore, necessary for the UDP to present the methodology by which account was taken of housing land commitments, assumptions relating to dwellings which might arise on small sites and windfall sites and the capacity of housing allocations in the area of the Eryri Local Plan in order to reach a conclusion in respect of the number of new dwellings for which allocations had to be made in the UDP area.

14. In order that this process could incorporate a spatial dimension it was necessary for the DCA boundaries to be drawn throughout Gwynedd, including that part which is subject to the Eryri Local Plan. The Snowdonia National Park Authority was consulted at UDP preparation stage, and was given the opportunity, via the inquiry process, to express its views on the number of dwellings in each DCA that related to land within its area. Its view on these matters is presented in the section of this report which relates to Policy CH1. The outcome of that exercise, as expressed in the UDP, is limited to proposals for action within the area of the UDP only. Nowhere within that document are proposals made for the development or use of land within the Snowdonia National Park. I conclude that there is nothing in the DCA concept, or the way it has been applied, which constrains the freedom of action of the Snowdonia National Park Authority to formulate appropriate planning policies and proposals for its area.

15. The same objector expresses concern that the DCA methodology and the related boundaries have not been adequately justified. These matters are dealt with in the section of this report which relates to Policy CH1.

*The classification of settlements*

16. Objectors express concern that the DD does not present the details of the assessment that was undertaken of the settlements within the plan area and which justified their assignment to the hierarchy of Sub-regional Centre, Urban Centre, Local Centre, Village and Rural Village. This is, in fact, presented in an inquiry topic paper entitled 'The Classification of Settlements, Development Boundaries and Selection of Allocated Sites in the Gwynedd UDP'. The LPA proposes, via NA 21, to refer to the criteria for the classification of settlements within the UDP text.

17. Objectors argue that Abersoch should be classified as a Local Centre and not as a Village. That settlement does not, however, contain a sufficiently wide range of facilities which are capable of meeting the day to day needs of its population and that of the neighbouring areas. It is not a significant provider of employment other than seasonal jobs. For these reasons it will, at present, be necessary for residents to travel to other centres for most purposes. Because of the limited extent to which further development would be possible without impairing its rural character it is necessary, in the interests of promoting a sustainable pattern of settlement, to restrict Abersoch to the status of a Village.

18. An objector argues that Blaenau Ffestiniog should not be classified as an Urban Centre because this will lead to pressure for the development of housing in nearby Villages that are within the Snowdonia National Park. The range of facilities at Blaenau Ffestiniog, i.e. secondary and primary schools, railway station, medical surgeries, shops and places of worship, together with an extensive range of employment opportunities confirm that the settlement has a significant strategic function. Development pressure for the development of houses in adjoining areas of the Snowdonia National Park might well be stimulated by this classification but, if this is considered to be undesirable, the local planning authority for that area can introduce the appropriate policies to control this via its own statutory development plan.

*The functions of the plan*

19. An objector argues that paragraph 1.3.5 of the DD, which deals with the two most important functions of the plan, should make reference to the special linguistic, cultural and environmental characteristics of the area. The LPA agrees and, via NA 14, proposes to introduce an explicit reference to these factors. I conclude that this satisfies the concerns of the objector.

*The importance of Welsh language and culture*

20. An objector argues that the statements of the plan's aims for each DCA do not refer to the protection of the social, linguistic and cultural fabric of communities. The LPA agrees that a reference should be made to this as an explicit aim of the plan. Via NA 19 it proposes to change the stated aims for the Bangor and Caernarfon DCAs to that effect. I conclude that this satisfies the concerns of the objector in relation to the aims for these two DCAs but the LPA does not propose to include this aim for the remaining ones. If this aim is appropriate for the Bangor and Caernarfon DCAs it must also be appropriate for the others. For this reason I conclude that the protection of the social, linguistic and cultural fabric of communities should be inserted as an explicit aim for the remaining DCAs of the plan area.

*The proposed restriction of housing development in particular settlements*

21. The LPA is concerned that Villages in coastal and rural housing market areas have for a long time been very popular places of residence for those from outside the area seeking second homes and dwellings for retirement. It believes that such development can, over time, dominate a settlement reducing the use of the Welsh language which is a vital element of local culture. It, therefore, proposes that no allocations for open market housing will be made in such places.

22. An objector argues that this measure will not reduce the demand for such homes in these Villages. This will continue at present levels and a failure to meet it with an acceptable supply of new homes will simply increase the price of the existing housing stock in these settlements. This will further reduce the scope for local people to buy houses there. Furthermore, the lack of new house building for the open market will remove the scope for affordable homes for local people to be built as part of such schemes.

23. The document 'Unitary Development Plans – Wales' (paragraph 3.9) advises that, where the use of the Welsh language is part of the social fabric of a community, the needs and interests of the language should be taken into account in the formulation of UDP policies. Planning Policy Wales (PPW) (paragraph 2.10.3) advises that it should be the aim of LPAs to provide for the broad distribution and phasing of housing development, taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Appropriate UDP policies about the broad scale, location and phasing of new development could assist in achieving that aim. Policies relating to affordable housing could also be of benefit.

24. I agree with the objector that a restriction on the building of new market housing in these villages is likely, via the price mechanism, to reduce the scope for new Welsh speaking households to become established within these settlements. It would, however, prevent a further deterioration in the prospects for the Welsh language within them and provide a period of stability during which the LPA's proposals for affordable housing can help to reinforce local culture.

25. I conclude that there is a real prospect that further open market housing development in the coastal and rural villages of Gwynedd will erode the position of the Welsh language within them. They are, therefore, exactly the sort of places where policies on the location of housing development should be applied in accordance with the advice of PPW. In this case the appropriate policy is to steer such development entirely away from such places.

*The definition of sustainable communities*

26. Paragraph 1.3.2 of the DD defines sustainable communities. An objector argues that it would be helpful to the users of the plan if the source of this definition was presented. The LPA agrees and proposes to secure this via NA 12. I conclude that this satisfies the concerns of the objector.

*The role of retail development in maintaining the Sub-regional Centre*

27. An objector argues that the plan's strategy should make specific reference to the promotion of improvements which would maintain status and role of the Sub-regional Centre of Bangor. The role of retail development is emphasised in this respect. The LPA agrees and, via NA 19, proposes to change the statement of aims for the Bangor and Caernarfon DCAs to refer specifically to the promotion of development that will lead to investment, employment and activity that maintains or strengthens the status of Bangor as a Sub-regional Centre. The plan is to be read as a whole. I conclude that when NA 19 is read together with Strategic Policy 18 which relates to retail and town centres this satisfies the concerns of the objector.

*The emphasis to be given to the re-use of land and buildings*

28. An objector argues that the strategy should recognise the vital role to be played by the re-use of existing developed resources in achieving a sustainable pattern of development. Paragraph 1.3.43 of the DD (third bullet point), when dealing with the location of development, explicitly confirms that a high priority will be given to the redevelopment and re-use of buildings and previously developed land.

29. Another objector argues that not every previously developed site will be suitable for development. Much will depend on its location relative to settlements and supporting services. The LPA agrees and, via NA 18, NA 19 and NA 26, proposes to amend paragraphs 1.3.23, 1.3.25 and Strategic Policy 6 to the effect that only suitable previously developed land and buildings will be given favourable consideration for development. I conclude that these proposed changes satisfy the concerns of the objector.

30. An objector argues that the UDP should set a target that some 70% of development should take place on previously developed land. The Welsh Assembly Government has not, however, set specific targets for local authorities in Wales. In this particular plan area there is only a limited availability of previously developed land and buildings within settlements. To set a specific target at as high a level as that postulated by the objector would inevitably direct development to previously developed land at some distance from established centres, and would promote an unsustainable pattern of settlement. I conclude that, in this particular plan area, it would be counter-productive to set such a target. Instead reliance should be placed, as the DD proposes, on policies which seek to maximise the use of previously developed land within or near to settlements.

*The basis for the phasing of the development of allocated housing sites*

31. An objector argues that the development of allocated housing sites should be phased in a manner which takes account only of their environmental sensitivity, the least sensitive being developed first. As I demonstrate in the section of this report which relates to Policy CH1 it is reasonably certain that all the allocated housing sites will be required for development during the plan period. This consideration removes the benefit of the objector's approach. In any case the phasing of housing land allocations must take account of a wider range of considerations including the balance of housing need and supply in particular



areas, the relationship between housing supply and economic growth and the availability of necessary supporting infrastructure.

*The promotion of economic growth*

32. DD paragraph 1.3.4 presents the four objectives which will contribute to the achievement of sustainable communities. One of these is the promotion of appropriate economic growth and growth in employment. An objector argues that this should be changed to the promotion of a sustainable economy. The 'maintenance of high and stable levels of economic growth and employment' is, however, identified by the Welsh Assembly Government as an appropriate objective. I conclude that the DD text is soundly based in this regard.

*The merits of farm diversification*

33. An objector argues that the UDP should explicitly support farm diversification. The LPA agrees and, via NA 33, proposes to change the wording of Strategic Policy 16 to make a specific reference to this. I conclude that this satisfies the concerns of the objector.

*The concept of integrated transport*

34. An objector notes that the term 'integrated transport' is used within the DD but is not defined. The LPA agrees that a definition is essential and proposes, via NA 15, to provide this. I conclude that this satisfies the concerns of the objector.

*The role of tourism in the local economy*

35. An objector argues that the statement of the plan's strategy should recognise the role of tourism in sustaining the local economy. He seeks a specific reference to this within paragraph 1.3.33 of the DD. The UDP is to be read as a whole, however. The strategy, in accordance with its general scene-setting role, identifies the provision of a sustainable framework for enabling economic development and creating employment in the rural and coastal communities as one of the aims for those areas. In paragraphs 6.1.8 and 6.1.12 it addresses the matter of tourism in some detail. In paragraph 6.1.10 it explicitly notes that supporting and developing the tourism sector is vital to the economy of Gwynedd and that it will have an important role to play in helping the economy to diversify. I conclude that, read as a whole, the UDP does recognise the essential role of tourism in the development of the local economy.

*The need for continuing liaison between the local planning authorities of Gwynedd*

36. An objector emphasises the need for close co-operation in policy formulation between the Snowdonia National Park Authority and the local planning authority for the remainder of Gwynedd. The latter body agrees and, via NA 16, confirms that there will be continuous consultation and co-operation between both local planning authorities. I conclude that this satisfies the concerns of the objector.

*The procedures for public consultation*

37. An objector argues that public consultation procedures should be improved. Those adopted by the LPA did, however, conform to the requirements of the Town

and Country Planning (Development Plan) Regulations 1991 (as amended) and the advice of Unitary Development Plans – A Guide to Procedures (2001) which has been prepared by the Welsh Assembly Government. The LPA, at the opening of the inquiry, confirmed that all relevant procedures have been complied with. I conclude that an appropriate opportunity has been provided for interested persons and parties to express their views upon the plan during its period of preparation through the DD and Pre-inquiry Proposed Change stages. Further amendments that have been proposed as Further Proposed Changes will need to be the subject of formal public consultation as part of the proposed modifications process if the Council wishes to incorporate them into the plan.

*Grammatical matters*

38. An objector notes that DD paragraph 1.3.22 appears to be incomplete. The LPA confirms that this paragraph, in fact, contains wording which was not intended to be there. Via NA 17 it proposes to delete this. I conclude that this, by securing the comprehensibility of the text, satisfies the concerns of the objector.

39. The LPA proposes, via NA 21, to present the criteria which were applied when the development potential of individual settlements was assessed. Criterion (iv) referred to 'the ability to develop/obstructions to development'. An objector argues that the word 'obstructions' should be replaced with 'constraint'. The LPA agrees that this would render the text more comprehensible.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0015) that the DD be modified by the deletion of the concept of Dependency Catchment Areas as the basis for the distribution of housing land allocations and that, instead, these be distributed to reflect the defined hierarchy of settlements in the Plan area as a whole;**

**(REC.0016) that the DD be modified by the acceptance of NA 12;**

**(REC.0017) that the DD be modified by the acceptance of NA 14;**

**(REC.0018) that the DD be modified by the acceptance of NA 15;**

**(REC.0019) that the DD be modified by the acceptance of NA 16;**

**(REC.0020) that the DD be modified by the acceptance of NA 17;**

**(REC.0021) that the DD be modified by the acceptance of NA 18;**

**(REC.0022) that the DD be modified by the acceptance of NA 19;**

**(REC.0023) that the DD be modified by the acceptance of NA 21 subject to the re-wording of criterion (iv) as follows: 'the ability to develop and constraints to development';**

**(REC.0024) that the DD be modified by the acceptance of NA 26;**

**(REC.0025) that the DD be modified by the acceptance of NA 33;**

**(REC.0026) that the DD be modified by the incorporation within each of paragraphs 1.3.33, 1.3.38 and 1.3.42 of an additional bullet point with the wording 'To protect the social, linguistic and cultural fabric of the communities';**

**(REC.0027) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 1 – TAKING A PRECAUTIONARY APPROACH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA22

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/7	House Builders Federation		245
B/999/1	Rossisle Development Co Ltd	M Gilbert, The Planning Consultancy	245

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/4	Chris Wynne (North Wales Wildlife Trust)		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/790/3	Gwynedd Archaeological Trust		245
B/783/12	Welsh language Board		245

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2210	Welsh Assembly Government		245

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and guidance.

### Inspector's Considerations and Conclusions

1. DD Strategic Policy 1 provides that proposals that would have an unacceptable impact on the environment, community or economy of the plan area or on the Welsh language or cultural character of Gwynedd's communities will be refused. An objector expresses concern that the term 'proposals' is insufficiently precise. The LPA, via NA 22, proposes to amplify this by use of the term

'development proposals'. I conclude that this would emphasise that the purpose of the policy is to provide a framework for the determination of planning applications which, themselves, are related to the development and use of land.

2. Objectors argue that the policy is not expressed in terms which will secure a consistent approach to decision making. The policy is intended by the LPA to implement the Precautionary Approach. PPW (paragraph 2.2.1) presents the principles which underpin the approach of the Welsh Assembly Government to the formulation of planning policy for sustainable development. One of these is the 'Precautionary Principle' which is amplified by the explanation that cost-effective measures to prevent possibly serious environmental damage should not be postponed just because of scientific uncertainty about how serious the risk is. The LPA, therefore, needs a policy framework to guide its decision making in circumstances where the impact of a planning application is uncertain. Such circumstances could periodically arise due to the lack of necessary information submitted as part of a planning application.

3. PPW gives support to a policy approach by which decisions can be taken to refuse planning permission in the absence of conclusive evidence as to the seriousness of the risk. The LPA proposes, via NA 22, to change the wording of Strategic Policy 1. This would provide for the refusal of planning applications if there is a possibility of either an unacceptable or an undetermined impact unless evidence is produced which proves conclusively that this impact can be negated or reduced in a way that is acceptable to the LPA. The related NA 394 presents details of the relevant impact assessments that may be undertaken.

4. I consider that Strategic Policy 1, as subject to NA 22, takes the basic approach of WAG policy and modifies it so that it can be effectively applied via the Town and Country Planning system. Rather than taking a decision (perhaps to refuse planning permission) simply because the extent of an identified risk is uncertain, it provides the scope for the developer to demonstrate that the impact can be negated or reduced in the particular circumstances of the site and the detail of the development scheme. For this reason I conclude that NA 22 maximises the scope for development to proceed in the circumstances envisaged by PPW. It, therefore, effectively responds to the concerns of an objector that the whole tenor of this policy is anti-development.

5. The detailed wording of Strategic Policy 1, as subject to NA 22, requires however that any impact be negated or reduced in a way which is acceptable to the LPA. There is no guidance as to what measures would satisfy that body. This wording therefore introduces a measure of uncertainty. This could be removed by adoption of the wording in Policy A3, as amended by NA 43, to the effect that development proposals will be refused unless it can be shown, by an appropriate impact assessment, that any adverse impact can be negated or mitigated.

## **RECOMMENDATION**

**I recommend:**

**(REC.0028) that the DD be modified by the re-wording of Strategic Policy 1 as follows: 'Development proposals which would have an adverse or uncertain impact on the environment, economy and cultural character (including the Welsh language) of the plan area will be refused unless it**

**can be conclusively shown by an appropriate impact assessment that this can be negated or mitigated';**

**(REC.0029) that NA 22 be not accepted;**

**(REC.0030) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 2 – THE NATURAL ENVIRONMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA23

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/23	Environment Watch Wales & the Borders		121
B/773/5	Chris Wynne (North Wales Wildlife Trust)		121
B/866/6	Snowdonia National Park Authority		121

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/790/4	Gwynedd Archaeological Trust		
B/1034/1	Welsh National Trust	Chris Lambart	

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/773/2045	Chris Wynne (North Wales Wildlife Trust)		

### Main Issues

- Whether the clarity of the Policy would benefit from its re-drafting.
- The need to refer to poorer landscapes of local biodiversity value.
- Whether the term “inappropriate” should be defined.
- The protection of the National Park.

## Inspector's Considerations and Conclusions

### *Whether the clarity of the Policy would benefit from its re-drafting*

1. The Council accepts that in its DD form the wording of the Policy is unduly complicated, which makes it difficult to understand. I consider that the revised wording as set out in NA 23 is an improvement but could be further improved by referring to "and landscape character" in the opening line rather than "and character of the landscape". An objector opposes the reference to open land between communities - this is omitted in the Pre-inquiry Proposed Change version, and I agree with the change as it dispenses with the unnecessary listing of the potential attributes of the natural environment.

### *The need to refer to poorer landscapes of local biodiversity value*

2. NA 23 seeks to address this objection by deleting the reference to the "special" character of the landscape. In my view this broadens the scope of the Policy and ought to be included. In the interests of conciseness it is not necessary to include a specific reference to poorer landscapes or their potential biodiversity value.

### *Whether the term "inappropriate" should be defined*

3. The Council proposes to replace the term "inappropriate" with "unacceptable" as part of its aim of ensuring consistency of terminology throughout the Plan's strategic policies. This change is proposed by NA 23 but does not address the objector's concern that such terminology lacks precision and should be defined. Whilst I agree that policies should be clear this needs to be balanced against the dangers of inflexibility that can arise from policies that are too prescriptive. It is not practical, or indeed possible, for policies to seek to precisely define what is meant by 'inappropriate' or 'unacceptable' in this context. This will be a matter that will require the decision maker to exercise sound judgement in applying the Policy's requirements in the context of a particular development proposal.

4. Elsewhere in this report I deal with an objection to the use of the phrase 'unacceptable harm' and conclude that it should not be used as a criterion within policies. A decision on whether any impact is unacceptable should be carried out by the decision maker at the end of the assessment of a planning application, taking into account all relevant development plan policies as well as any other material considerations. The inclusion of 'unacceptable' within any policy would mean that a decision on the acceptability of a scheme is introduced at too early a stage in the process. A more suitable term would be "significant harm". The need to achieve consistency is recognised by the Council in this respect, and to this end I suggest it replaces the terms 'inappropriate/unacceptable harm/impact', that appear throughout the Plan, with 'significant harm'.

### *The protection of the National Park*

5. In response to an objection the Council has included a reference to protecting the views in and out of the Snowdonia National Park as part of NA 23. I concur that such a change is appropriate. In addition to the National Park the Pre-inquiry Proposed Change also identifies the Anglesey Area of Outstanding Natural



Beauty. In identifying the need to protect views to and from these designated areas it follows that the same aim should apply to the Llyn Area of Outstanding Natural Beauty. That this AONB lies within the Plan area does not alter the need to offer the same degree of protection to views that would affect it as are being applied to designations outside the Plan area.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0031) that the DD be modified by the acceptance of NA 23 as further amended by:**

- **the deletion of "and character of the landscape" from the opening line of the Policy and replace it with "and its landscape character";**
- **the deletion of "Area" from the third line and to replace it with "and Llyn Areas";**

**(REC.0032) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 3 – BUILT AND HISTORIC ENVIRONMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA24

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/29	CPRW		258
B/790/5	Gwynedd Archaeological Trust		258

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/1034/3	Welsh National Trust		

### Main Issue

- A requirement that designs are 'suitable' or 'appropriate'

### Inspector's Considerations and Conclusions

1. Objection is raised to this Policy on the basis that it should also require the design to be "suitable" or "appropriate". I conclude that this concern is acceptably addressed by NA 24 which introduces a further design requirement for new development in historic areas – that it maintains or improves the special character of the protected areas.

### RECOMMENDATION

I recommend:

**(REC.0033) that the DD be modified by the acceptance of NA 24 and that no other modification be made in response to these objections.**

## STRATEGIC POLICY 4 – DESIGN STANDARDS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA25

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/24	Environment Watch Wales		122
B/870/11	Sustainable Gwynedd Gynladwy		122
B/1005/1	British Telecommunications PLC	Mandip Dhillon (RPS)	122

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/8	House Builders Federation		122
B/734/16	Welsh Assembly Government		122

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/790/6	Gwynedd Archaeological Trust		
B/1034/4	Welsh National Trust	Chris Lambart	

### Note

- As identified in the box heading above, NA 25 is a Pre-inquiry Proposed Change to this Policy. At the end of NA 25 is a title "Key Partners" which is followed by a list of 3 organisations numbered 10 to 12. This list does not appear in the Deposit Draft and appears to be unrelated to the Policy. No explanation has been provided and I assume that it has appeared in error.

### Main Issues

- Whether the Policy is too long.
- A requirement that developments enhance the natural environment where opportunities arise.

- Whether the Policy should seek to define good design, and include modern innovative approaches.
- The requirement that development makes a positive contribution.

## **Inspector's Considerations and Conclusions**

### *Whether the Policy is too long*

1. In its Proof of Evidence the Council accepts that the Policy is "long-winded" and suggests that NA 25 remedies this. In my view it does not, the length of the Pre-inquiry Proposed Change version is not significantly shorter than its predecessor. Policy B21 deals with building design and it is within that policy that detailed aspects of design should be addressed. The strategic policy needs only to address overall strategy. An objector suggests a more concise form of wording, which I consider could be further simplified. There is no need to mention matters such as scale and location or the efficient use of land resource. Simply it seeks good design that is appropriate to its setting. I conclude that the Policy should be made more concise and I suggest a form of wording in my Recommendation below.

### *A requirement that developments enhance the natural environment where opportunities arise*

2. In light of my comments on the first main issue it follows that I do not consider it appropriate to add further detail to the Policy. I have considered the comments made by the objector on this matter further in my assessment of B21.

### *Whether the Policy should seek to define good design, and include modern innovative approaches*

3. I note that NA 85 introduces a reference to the Design Commission for Wales as a supplement to the supporting text of Policy B21 which deals with design. As I point out in my consideration of the first main issue above, it is within this detailed policy that more detail should be provided on the meaning of good design.

### *The requirement that development makes a positive contribution*

4. Objectors point out that the expectation that all development contributes positively to the landscape and built environment and makes an important contribution to sustainable development exceeds that sought by national policy. The Council agrees that the approach imposes too a high a test and this is reflected in NA 25.

5. The thrust of national policy as set out in PPW and TAN12: Design is to promote high quality design (paragraph 2.9.12 of PPW). In situations where the quality of the built environment is poor, preserving the character of an area can be met by designing buildings that are not 'good' design. National policy does not seek to perpetuate poor or mediocre design, but raise the threshold in seeking good design in all development (paragraph 2.9.1 of PPW). In the light of this it is reasonable that the strategic policy of the Plan addressing design should aim to ensure that development that makes a positive contribution. To temper this requirement with the qualification "where possible" introduces a necessary degree of pragmatism to the Policy. Bearing in mind the strategic level of this Policy, I

disagree with the Council's view that this phrase would weaken the Plan. The 'possibility' of achieving positive contributions to the various aspects of good design can be properly assessed in the context of a specific development proposal.

## **RECOMMENDATION**

**I recommend:**

**(REC.0034) that the DD be modified by deleting the Policy in its entirety and replacing it with:**

**"Development will be expected to be of a good design in order to ensure that it makes a positive contribution, wherever possible, to the landscape, built environment and sustainable development.";**

**(REC.0035) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 5 – DEVELOPMENT WHICH CREATES RISK

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/25	Environment Watch Wales & the Borders		123
B/726/3	Tom Brooks		190

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/790/7	Gwynedd Archaeological Trust		

### Note

- Representation B/726/3 is recorded above as an objection. However, as the Council acknowledges in its Proof of Evidence 190, it is clear that it is an expression of support for this Policy but which also includes objection to the way risk is addressed in Part 2 of the Plan. I deal with this element of the representation in the section of my report dealing with the Introduction to Chapter B of the Plan.

### Main Issue

- Land instability and soil erosion.

### Inspector's Considerations and Conclusions

1. The objector considers that matters of land instability and soil erosion should be added to the Policy. I concur with the Council's view that to do so would add too much detail to the Policy, contrary to national guidance which emphasises that policies within Part 1 of the Plan should be limited to providing a strategic framework. Furthermore, by referring to "developments that create a risk of unacceptable damage to health, property or the environment", the Policy encompasses considerations that would arise from instability or erosion. Policies within Part 2 of the Plan deal with such matters in greater detail. I conclude that there is no need to modify the Policy

**RECOMMENDATION**

**I recommend:**

**(REC.0036) that no modification be made to the DD in response to this objection.**

## STRATEGIC POLICY 6 – LAND REDEVELOPMENT AND REUSE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA26

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/26	Environment Watch Wales & the Borders		124

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/8	Gwynedd Archaeological Trust		124
B/734/17	Welsh Assembly Government		124

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/959/1	Mr K Salisbury	CDN Planning	
B/1034/5	Welsh National Trust	Chris Lambart	
B/1005/3	British Telecommunications Plc	Mandip Dhillon	

### Note

- Objection B/790/8 is dealt with in the section of this report which relates to Policy C3.

### Main Issues

- More efficient use of land through increased density
- Retention of the second sentence of the Policy
- The potential archaeological value of previously used land.

### Inspector's Considerations and Conclusions

*More efficient use of land through increased density*



1. In response to an objection the Council contends that increasing density is a detailed matter that should not be addressed within this strategic policy, and points to Policy B21 which deals with detailed considerations of design and layout etc. I disagree. It seems to me that, just as encouraging the use of previously developed land in favour of green field sites is a strategic aim, the same is true of the aim of encouraging more efficient use of all land. I conclude that the Policy ought to be amended to address this omission.

*Retention of the second sentence of the Policy*

2. The Council proposes NA 26 which deletes the second sentence of the Policy. I agree that it deals with detailed considerations which ought not to be included within a strategic policy.

*The potential archaeological value of previously used land*

3. NA 26 dispenses with the specific reference to types of unacceptable impact that may arise from developing previously used sites and replaces it with a requirement that the land is "appropriate to be developed". Such a phrase would embrace a wide range of considerations including archaeology thereby avoiding an unnecessary degree of detail within this strategic policy. Archaeology is specifically dealt with by Policy B7 and I have recommended that the detailed policy dealing with the use of previously developed sites, C3, includes a cross-reference to B7.

## **RECOMMENDATION**

**I recommend:**

**(REC.0037) that the DD be modified by the acceptance of NA 26 as further amended by the inclusion of a reference to the need to achieve efficient use of land through increasing the density of development, where appropriate.**

**(REC.0038) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 7 - MINERALS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA27

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/1	CPRW		259
B/790/9	Gwynedd Archaeological Trust		259

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/18	Welsh Assembly Government		259
B/734/19	Welsh Assembly Government		259

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/3	Environment Agency Wales		

### Main Issues

- The historic value of secondary aggregate sites.
- The reference to "landbank" and consistency with Part 2 of the Plan.

### Inspector's Considerations and Conclusions

#### *The historic and cultural value of secondary aggregate sites*

1. The Council contends that the policy acknowledges the potential archaeological and historic interest of sites containing mineral resources through its reference to environment. I agree that, given that the Policy seeks to provide strategic direction only, elaborating on this matter is not necessary. Indeed, as the Council points out, Strategic Policy 3 emphasises the importance of protecting the historic environment and detailed policies B7 and B12 deal with the protection of archaeological interests and historic landscapes, respectively.

2. As the objector acknowledges there are other policies that address matters relating to the area's industrial heritage. There are also policies within the Plan that deal with cultural and archaeological heritage which are matters, in the context of mineral workings, that the objector considers should be given greater prominence within the Plan. I disagree on the basis that the Plan should be read as a whole and that the specific policies dealing with this matters should provide adequate safeguards to these important considerations. The weight to be afforded to such considerations will be a matter to be determined in response to individual proposals, and is not a matter that needs to be addressed further in this strategic policy.

*The reference to "landbank" and consistency with Part 2 of the Plan*

3. The Council accepts that the reference in the final sentence of the Policy to safeguarding Gwynedd's contribution to the regional and national mineral landbank is inappropriate. It addresses this in NA 27 by replacing "mineral landbank" with "demand". This change improves clarity of meaning and ensures consistency with Part 2 of the Plan. On a minor typographical detail, the Pre-inquiry Proposed Change has failed to correct a missing "'s" that should appear at the end "Gwynedd".

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0039) that the DD be modified by the acceptance of the changes proposed by NA 27 and as further amended by inserting "'s" at the end of "Gwynedd";**

**(REC.0040) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 8 - WASTE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA28

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/20	Welsh Assembly Government		260

### Main Issue

- Whether the Policy should refer to the Regional Waste Plan.

### Inspector's Considerations and Conclusions

1. An objector contends that the Policy should mention the Regional Waste Plan in addition to the Wales Waste Strategy. In response the Council has introduced NA 28, which deletes the reference to the Wales Waste Strategy, and adopts a more general approach by referring to "national, regional and local waste strategies". I consider that such an approach is more suitable for such a strategic policy; it also has the advantage of avoiding the plan becoming out-of-date as a result of specific documents being superseded during the Plan's lifetime.

### RECOMMENDATION

I recommend:

**(REC.0041) that the DD be modified by the acceptance of NA 28;**

**(REC.0042) that no other modification be made to the DD in response to this objections.**

## STRATEGIC POLICY 9 - ENERGY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/28	Environment Watch Wales & the Borders		125
B/768/7	Gareth Dobson		125
B/768/8	Gareth Dobson		530

### Main Issues

- Requiring the removal of temporary structures when no longer used.
- Whether the Policy is sufficiently far-reaching.

### Inspector's Considerations and Conclusions

#### *Requiring the removal of temporary structures when no longer used*

1. I agree with the Council that the concern raised by the objector in relation to requiring the removal temporary structures when no longer required is not a matter that should be addressed within this strategic policy. I note that the matter is specifically addressed by detailed policy C26.

#### *Whether the Policy is sufficiently far-reaching*

2. The objector considers that the Policy should encourage specific types of renewable energy techniques, and criticises the emphasis elsewhere in the Plan on the use of slate as a roofing material. Detailed considerations relating to this subject are addressed by policies within Part 2 of the Plan. I have dealt with the objector's concern regarding the use of slate rather than more modern alternatives under my consideration of Policy B24. I conclude that the Policy's provides an acceptable strategic framework for renewable energy developments.

### RECOMMENDATION

#### I recommend:

**(REC.0043) that no modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 10 - HOMES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA29

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/930/3	Dishland Ltd	Derek Prosser, Derek Prosser Associates	RTS – Housing Supply
B/974/1	Annwyl Construction Company Ltd	Brockway Dunn Ltd	RTS – Housing Supply
B/756/29	Environment Watch Wales & The Borders		RTS – Housing Supply
B/867/9	House Builders Federation		RTS – Housing Supply
B/866/7	Snowdonia National Park Authority		RTS – Housing Supply
B/244/3	Steve Eaves		RTS – Housing Supply
B/866/8	Snowdonia National Park Authority		RTS – Housing Supply
B/983/3	Headland Promotions	Emery Planning Partnership	RTS – Housing Supply
B/768/4	Gareth Dobson		RTS – Housing Supply
B/1042/6	Owen Davenport Ltd		RTS – Housing Supply
B/1032/4	Mrs C Jones	John Alun Jones	264
B/999/10	Rossisle Development Co Ltd	M Gilbert, The Planning Consultancy	RTS – Housing Supply

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/21	Welsh Assembly Government		264

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/911/2025	Welsh Development Agency		

#### Note

- The following objections are dealt with in the section of this report which relates to Policy CH1: B/930/3, B/974/1, B/756/29, B/867/9, B/866/7, B/244/3, B/866/8, B/983/3, B/768/4, B/1042/6, B/999/10 and B/1032/4.

#### Main Issue

- Whether the DD is appropriate, having regard to the clarity of policy expression.

#### Inspector's Considerations and Conclusions

1. DD Strategic Policy 10 informs that sites for new housing for general need in each Dependency Catchment Area have been allocated in accordance with the related table. An objector expresses concern that this statement neglects those dwellings which will arise by other means, including those in the committed, windfall and small site categories. The LPA agrees and proposes, via NA 29, to reword the policy in such a way as to make clear the contribution of each element of the supply. I conclude that this will provide a comprehensive summary of the relevant sources of housing land supply.

#### RECOMMENDATION

I recommend:

**(REC.0044) that the DD be modified by the acceptance of NA 29;**

**(REC.0045) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 11 - ACCESSIBILITY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/317/4	Bangor Civic Society		261

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/12	Sustainable Gwynedd Gynladwy		

### Main Issue

- The effect of highway congestion on the scope for further development.

### Inspector's Considerations and Conclusions

1. Strategic Policy 11 presents a general statement of the approach to the control of development insofar as it relates to the impact of this on accessibility. The objector refers to the congested nature of particular parts of the highway network of Bangor. He expresses concern that, until these problems are resolved, this will constrain development schemes. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from this or if new and adequate improvements can be made which are consistent with the function of the road.

### RECOMMENDATION

I recommend:

**(REC.0046) that no modification be made to the DD in response to this objection.**



## STRATEGIC POLICY 13 – COMMUNITY FACILITIES AND SERVICES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA30

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/27	Environment Watch Wales & the Borders		126

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/22	Welsh Assembly Government		126

### Main Issue

- Whether the DD is appropriate, having regard to the clarity of the policy wording.

### Inspector's Considerations and Conclusions

1. DD Strategic Policy 13 provides that development proposals that maintain and improve the existing provision of community services and facilities or amenity space within the community will be approved if they do not have an unacceptable impact on the environment or the amenities of nearby residents. An objector argues that, to be acceptable, a scheme need not both maintain and improve existing provision. It could do one or the other. The LPA agrees and proposes, via NA 30, to replace the word 'and' with 'or'. I conclude that this will introduce the necessary clarity to the plan text.

2. A further objector argues that the concept of 'unacceptable impact' should be replaced with that of 'minimum impact'. This would not be appropriate because the minimum impact in a particular circumstance might still be unacceptable. For the reasons I give in the sections of this report which relate to Policy SP2 (paragraph 4) and Policy C26 (paragraph 9) I recommend that the term be replaced with 'significant harm'.

### RECOMMENDATIONS

**I recommend:**

**(REC.0047) that the DD be modified by the acceptance of NA 30;**

**(REC.0048) that the DD be modified throughout its text by the replacement of the term 'unacceptable impact' with 'significant harm';**

**(REC.0049) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 14 – SPORTS AND LEISURE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA31

This Section is subject to Further Proposed Changes Nos: NAP80

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/24	Welsh Assembly Government		262
B/734/23	Welsh Assembly Government		262
B/734/25	Welsh Assembly Government		262

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2211	Welsh Assembly Government		262
B/734/2204	Welsh Assembly Government		262

### Main Issues

- Whether the reference to “recognised need” should be omitted.
- Protecting or improving existing facilities.

### Inspector’s Considerations and Conclusions

*Whether the reference to “recognised need” should be omitted*

1. The Council accepts that there is no justification for requiring that development proposals for sports and leisure activities “fulfil a recognised need”. NA 31 addresses this by deleting the requirement. However, in its amended form the Policy continues to require that such development should “expand the range of activities”. This seems to me to be an unreasonable requirement given that the provision of development that provides sports or leisure facilities should generally be welcomed, even though schemes that expand the range of provision may offer greater benefits. The Policy should be further amended to delete this requirement.

*Protecting or improving existing facilities*

2. In response to this objection the Council proposes to introduce the phrase "maintain or improve existing sports and leisure facilities". I consider that this is an appropriate addition to the Policy which would offer protection for existing facilities. NAP 80 proposes minor changes to the wording to correct previous typographical errors. One of these changes is not necessary given my findings in relation to the need to delete the reference to expanding the range of facilities, the other should be retained.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0050) that the DD be modified by the acceptance of NA 31 as further amended by the deletion of the phrase "and expand the range of activities available";**

**(REC.0051) that the DD be modified by the acceptance of NAP 80 insofar as it relates to the deletion of "for" but NOT as it relates to the insertion of "that";**

**(REC.0052) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 15 – INDUSTRIAL LAND

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA32

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/10	Welsh Development Agency		531
B/866/32	Snowdonia National Park Authority		531

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/26	Welsh Assembly Government		531
B/734/27	Welsh Assembly Government		531

### Main Issue

- Whether the DD is appropriate, having regard to the structure and content of this policy.

### Inspector's Considerations and Conclusions

1. DD Strategic Policy 15 provides that sites will be designated for employment initiatives to meet the deficit identified in all Dependency Catchment Areas (DCAs) for the period 2001 to 2016. It presents, on a DCA basis, the areas of land which are already available for employment and the additional land which is proposed to be allocated by the plan. The land which is already available includes that in the area of the Snowdonia National Park. The local planning authority for that area argues that it is misleading to include this. The LPA for the area of the Gwynedd UDP agrees and proposes, via NA 32, to exclude this. I conclude that this will secure clarity of policy expression.

2. An objector notes that the total areas of land referred to in Strategic Policy 15 do not coincide with the totals referred to in Part 2 Policies D1 and D2. The LPA agrees that inaccurate figures have been presented in Strategic Policy 15. It proposes, via NA 32, to introduce the correct ones. This same objector argues that additional employment land should be allocated at Parc Menai. I deal with the merits of this in the section of this report which relates to the site-specific objections to Part 2, Chapter D.

3. This same objector argues that there is a need to carefully examine all of the sites which are committed to or proposed for employment uses in order to confirm their availability within the plan period. As regards the committed employment sites the inquiry background paper 'Employment (Industrial and Office Land)' presents an account of the studies which have been undertaken to support the preparation of the UDP. In 2000 the LPA carried out the 'Gwynedd Industrial Land Capacity Study' to assess the existing provision of industrial and business sites in the UDP area and also within the adjacent area of the Snowdonia National Park. This was followed by the 'Vacant Land Appraisal 2001' to assess the suitability of available sites to meet the existing and future needs of all employment sectors. The results of these appraisals were important inputs to the DD of the UDP.

4. The background paper provides an account of the 'Gwynedd Employment Land Study 2005' which was undertaken on behalf of the LPA by consultants to forecast the demand for employment land in Gwynedd up to 2016 and to re-assess the capacity of existing industrial and business sites. This provided the basis for the detailed analysis which was undertaken by the LPA to identify the need for the various types of employment site within the various DCAs of the UDP area. I conclude that the employment land policies of the UDP are based on well documented research and analysis of the existing committed sites and that this has been made available to objectors as part of the inquiry process. To the extent that objections have been made to the identification of specific committed sites and proposed additional allocations these have been dealt with elsewhere in this report.

5. An objector argues that the UDP should contain a specific strategic policy to safeguard land for employment. The LPA agrees and proposes to secure this via NA 32 as an aspect of re-structured Strategic Policy 15. The same objector notes that the English version of DD Strategic Policy 15 uses the phrase 'sites will be designated for employment' when, having regard to the nature of the document, it should say 'sites are designated'. NA 32, in re-structuring the policy as a whole, overcomes this problem and makes the distinction between the land that is already committed to or in employment use, which will usually be safeguarded, and the additional land which is allocated for this purpose.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0053) that the DD be modified by the acceptance of NA 32 subject to the adjustment of the figure for the additional land to be allocated for employment to reflect my recommendations on individual sites;**

**(REC.0054) that no other modification be made to the DD in response to these objections.**

## STRATEGIC POLICY 16 - EMPLOYMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA33

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/6	Tesco Stores Ltd		127
B/756/30	Environment Watch Wales & the Borders		127

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/954/3	Bourne leisure Ltd	Margaret Baddeley, Nathan Lichfield & partners	127

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/13	Sustainable Gwynedd Gynladwy		

### Main Issue

- Whether the DD is appropriate, having regard to the approach to the determination of planning applications.

### Inspector's Considerations and Conclusions

1. DD Strategic Policy 16 provides that development proposals that will strengthen and diversify local economies within Dependency Catchment Areas will be approved if they do not have an unacceptable impact on the environment, the area's cultural characteristics or the amenities of local residents. An objector argues that, to be acceptable, a particular scheme need not both strengthen and diversify the local economy. It would be sufficient for it to do either of these. The LPA agrees and proposes, via NA 33, to replace the word 'and' with 'or'. I conclude that this would clarify that the objectives of strengthening, and also of diversifying the local economy are equally desirable.

2. An objector argues that the concept of 'unacceptable' impact is inappropriate and reference to it should be replaced by 'unnecessary' impact in this policy and throughout the plan. For the reasons I give in the sections of this report which

relate to Policy SP2 (paragraph 4) and Policy C26 (paragraph 9) I recommend that the term be replaced with 'significant harm'.

3. A further objector argues that specific reference should be made in the policy to the contribution of the retail sector in terms of investment and employment. The policy is intended to provide the framework for the determination of planning applications. The stated criteria relate to the effect of the particular scheme on the local economy and other stated interests of acknowledged importance. If, in the specific circumstances of a proposal and its site, significant benefit would arise from a retail scheme in terms of the strengthening or diversification of the local economy, the applicant could refer to these in support of his arguments that planning permission should be granted.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0055) that the DD be modified by the acceptance of NA 33;**

**(REC.0056) that the DD be modified throughout its text by the replacement of the term 'unacceptable impact' with 'significant harm'**

**(REC.0057) that no other modification be made to the DD in response to these objections.**



## STRATEGIC POLICY 17 - TOURISM

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/954/4	Bourne Leisure Ltd	Margaret Baddeley, Nathan Lichfield & Partners	

## STRATEGIC POLICY 18 – RETAIL AND TOWN CENTRES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA34

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/3	CPRW		263

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/28	Welsh Assembly Government		263
B/731/29	Welsh Assembly Government		263

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/14	Sustainable Gwynedd Gynladwy		

### Main Issues

- Reference to “town centres” rather than “service centres”.
- The need to address “amenity”.
- Traffic implications.

### Inspector's Considerations and Conclusions

*Whether the Policy should refer to “town centres” rather than “service centres”*

1. In the context of the Plan the term “service centre” is more precise than “town centre”. It refers to specific centres within settlements that are identified in the Plan. In the interests of clarity NA 34 replaces the reference to “retail and town centres” in the heading to the Policy with “service centres” thereby ensuring consistency with the Policy’s text. Thus, I conclude that there is no reason to change the Policy along the lines suggested by the objector.

*The need to address ‘amenity’*

2. Most of the strategic policies are expressed in generally supportive terms but with a qualifying phrase at the end along the lines of ‘provided that it does not have an unacceptable impact on the environment or the amenities of nearby

residents'. In response to an objection which appears to question the omission of such a qualification in this case, the Council responds that it seeks to avoid excessive detail. Whilst I have noted that the objector has conditionally withdrawn this objection despite the fact that the Council does not propose to introduce such a phrase, it seems to me that this omission introduces an obvious inconsistency of approach between this and some other strategic policies. This should be avoided and it seems that this is best achieved through the introduction of a qualifying phrase. Bearing in mind my conclusion in relation to the third main issue in the section of my report on Strategic Policy 2, the qualifying phrase should avoid phrases such as 'unacceptable impact'. In this context I also consider that there is merit in using the term 'interests of acknowledged importance' rather than specifying considerations such as the environment or the living conditions of residents. Referring to such interests in this general way ensures conciseness and avoids the danger of omitting matters that ought to be considered. Naturally, for reasons of consistency the same basic form of terminology should be used throughout the Plan, unless there are particular reasons for departing from the model.

#### *Traffic implications*

3. An objector considers that the potential traffic implications of retail developments are such that it should be a matter identified in the Policy. I concur with the Council's view that such a consideration is a detailed matter that should not be included with the strategic framework for the plan which is set out in Part 1. Transportation matters are addressed in several of the detailed policies contained in Part 2. Furthermore, the phrase 'interests of acknowledged importance' which I suggest should be used would encompass such a consideration.

### **RECOMMENDATION**

#### **I recommend:**

**(REC.0058) that the DD be modified by the acceptance of NA 34 as further amended by the addition of a phrase to qualify the opening sentence as follows: "provided it does not cause significant harm to interests of acknowledged importance";**

**(REC.0059) that the DD be modified by incorporating, where appropriate, the standard term 'interests of acknowledged importance' as a qualifying phrase;**

**(REC.0060) that no other modification be made to the DD in response to these objections.**

## **OBJECTIONS TO PART 2**

**OBJECTIONS TO CHAPTER 'A'**

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA35; NA36; NA37; NA38

This Section is subject to Further Proposed Changes Nos: NAP62; NAP87

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/10	House Builders Association		324 / RTS Housing
B/783/1	Welsh Language Board		324

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/726/4	Tom Brooks		324
B/734/36	Welsh Assembly Government		324
B/734/34	Welsh Assembly Government		324
B/734/35	Welsh Assembly Government		324

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2212	Welsh Assembly Government		324

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2086	Environment Watch Wales & the Borders		

### Main Issues

- The references to the Precautionary Approach and the Precautionary Principle.
- The regard to be had to the status of the Welsh language in the allocation of land for housing development.

- The approach to policy formulation.

## **Inspector's Considerations and Conclusions**

### *The references to the Precautionary Approach and the Precautionary Principle*

1. Section 2.1 of the DD relates to the adoption of the Precautionary Approach to the formulation of policy. An objector agrees that this is the general context within which the Precautionary Principle is a specific element. He advocates changes to the text of section 2.1 to reflect this relationship between the terms. The LPA agrees and proposes to secure this via NA 35, NA 36 and NA 37. I conclude that this would correctly apply the relevant terms to the plan text. An objector notes the need for a grammatical improvement of NA 36. The LPA agrees and proposes to secure this via NAP 87. I agree that this will improve comprehension.

2. The DD, in paragraph 2.1.8, presents an objective based on the aim of adopting the Precautionary Principle. An objector argues that its wording is not clear and does not fully reflect the preceding text. The LPA agrees and, via NA 38, proposes to re-word this. I agree that this proposed changed wording will better support the application of the Precautionary Principle.

### *The regard to be had to the status of the Welsh language in the allocation of land for housing development*

3. An objector refers to an aim of the plan (expressed in paragraph 2.1.5) that new development should recognise, support and, if possible, reinforce the Welsh language and the cultural identity of the plan area. He notes that Strategic Policy 1 provides that proposals that would have an unacceptable impact on the environment, community or economy of the plan area, or on the Welsh language or cultural character of Gwynedd's communities, will be refused. He argues that the plan should confirm that the housing allocations that are proposed in the plan have already satisfied the requirements of Strategic Policy 1 in terms of the principle of their development for that use.

4. The LPA (in its proof No 324, paragraph 4.4) confirms that since the linguistic and cultural character of communities has been an important consideration in determining where to restrict housing provision for the general market, a proposal for a development on a site that has been allocated for housing in the plan will not need to be the subject of a Linguistic Assessment. This is referred to in DD paragraph 2.2.6 which supports Policy A2 and confirms that the linguistic character of villages has already featured as an important consideration in deciding where to limit open market housing provision. The wording does not, however, provide the degree of certainty that is presented in the LPA's proof to which I refer above. The LPA considers that this would be introduced to the plan via NA 42 but it clearly would not. I conclude that, in the interests of certainty, the important clarification that is presented in the LPA's proof must be explicitly stated in the UDP itself.

### *The approach to policy formulation*

5. An objector argues that the plan should expressly adopt the approach that applications that would have a positive effect on the environment, society, the

economy or the Welsh language will be approved. Individual development schemes can have multiple aspects and impacts on their surroundings, some good, some bad and some neutral when perceived by particular persons and groups. Due to the wide range of interests held by these parties there can be no consensus as to what is a good or a bad effect. Different interest groups will perceive the same outcome in different ways. Furthermore, even if a particular scheme did, on a general consensus, have a good effect in some respect it could easily have unacceptably harmful ones in others. Despite its benefits it might have to be refused for that reason. This is why, as PPW (paragraph 4.1.2) advises, applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0061) that the DD be modified by the acceptance of NA 35;**

**(REC.0062) that the DD be modified by the acceptance of NA 36;**

**(REC.0063) that the DD be modified by the acceptance of NA 37;**

**(REC.0064) that the DD be modified by the acceptance of NA 38;**

**(REC.0065) that the DD be modified by the acceptance of NAP 87;**

**(REC.0066) that the DD be modified by the incorporation of an explicit confirmation that 'since the linguistic and cultural character of communities has been an important consideration in determining where to restrict the housing provision for the general market, a proposal for a development on a site allocated for housing in the plan will not be expected to be the subject of a Linguistic Impact Assessment under Policy A2';**

**(REC.0067) that no other modification be made to the DD in response to these objections.**



**POLICY A1 – ENVIRONMENTAL OR OTHER IMPACT ASSESSMENTS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA39; NA40

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/32	Environment Watch Wales and the Borders		128
B/866/9	Snowdonia National Park		128
B/760/3	CCW		128
B/76/33	Mike Webb (RSPB)		128
B/844/60	CPRW		633

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/4	Welsh Development Agency		128
B/734/30	Welsh Assembly Government		128
B/734/32	Welsh Assembly Government		128
B/734/31	Welsh Assembly Government		128

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/790/10	Gwynedd Archaeological Trust		
B/76/32	Mike Webb (RSPB)		

**Main Issue**

- Whether the DD is appropriate, having regard to the scope of Policy A1.

**Inspector's Considerations and Conclusions**

1. DD Policy A1 provides that development proposals will be refused unless sufficient information is provided with the application concerning any likely environmental or other impacts. Objectors argue that, although the title and text of the policy refer to environmental or other impacts, the supporting text deals with

environmental impacts only. There is, therefore, a need to give guidance on the nature of the other impacts. The LPA agrees that the supporting text is too narrowly focused. It proposes, via NA 39, NA 40 and NA 394 to widen this. I conclude that this will provide the necessary guidance to prospective developers as to the supporting information and analysis to be submitted with particular planning applications.

2. An objector argues that Policy A1 should require that Environmental Assessments, when needed, should be of a high standard and provide that the related planning application will be refused if they are not good enough. The policy, as subject to NA 39, provides that proposals will be refused unless sufficient information is provided with the planning application. This directly addresses the concern of the objector.

3. In order to ensure that the requirements of Environmental Impact Assessments have been interpreted correctly in terms of Town and Country Planning procedures, an objector argues that Policy A1 should refer to 'significant' impacts. He advocates that examples of the different sorts of assessment that may be required should be included within the text of Policy A1. These necessary modifications will be secured by NA 39.

4. An objector argues that Policy A1 should make clear how the LPA will deal with development proposals which may have a significant impact on the environment but which are not subject to the Environmental Impact Regulations 1999. The LPA agrees that the plan must make provision for such circumstances. I conclude that, via NA 40 and NA 394, it makes a clear and comprehensive statement of its approach.

5. Concern is expressed that Policy A1 and its supporting text does not address Special Conservation Areas or, more generally, species and/or their habitats which are of international, national or local importance. The Plan should be read as a whole and Policies B14 and B19 respectively address these matters. An objector argues that Policy A1 should provide for the determination of planning applications that would impinge on the area of the Snowdonia National Park. This aspect of the control of development is secured by NA 99 which proposes to introduce a new policy. This would provide that development will not be permitted where it would adversely affect the qualities and special character of that area. I conclude that there is no need to make any additional changes in response to these concerns.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0068) that the DD be modified by the acceptance of NA 39;**

**(REC.0069) that the DD be modified by the acceptance of NA 40;**

**(REC.0070) that the DD be modified by the acceptance of NA 99;**

**(REC.0071) that the DD be modified by the acceptance of NA 394;**

**(REC.0072) that no other modification be made to the DD in response to these objections.**

## POLICY A2 – LINGUISTIC IMPACT ASSESSMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA41; NA42

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/930/5	Dishland Ltd	Derek Prosser	320
B/867/11	House Builders Federation		320
B/1040/1	Gareth Butler (DB Cymru)		320

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/3	Welsh Development Agency		320
B/734/45	Welsh Assembly Government		320
B/734/43	Welsh Assembly Government		320
B/734/44	Welsh Assembly Government		320

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/30	CPRW		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/726/12	Tom Brooks		
B/866/10	Snowdonia National Park		
B/783/13	Welsh Language Board		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/2029	HouseBuilders Federation		320
B/726/2020	Tom Brooks		320

## Main Issues

- The scope of the policy.
- The prospects for consistent implementation of the policy.
- The consistency of plan text.

## Inspector's Considerations and Conclusions

### *The scope of the policy*

1. DD Policy A2 is entitled Linguistic Impact Assessments. Its text provides that proposals that would, because of their size, scale or location, have an unacceptable impact on the social, linguistic or cultural cohesion of communities will be refused. An objector notes that the content of the policy deals not only with the linguistic matters referred to in its title but also social and cultural ones. He also expresses concern that although the policy title refers to assessments, the content of this sets out the way in which planning applications will be determined.

2. The LPA agrees that the title of the policy is inappropriately expressed. It proposes, via NA 41, to change this to refer to the protection of the social, linguistic and cultural fabric of communities. I conclude that this would secure consistency of policy heading and content.

3. The same objector expresses concern that, as drafted at DD stage, the supporting text for Policy A2 omits to clarify that there will be no discrimination between individuals on the basis of their linguistic ability. The LPA agrees that this is necessary and proposes to introduce this as a final sentence of paragraph 2.2.6, via NA 41. I conclude that this is a vital clarification.

4. DD Policy A2 refers to the social, linguistic and cultural cohesion of communities. An objector, while agreeing that the linguistic and cultural aspects of communities are important matters to be protected, argues that reference to the social aspect should be deleted. PPW (paragraph 2.10.2) does, however, advise that LPA's should consider whether they have communities where the use of the Welsh language is part of the social fabric. Where this is so it is appropriate that this be taken into account in the formulation of land use policies. It is clear, therefore, that because language is an aspect of the social fabric, reference should be made to both concepts in Policy A2.

### *The prospects for consistent implementation of the policy*

5. DD paragraph 2.2.7 which supports Policy A2 informs that if there is any uncertainty about the impact of a proposed development on a community's social cohesion, due to its size, scale or location, developers will be asked to prepare a Linguistic Statement. Objectors refer to the use of terms within the DD policy and also its supporting text at both DD and Pre-inquiry Proposed Change stages which are vital to its use in determining planning applications, but which do not provide the basis for consistent decision making. Reference is made in the plan to the size, scale and location of proposals and to the concept of 'unacceptable impact' on the social, linguistic or cultural cohesion of communities. No guidance is, however, available within either the policy or its supporting text as to how these concepts are to be interpreted and applied.

6. Unitary Development Plans – Wales (paragraph 1.12) advises that the planned system is intended to provide a framework for rational and consistent decision making. There is complete uncertainty as to the size threshold above which a proposal would be considered as large and as to the sort of locations which would be considered unacceptable for development in particular circumstances. There is no guidance on how changes in social, linguistic or cultural characteristics might be measured or on the thresholds beyond which these would be regarded as unacceptable. There is no guidance on the matters to be covered by a Linguistic Impact Assessment or how it might be prepared and presented.

7. The LPA, via NA 42, proposes to change paragraph 2.2.7 to introduce text which would require a Linguistic Statement 'where a significant impact is likely' on the linguistic and cultural character of an area. An impact could be for good or ill, but the objective of the policy should be to prevent harm. For the reasons I give in the sections of this report which relate to Policy SP2 (paragraph 4) and Policy C26 (paragraph 9) I recommend that the term 'significant impact' be replaced with 'significant harm'.

8. DD paragraph 2.2.8 informs that the LPA will prepare Supplementary Planning Guidance (SPG) to provide advice on relevant issues including the recommended approach to the measurement of impact and the preparation of a Linguistic Statement. Unitary Development Plans – Wales (paragraphs 2.12 to 2.16) advises that SPG may be used to set out detailed guidance on the way in which UDP policies will be applied in particular circumstances and areas. It should be prepared in consultation with the general public, businesses and other interested parties and their views should be taken into account before it is finalised. It should then be adopted via a Council resolution.

9. From the evidence given at relevant inquiry sessions it is clear that this SPG is not yet available. Given the advice of Unitary Development Plans – Wales, to which I refer above, I conclude that Policy A2 is incapable of being consistently applied until such guidance has been prepared and adopted.

10. An objector expresses concern that it is not clear whether a Linguistic Impact Assessment must be submitted to support planning applications for the development of housing land which is allocated in the UDP. I deal with this matter in the section of this report which relates to the introduction to the policies of Chapter A.

11. A further objector suggests that Linguistic Impact Assessments should be prepared only for those schemes that will cost more than £3 million. It is not the absolute size of the scheme that is a determining factor but its context. Such a scheme might have a very substantial impact in a small settlement but a negligible one elsewhere. He suggests that the UDP should promote a system of grants related to development but this is not the role of a development plan.

*The consistency of plan text*

12. An objector refers to DD paragraph 2.2.6 which states that an important aim of the plan is to strengthen and protect the culture and character of the County's indigenous communities. He argues that this has not been stated anywhere else in the plan. It is, however, referred to in the fourth sentence of DD paragraph 2.1.5.

13. The same objector draws attention to the last sentence of DD paragraph 2.2.6 which says that the linguistic character of villages has already featured as an important consideration in deciding where to limit open market housing provision. He argues that it is by no means clear where, in the preceding text this is referred to. The LPA agrees and proposes to change the relevant sentence, via NA 41, to simply confirm that the linguistic and cultural character of communities was an important consideration in determining where to restrict housing provision for the general market.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0073) that the DD be modified to the effect that Policy A2 will not be applied to the determination of planning applications until such time as Supplementary Planning Guidance, which will secure its consistent implementation, has been formally adopted by the LPA;**

**(REC.0074) that the DD be modified by the acceptance of NA 41;**

**(REC.0075) that the DD be modified by the acceptance of NA 42 subject to the term 'significant impact' being replaced with 'significant harm';**

**(REC.0076) that no other modification be made to the DD in response to these objections.**

## POLICY A3 – PRECAUTIONARY PRINCIPLE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA43

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/12	House Builders Federation		323
B/999/3	Rossisle Development	M Gilbert	323

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/1	Welsh Development Agency		323
B/734/46	Welsh Assembly Government		323

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/726/13	Tom Brooks		
B/866/11	Snowdonia National Park		
B/773/29	Chris Wynne (North Wales Wildlife Trust)		

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and guidance.

### Inspector's Considerations and Conclusions

1. DD Policy A3 provides that development proposals will be refused if, despite precautionary steps, there is any uncertainty and a possibility of serious or irreversible damage to the environment or community. Objectors argue that planning applications should be refused only if there is evidence (not merely the possibility) that significant harm will arise. They contend that, as drafted, the policy does not provide a clear basis for consistent decision-making. They are concerned that 'uncertainty' of effect attaches to almost every proposal to some extent. It is not, for that reason, a sound basis for the control of development.

2. PPW (paragraph 2.2.1) presents the principles which underpin the approach of WAG to the formulation of planning policy for sustainable development. One of these is the 'precautionary principle' which is amplified by the explanation that cost-effective measures to prevent possibly serious environmental damage should not be postponed just because of scientific uncertainty about how serious the risk is.

3. An example of the application of this principle in practice might be the approach to the control of development in areas at risk of marine flooding. The scientific debate on the extent to which sea levels might rise, the rate at which that might proceed and the frequency of flood events in particular places is a vigorously contested one. Despite the lack of scientific certainty the planning system seeks to steer development of different levels of vulnerability to flooding away from areas which are exposed to various degrees of risk.

4. PPW (paragraph 2.2.1) therefore gives support to a policy approach by which decisions can be taken to refuse planning permission in the absence of conclusive evidence as to the seriousness of the risk. The LPA proposes, via NA 43, to change the wording of Policy A3. This would provide for the refusal of planning applications if there is a possibility of serious or irreversible damage to the environment or the community unless it can be shown without doubt by an appropriate impact assessment, that the impact can be negated or mitigated. The related NA 394 presents details of the relevant assessments.

5. I consider that Policy A3, as subject to NA 43, takes the basic approach of WAG policy and modifies it so that it can be effectively applied via the Town and Country Planning system. Rather than taking a decision (perhaps to refuse planning permission) simply because the extent of an identified risk is uncertain, it provides the scope for the developer to demonstrate that the impact can be negated or mitigated in the particular circumstances of the site and the details of the development scheme. For this reason I conclude that NA 43 maximises the scope for development to proceed in the circumstances of constraint envisaged by PPW.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0077) that the DD be modified by the acceptance of NA 43;**

**(REC.0078) that no other modification be made to the DD in response to these objections.**



**GENERAL – SECTION A**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA35; NA36; NA37; NA38

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/31</b>	<b>Environment Watch &amp; the Borders</b>		

## SECTION A - NEW POLICIES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/76/34	Mike Webb (RSPB)		348

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and guidance.

### Inspector's Considerations and Conclusions

1. The objector argues that the UDP should contain a policy that the LPA will, within a year of the adoption of the plan, prepare Supplementary Planning Guidance for use in the determination of planning applications which have an impact on biodiversity. Unitary Development Plans – Wales (paragraph 2.8) advises that UDP policies should not include statements of intent or descriptions of administrative arrangements. It is not, therefore, appropriate to modify the plan in the way sought by the objector.

### RECOMMENDATION

**I recommend:**

**(REC.0079) that no modification be made to the DD in response to this objection.**

## MONITORING

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA44; NA45

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/783/3	Welsh Language Board		321

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/47	Welsh Assembly Government		321
B/734/48	Welsh Assembly Government		321

### Main Issue

- Whether the DD is appropriate, having regard to the effectiveness of the provision made for monitoring.

### Inspector's Considerations and Conclusions

1. The DD, in section 2.3, presents the policy performance indicator for Policies A1 to A3 as the % of Welsh speakers in Community Council areas. This is related to the target that there should be no reduction in the proportion of Welsh speakers within these areas (compared to 2001) as a result of development. An objector argues that there can be a number of reasons why the proportion of Welsh speakers might change over time and development is only one of them. The LPA agrees and, in response, proposes via NA 44 to change the indicator to the % of Welsh immigrants in Community Council areas. Since immigration is related, to some extent, to the increased opportunities for residency that are provided by the development process this would be a more sensitive indicator.

2. However, as published, NA 44 refers simply to the percentage of Welsh immigrants in Community Council areas. Such persons might or might not speak Welsh. This indicator would, therefore, be of no value. It is necessary to modify the text of NA 44 to achieve the objective stated in LPA proof 321, paragraph 4.1.

3. The same objector suggests that there is merit in establishing cross-references between the performance indicators to draw attention to those which are presented in other parts of the plan which are relevant to the Precautionary Approach. Unitary Development Plans – Wales (paragraph 2.8) advises that policies must not be long, complex or over-detailed. The UDP has been drafted on

the basis that it is to be read as a whole. The objector's suggestion would introduce a measure of complexity to the document to no good purpose.

4. An objector argues that it would be appropriate to add the Welsh Language Board to the list of key partners because that is the statutory body responsible for promoting the use of the Welsh language. The LPA agrees and proposes to secure this via NA 45. I conclude that this would ensure that a high quality of advice is available to support both the formulation of policy and its monitoring.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0080) that the DD be modified by the acceptance of NA 44, subject to the policy performance indicator being worded as 'the % of Welsh speaking incomers into Community Council areas';**

**(REC.0081) that the DD be modified by the acceptance of NA 45;**

**(REC.0082) that no other modification be made to the DD in response to these objections.**

**OBJECTIONS TO CHAPTER 'B'**

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA46; NA47

This Section is subject to Further Proposed Changes Nos: NAP74

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/33	Environment Watch Wales & the Borders		129
B/866/12	Snowdonia National Park		646

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/776/22	Environment Agency Wales		311
B/776/23	Environment Agency Wales		311

### Note

- In addition to the above representations I have also taken into account objection B/726/3.

### Main Issues

- Freshwater ecosystems and water corridors.
- Whether the Introduction should refer to the Snowdonia National Park.
- Whether 'water saving' should be identified as a sustainable development technique.
- How should 'risk' be described in relation to the Plan's objectives.
- Risk to property from flooding.

### Inspector's Considerations and Conclusions

#### *Freshwater ecosystems and water corridors*

1. In relation to the introductory paragraph to the strategic policies of the Chapter the objector considers that specific reference should be made to the need to protect freshwater ecosystems and river/water corridors. Given the general nature of its context, I agree with the Council that the paragraph adequately covers the specific matters of concern within its general aim of protecting the environment and safeguarding valuable resources. To refer to specific features of

the environment would introduce an unnecessary level of detail and thus I conclude that no further change is required in this respect.

*Whether the Introduction should refer to the Snowdonia National Park*

2. The Council agrees with the objector that greater prominence should be given within the Plan to the need to have regard to the purposes of the National Park. I concur with the Council that the most appropriate way of doing so is not by referring to it within the introductory section of this chapter, but rather, to include it as a specific policy. This is addressed in my section of the report dealing with the 'New Policies' of this chapter.

*Whether 'water saving' should be identified as a sustainable development technique*

3. The importance of water conservation in terms of sustainability is acknowledged in the additions to paragraph 3.1.15 introduced by NA 46. This corrects the failure of the Deposit Draft version to highlight this matter and is a change that ought to be incorporated in the Plan.

*How should 'risk' be described in relation to the Plan's objectives*

4. The Council accepts that it is more appropriate for the Plan's objective, as set out in the final bullet point of paragraph 3.1.22, to refer "unacceptable risk" rather than "substantial or unnecessary risk". Contrary to the Council's assertion this is only partly addressed by NA 47 as the original description of risk is not altered in relation to the second time that it is used. I have assumed this to be an error that will be corrected at the proposed modification stage.

*Risk to property from flooding should be acknowledged*

5. The Council proposes a Further Proposed Change, NAP 74, to deal with this objection. Although it has not been the subject of public consultation, as it merely adds detail to the explanatory text, I see no reason not to incorporate it within the Plan. In any event, this change will be subject to full consultation as part of the proposed modifications procedure – any representations received at that stage would need to be carefully considered.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0083) that the DD be modified by the acceptance of NA 46;**

**(REC.0084) that the DD be modified by the acceptance of NA 47 as further amended by deleting "substantial or unnecessary" from the penultimate line of NA 47 and replacing it with "unacceptable";**

**(REC.0085) that the DD be modified by the acceptance of NAP 74;**

**(REC.0086) that no other modification be made to the DD in response to these objections.**

### 3.1 INTRODUCTION – CONSERVATION AREAS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

#### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/12	Gwynedd Archaeological Trust		355

#### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/17	Sustainable Gwynedd Gynladwy		

#### Main Issue

- Designation of additional rural conservation areas.

#### Inspector's Considerations and Conclusions

1. In relation to the introductory paragraph to conservation areas, the objector suggests that the Council should consider designating more rural conservation areas. There is a separate formal procedure for designating conservation areas which includes a requirement for public consultation. Thus, as the Council points out, the UDP is not the appropriate mechanism for designating new conservation areas. Moreover, as paragraph 2.8 of Unitary Development Plans Wales points out policies should not include statements of intent. I conclude that that no change to the Plan is necessary in response to this objection.

#### RECOMMENDATION

I recommend:

**(REC.0087) that no modification be made to the DD in response to this objection.**



## POLICY B1 – DEMOLITION OF LISTED BUILDINGS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 48; NA 49

This Section is subject to Further Proposed Changes Nos: NAP11; NAP12

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/49	Welsh Assembly Government		326
B/1030/3	University of Wales Bangor	Sian Kilner	326

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/4	CPRW		326
B/790/11	Gwynedd Archaeological Trust		326

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/15	Sustainable Gwynedd Gynladwy		326

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/734/2200	Welsh Assembly Government		326

### Note

- The Council has suggested 2 Further Proposed Changes to this Policy. Given the nature of these changes I have taken them into account in my assessment of the Policy, but I am mindful that they have yet to be subject to public consultation. Any comments received during the proposed modification stage will need to be carefully considered by the Council. NAP 12 refers to "private applications" as well as "Grade 11". The latter appears

to be a typographical error which ought to read "Grade II" and should be corrected at the proposed modifications stage. The precise meaning of the former in its context is not clear to me, and indeed appears to be superfluous.

## Main Issues

- The role of Cadw in the listed building consent process.
- The requirement that all listed buildings to be demolished are recorded.
- Should Criterion 3 be re-worded.
- Mode of expression.

## Inspector's Considerations and Conclusions

### *The role of Cadw in the listed building consent process*

1. Footnote ? which appears after the explanatory text to B1 provides a brief explanation of the listed buildings regime, including the role played by Cadw. As this note deals with the general matter of listed buildings rather than only matters relating to the *demolition* of such buildings (which is the subject of Policy B1) I suggest that this note would be better placed beneath the generic heading of "Listed Buildings" which immediately precedes B1.

2. In the Deposit Draft version, footnote ? erroneously suggests that Cadw grants permission for works affecting listed buildings; this is corrected by NA 49. NAP 12 introduces a further amendment in relation to the role of Cadw, which reflects the recent changes in the relationship between Cadw and WAG. Rather than stating that listed buildings are included on Cadw's register, it explains that the register is administered by Cadw on behalf of WAG. These changes better reflect the role of Cadw in the administration of listed building protection. NAP 12 also explains that a copy of the listed buildings register can be viewed via the Council. These changes provide helpful and more accurate information which ought to be incorporated into the Plan.

3. As an addition at the end of the footnote, NA 49 introduces an undertaking that the Council will notify Cadw of its decision "in connection with specific cases". This is further amended by NAP 12 so that "specific cases" is replaced by a more detailed description, but this does not properly reflect the circumstances as set out in paragraph 15 of Circular 1/98. It seems to me that the notification procedure could be explained in more succinctly and accurately. It should inform that, other than in circumstances where WAG specifically directs that a notification is not required, which is currently set out in paragraph 15 of Circular 1/98, the Council is required to notify Cadw of its intention to grant listed building consent. This approach would not only avoid the potential for misrepresenting the WAG direction, but also ensures that in the event of a new direction being issued, the Plan does not become out-of-date. The text should also make it clear that rather than notifying Cadw of their *decision*, a local planning authority is required to notify Cadw of its *intention* to grant consent.

### *The requirement that all listed buildings to be demolished are recorded*

4. Paragraph 6.2.1 of PPW sets out the requirement for local planning authorities to notify the Royal Commission of all proposals to demolish listed

buildings. This provides the opportunity for the Commission to record the building prior to demolition. NA 48 corrects the failure of the Deposit Draft to refer to this notification procedure, but it goes one step further in requiring that all such buildings "must" be recorded by the Commission. Such a requirement is unreasonable and unnecessary. This is recognised by the Council and has resulted in a further change, NAP 11, which requires that the Commission is notified of applications for the demolition of a listed building and is allowed access to the building to undertake any recording prior to its demolition. Such a requirement is reasonable and aligns with the provisions of paragraph 13 of Circular 1/98 and paragraph 105 of Circular 61/96 which detail the arrangements that enable such recording to take place.

5. No reference is made to cases of partial demolition, even though the opening line of the Policy refers to "total or substantial demolition". It is suggested that the reference to "substantial" be altered to the more refined term of "significant". To ensure that the Policy aligns with national policy it is suggested that the reference to "all proposals to demolish listed buildings" is replaced with "all proposals for the total or significant demolition of listed buildings". A footnote denotation should then follow creating a link to a note explaining what is meant by 'significant' as "alterations that entail the loss of significant evidence of its structural history or materially affects its special architectural or historic interest". This reflects the guidance in paragraph 13 of Circular 1/98.

6. The reference to "exceptional circumstances" which is proposed by NA 48 is ambiguous. The intention appears to be that it explains that the demolition of listed buildings will only be permitted in exceptional circumstances. The sentence is capable of being construed as meaning that conditions will only be attached to permission in exceptional circumstances. A minor redrafting is required along the lines set out in my recommendations below and which also replaces the reference to "permission" with "consent" given that authorisation for such work is termed 'listed building consent'.

*Should Criterion 3 be re-worded*

7. This criterion requires that every effort has been made to dispose of the building at a reasonable price and that such efforts have been undertaken for a two year period without success. Whilst I appreciate that this provides clear guidance against which to assess applications, the Council has not provided evidence to justify that such a requirement should be a pre-requisite in all cases involving the demolition of listed buildings. As the objector points out there may be cases where the disposal of one building within a larger site or complex of buildings may be impractical or undesirable in terms of the 'bigger picture'. Moreover, the seemingly arbitrary 2 year period for marketing the property may jeopardise a redevelopment scheme that would meet the requirements of criterion 5 (that recognises situations in which community benefits override the need to retain the building).

8. Whilst I consider that the Policy's approach of identifying the numerous factors that need to be assessed in determining whether a building should be retained is a reasonable alternative to the more general form of wording suggested by the objector, criterion 3 should be amended so as to avoid being too prescriptive. It seems that evidence of a genuine but unsuccessful attempt to dispose of the property, or to demonstrate that disposal would be inappropriate, would be an appropriate third criterion.

9. There is a contradiction within the Policy given that it requires that "clear evidence" is provided of all 5 criteria, but that the first 4 criteria are concerned with the practicality of retaining the building whereas the 5<sup>th</sup> criterion allows a situation where other considerations can override the need to retain it. This confusion could be avoided by replacing the second sentence of the Policy, "Such proposals need to provide clear evidence of the following:" with "Such proposals will be assessed against the following criteria:".

*Mode of Expression*

10. The extent of changes to this Policy proposed by the Council via NA 48 and 49 and as further altered by NAP 11 and 12 is testimony to its acceptance of the need to significantly alter the DD. Generally these changes represent a significant step in the right direction. Nevertheless, for reasons I set out in my assessment of the preceding main issues, there are further changes that are necessary. In the interests of clarity, rather than seeking to adapt the Council's inadequate intermediate text, I shall set the Pre-inquiry and Further Proposed Change versions of the Policy to one side and recommend changes to the DD version. NAP 11 represents an exception to this general approach.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0088) that the DD be modified by deleting from the opening sentence of the Policy the reference to "substantial" and replacement with "significant", and that in the same sentence a new footnote reference number should be inserted after "demolition". A new footnote should be added after paragraph 3.2.2 and should explain that what is meant by 'significant' is "alterations that entail the loss of significant evidence of its structural history or materially affects its special architectural or historic interest";**

**(REC.0089) that the DD be modified by deleting the second sentence of the Policy, which reads "Such proposals will need to provide clear evidence of all the following:", and replacement with "Such proposals will be assessed against the following criteria:" inserted;**

**(REC.0090) that the DD be modified by the deletion of criterion 3 in its entirety and replacement with "that either every effort has been made over a reasonable period to dispose of the property at a fair price and that this has been unsuccessful, or that such disposal would be inappropriate;";**

**(REC.0091) that the DD be modified by the deletion from the opening sentence of the final paragraph of the Policy of "If permission is very occasionally granted" and replacement with "In circumstances where consent is granted", and that the further references to "permission" that appear in the same paragraph and in the supporting text is replaced with "consent";**

**(REC.0092) that the DD be modified by the acceptance of NAP 11 with a further alteration such that the reference to “all proposals to demolish listed buildings” be replaced with “all proposals for the total or significant demolition of listed buildings”;**

**(REC.0093) that the DD be modified by incorporating the following changes to the footnote to the Policy:**

- **To incorporate the changes proposed by NAP 12 but only insofar as it relates to the first 2 sentences of the footnote;**
- **At the end of the footnote should be inserted an explanation that the Council is required to notify Cadw of its intention to grant listed building consent other than for certain works where WAG has expressly directed, currently by means of paragraph 15 of Circular 1/98, that such notification is not necessary;**

**(REC.0094) that the DD be modified by the repositioning of the footnote to the Policy such that it is inserted immediately below the main heading “LISTED BUILDINGS” which precedes the heading to Policy B1, and to move the footnote link (?) to the main title instead of after “listed Buildings” in the opening line of the Policy;**

**(REC.0095) that no other modification be made to the DD in response to these objections, and in particular that NA 48 and 49 and NAP 12 be not accepted.**

**POLICY B2 – ALTERATIONS TO LISTED BUILDINGS OR BUILDINGS  
IN THEIR CURTILAGE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/16</b>	<b>Sustainable Gwynedd Gynladwy</b>		

**POLICY B4 – DEVELOPMENTS IN OR AFFECTING THE SETTING OF CONSERVATION AREAS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/18</b>	<b>Sustainable Gwynedd Gynladwy</b>		

## POLICY B5 – DEMOLITION OF BUILDINGS IN CONSERVATION AREAS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 50

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/13	Gwynedd Archaeological Trust		618

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/19	Sustainable Gwynedd Gynladwy		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/734/2201	Welsh Assembly Government		618

### Note

- Although not identified in the box heading above, the Council has produced a Further Proposed Change to this Policy, NAP 118, which I have taken into account.

### Main Issue

- The recording of buildings to be demolished within conservation areas

### Inspector's Considerations and Conclusions

1. The Policy is concerned with buildings that make a positive contribution to a conservation area. The Deposit Draft version of the Plan does not include any reference to the need to record buildings that are to be demolished within conservation areas. In response to an objection, NA 50 is proposed requiring that a "detailed record of such buildings will be required prior to demolition". In introducing Further Proposed Change NAP 118 the Council accepts that such a blanket approach to buildings within conservation areas is not justified. The further change refines NA 50 by limiting the need to record buildings to those



identified in a conservation area appraisal as important to the character and appearance of the conservation area.

2. Government policy, as described in the section of my report dealing with the demolition of listed buildings (Policy B1) recognises the need to provide an opportunity for the Royal Commission to record such buildings prior to their demolition. There is no such provision for non-listed buildings within conservation areas. Not only does the proposed introduction of such a requirement raise the question of who would undertake the recording but also the justification for such a requirement.

3. Procedures for consent to demolish a building within a conservation area are essentially the same as listed building consent applications but there is an important difference in terms of their significance. Paragraph 48 of Welsh Office Circular 61/96, Planning and the Historic Environment: Historic Buildings and Conservation Areas, informs that a building within a conservation area does not enjoy the full protection of statutory listing. In broad terms, whereas listed buildings will usually have a national significance the importance of other buildings within conservation areas will be their contribution to their setting and the conservation area as a whole. Threatened non-listed buildings that are found to possess particular architectural or historic significance can be the subject of spot listing or building preservation notices and can be added to the statutory list. I conclude that there is no justification for requiring the recording of non-listed buildings in cases where consent has been granted for their demolition.

## **RECOMMENDATION**

**I recommend:**

**(REC.0096) that no modification be made to the DD in response to these objections, and in particular that NA 50 and NAP 118 be not accepted.**

**POLICY B6 – CAERNARFON CASTLE AND TOWN WALLS WORLD HERITAGE SITE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 51

This Section is subject to Further Proposed Changes Nos: NAP9

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/14	Gwynedd Archaeological Trust		3

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/56	CPRW		619

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/567/2004	Caernarfon Civic Society		3
B/790/2032	Gwynedd Archaeological Trust		3

**Notes**

- Objections B/567/2004 and B/790/14 are concerned with site specific proposal (car park at Coed Helen and the redevelopment site at the slate quay, respectively) and I have dealt with them in the sections of my report that deal with those sites.
- The effect of NAP 9 would be to reduce the spatial area covered by this Policy. The reason for doing so has not been made clear to me and the change has not been the subject of formal public consultation. In the circumstances I am unable to make an informed recommendation on this envisaged substantive change to the DD. If the Council remains of the view that such a change is suitable it can expose it to public scrutiny through the proposed modifications process.

## Main Issue

- World Heritage Site Management Plan produced by Cadw.

## Inspector's Considerations and Conclusions

1. The Council accepts that the management plan that has been produced by Cadw is an important consideration in terms of assessing proposals that could affect the Caernarfon Castle and Town Walls World Heritage Site, and this is reflected in the Pre-inquiry Proposed Change NA 51 which makes specific reference to the management plan. Whilst I agree that this reference is appropriate I consider that the term "thorough consideration" ought to be changed. Not only is the word "thorough" superfluous in this context, but "consideration" fails to provide a clear indication that it would influence decision making; I suggest that the final sentence is re-phrased along the lines of "Planning applications will be assessed against the World Heritage Site Management Plan published by Cadw". The introduction of a specific reference to 'Cadw' would add precision to the Plan in terms of identifying the Management Plan in question.

## RECOMMENDATION

**I recommend:**

**(REC.0097) that the DD be modified by the acceptance of NA 51 and, to further amend by re-wording, the final sentence of the Policy to read "Planning applications will be assessed against the World Heritage Site Management Plan published by Cadw";**

**(REC.0098) that no other modification be made to the DD in response to these objections and, in particular, that NAP 9 be not accepted.**

## INTRODUCTION – ARCHAEOLOGICAL REMAINS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/50	Welsh Assembly Government		615

#### Note

- This objection is dealt with in the section of the report on Policy B7.

## POLICY B7 – SITES OF ARCHAEOLOGICAL IMPORTANCE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 52; NA53

This Section is subject to Further Proposed Changes Nos: NAP100

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/953/1	RMC Northen	Jo Davies	620
B/1034/6	Welsh National Trust		620

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/50	Welsh Assembly Government		620

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/790/15	Gwynedd Archaeological Trust		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/790/2033	Gwynedd Archaeological Trust		620

### Main Issues

- The approach to preservation in situ.
- Safeguards against damaging educational or tourist use of archaeological sites.
- The extent and purpose of, and need for, an archaeological assessment/field evaluation.

## Inspector's Considerations and Conclusions

### *The approach to preservation in situ*

1. In response to an objection, NA 52 amends the Policy to provide that, where preservation in situ is not feasible, mechanisms to secure the excavation and recording of remains will be used. As this change is consistent with the approach in PPW it should be incorporated into the Plan. NA 52 also addresses another point raised by the objector by qualifying the need to preserve remains in situ only where the remains are "important". I concur with this change but consider that it should be further refined to "nationally important" in line with the term used in PPW. It also seems to me that the term "will have an adverse impact" that immediately precedes "important" could be more clearly expressed in more neutral terms and in the conditional tense – "would affect".

### *Safeguards against damaging educational or tourist use of archaeological sites*

2. By requiring facilities that manage and interpret archaeological remains to be "appropriate" NA 52 introduces a safeguard against potentially damaging educational or tourist uses, thereby. In my view this change satisfactorily addresses the concern raised by an objector and should be incorporated in the Policy.

### *The extent and purpose of, and need for, an archaeological assessment/field evaluation*

3. An objector considers that further clarification is needed in respect of the "assessment/evaluation". PPW recognises that, in cases where important remains are thought to exist, a prospective developer should be requested to arrange for an archaeological field evaluation prior to the determination of a planning application. A definition of an archaeological assessment is introduced as an Appendix by NA 394. It seems to me that a cross-reference to the appendix would assist the reader of this Policy and that, in the interests of conciseness, the addition of a brief description of an archaeological assessment proposed by NA 53 is not necessary. However, in order to avoid confusion the terminology used in the Policy and the Appendix should be consistent – the failure of the Appendix to define the term "assessment/evaluation" which appears several times in the Policy should be addressed. It seems to me that NAP 100 fails to add to the effect of the opening sentence of the same paragraph and as such adds unnecessarily to length of the Plan. That opening sentence to paragraph 3.2.18 lacks clarity. For that reason and to follow national policy I consider that it should be reworded as set out in my recommendations below.

## RECOMMENDATIONS

### **I recommend:**

**(REC.0099) that the DD be modified by the acceptance of NA 52 as further amended by the deletion of "will have an adverse impact on important" and replacement with "would affect nationally important";**

**(REC.0100) that the DD be modified by the deletion in its entirety of the opening sentence of paragraph 3.2.18 and its replacement with "If**

important remains are thought to exist on a development site any planning application for development which may affect such remains should be accompanied by an archaeological assessment and/or field evaluation", and that a cross-reference should be inserted within the paragraph to the definition of these as set out in the Appendix to the Plan;

(REC.0101) that no other modification be made to the DD in response to these objections and, in particular, that NA 53 and NAP 100 be not accepted.

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/866/12	Snowdonia National Park		323

### Note

- Objection B/866/12 is dealt with under my section of the report dealing with Chapter B 'New Policies'. I have taken the above reference to "Response Ref 323" to be in error.



**POLICY B8 – THE LLYN AND ANGLESEY AREAS OF OUTSTANDING NATURAL BEAUTY (AONB)**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA54; NA55

This Section is subject to Further Proposed Changes Nos: NAP110

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/245/5	Gwynne Morris Jones (CPRW)		195
B/760/7	CCW		202
B/760/4	CCW		202
B/760/5	CCW		202
B/760/6	CCW		202

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/51	Welsh Assembly Government		202

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/1034/7	Wales National Trust		
B/773/6	North Wales Wildlife Trust		

**Objections to Pre-inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1492/2006	David J Roberts		202

**Notes**

- B/760/6 is recorded as an objection, however as it is limited to an expression of the objectors expectation of being consulted over any future changes to the boundary of the AONB, which is not within the remit of this Plan, I have not commented upon it.
- I have treated the Response Reference 195 quoted above to be in error; it ought to read 197.

- The precise intention of NA 54 insofar as its effect on the original wording of the Policy is not clear – subject to minor revision, the opening line of the Deposit Draft of the Policy is set out in the PIC version whereas the remainder of that paragraph and the following 3 criteria are not shown. On the basis that the following paragraph is shown to be deleted I have assumed that the preceding text, despite not being shown, is to remain and have dealt with the Policy on this basis.
- Reference is made to NAP 110 in the above box heading but no mention of this change is made in the Council's Proofs of Evidence. Despite having examined NAP 110 as it appears in the Council's Schedule of Further Proposed Changes I am unable to ascertain the nature of the proposed change/s.

### **Main Issues**

- Does the Policy give sufficiently clear guidance for prospective developers.
- Does the Policy adequately safeguard the Anglesey AONB.
- Should the boundary of the area where this Policy applies be shown in relation to the Anglesey AONB.
- Whether the Policy should expand upon the role of the AONB management plan.

### **Inspector's Considerations and Conclusions**

#### *Does the Policy give sufficiently clear guidance for prospective developers*

1. In the Deposit Draft version the final sentence of the Policy requires all development to complement the character of the area, whereas the supporting text, paragraph 3.3.5, informs that the Council "will aim to ensure that development complements the Area's character and has the least possible impact". The change introduced by NA 54 not only better explains what is expected of prospective developers but also enables the decision maker to adopt a less restrictive approach to new development in appropriate cases, for instance where it could result in a benefit to the economic or social well-being of the Area. Such considerations are identified in PPW as important within AONBs, notwithstanding that the primary objective is the conservation and enhancement of their natural beauty.

#### *Does the Policy adequately safeguard the setting of the Anglesey AONB*

2. PPW confirms that the statutory duty to have regard to AONB purposes applies to activities affecting these areas, whether the activities are within or outside the designated areas. NA 55, emphasises the need to protect the Anglesey AONB and, in the case of development which could impact on views to or from it, provides an undertaking that the Council will consult with the neighbouring local planning authority. The insertion of this Pre-inquiry Proposed Change within the supporting text rather than as part of the Policy aligns with the advice in Unitary Development Plans Wales on administrative arrangements and on concise policies. However, rather than referring to land which is "adjacent" to an AONB, which is unduly restrictive, it is suggested that "near" is a more appropriate term. To improve the grammar of the opening line, "that is visually prominent, or has a detrimental effect" should be changed to "that would be visually prominent or

would have a detrimental effect". In the third sentence, the "for" in "before a decision is made for a planning application" should be replaced with "on".

3. In its amended form the Policy and supporting text provide appropriate protection to sensitive areas near both AONBs; it will be for the decision maker to apply the Policy appropriately in relation to individual proposals, taking into account all relevant Plan policies and any other material considerations.

*Should the boundary of the area where this Policy applies be shown in relation to the Anglesey AONB*

4. Whilst the Plan identifies the physical boundaries of the AONB designation that lies within the Plan area it is not necessary to show any designations that lie outside the Plan area. Although the Policy also deals with land which lies outside but in close proximity to the AONBs it is not practical to identify such areas in relation to either the Llyn or Anglesey AONBs. A decision on whether a particular proposed development would affect the setting of such a designated area would have to be made on a case-by-case basis.

*Whether the Policy should expand upon the role of the AONB management plan*

5. In response to an objection, NA 54 usefully informs the reader that the Management Plan for the Llyn AONB will be an important consideration.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0102) that the DD be modified by the acceptance of NA 54 (on the basis of my understanding of its intention as described in the above 'Notes');**

**(REC.0103) that the DD be modified by the acceptance of NA 55 as further amended to conform to my conclusions in paragraph 2;**

**(REC.0104) that no other modification be made to the DD in response to these objections and, in particular, that NAP 100 be not accepted.**

## POLICY B9 – HERITAGE COAST

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA56

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1034/8	Wales National Trust		310

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/5	CPRW		310

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/773/7	North Wales Wildlife Trust		310
B/726/14	Tom Brooks		310

### Notes

- This section should be read in conjunction with the section on Policy B13.
- NA 56 contains a typographical error in the spelling of “coastal” in criterion 1 which should be corrected at proposed modifications stage.

### Main Issue

- Should the Policy steer coastal developments away from undeveloped parts of the Heritage Coast.

### Inspector’s Considerations and Conclusions

1. NA 56 introduces 3 criteria against which to assess development within the Heritage Coast. TAN 14, ‘Coastal Planning’, explains that Heritage Coasts are primarily designated for the quality of their coastal landscape. On this basis it seems appropriate that the Plan seeks to steer new development away from it. Criterion 1 provides that a coastal location is necessary, and a similar provision is contained in Policy B13, which deals with the open coastline outside the Heritage Coast (see comment on the wording introduced by NA 62 in my report on B13). Criterion 3 is that “priority is given to previously developed locations”. The basis for this criterion is not clear; on the assumption that it seeks to protect the character and appearance of the area it seems to me that this criterion should be

changed along the lines that "priority will be given to locations that are visually well related to existing buildings or structures".

2. In order to establish a hierarchy within the undeveloped coastline, which is hitherto absent, it seems to me that the Policy should include another criterion: "there are no suitable locations outside the Heritage Coast". At present there appears to be little difference in terms of the tests to be applied by Policy B9 to those relevant to the remainder of the undeveloped coastline imposed by B13. These suggested changes would more fully meet both objections than that set out in Pre-inquiry Proposed Change.

3. For reasons given in relation to B13 I suggest that consideration should be paid to amalgamating B9 and B13 into a single policy, whilst maintaining the differentiation between the Heritage Coast and other areas of open coastline. Alternatively both policies could remain as discrete entities but that greater consistency in the wording of the criteria, where appropriate, should be achieved together with a clearer distinction between the level of protection afforded to the two areas.

## **RECOMMENDATIONS**

**I recommend:**

**EITHER - (REC.0105) that the DD be modified by the acceptance of NA 56 and the following further amendments:**

- **the deletion from criterion 1 of "costal" and replace with "coastal";**
- **the deletion of criterion 3 in NA 56 and to replace with "priority will be given to locations that are visually well related to existing buildings or structures"**
- **the addition of a further criterion along the lines of "there are no suitable locations outside the Heritage Coast";**

**OR - (REC.0106) that the DD be modified by re-writing the criteria so as to ensure that, other than is necessary to ensure that the Heritage Coast enjoys the greatest level of protection, that there is general consistency in the content and wording of the criteria set out in B9 and B13, including the amendments that I suggest in the first recommendation above;**

**OR - (REC.0107) that the DD be modified by amalgamating Policies B9 and B13 into one policy that would provide the safeguards against inessential or harmful development set out in the criteria listed in B9 as modified by the changes suggested in the first recommendation above, and which would afford the greatest protection to the Heritage Coast;**

**(REC.0108) that no other modification be made to the DD in response to these objections.**

**POLICY B10 – PROTECTING AND ENHANCING LANDSCAPE CONSERVATION AREAS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA57; NA58; NA59; NA376

This Section is subject to Further Proposed Changes Nos: NAP69

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/765/1	Dominique Sammut		195
B/760/10	CCW		195
B/245/4	Gwynne Morris Jones (CPRW)		195
B/563/1	John Richard Jones		195
B/566/1	Terry Brown		195
B/560/1	J Jeremy Jones		195
B/1341/4	Dr Sheila Roberts		195
B/874/1	Peter Marston		195 & 201
B/880/1	Dr Sheila Roberts - Welsh Historic Gardens Trust		195
B/720/1	Snowdonia Society		195
B/760/9	CCW		195
B/953/3	RMC Northen	Jo Davies, RMC UK	195
B/935/1	Mr & Mrs A Davies		137

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/52	Welsh Assembly Government		195
B/562/1	Michael Roberts		195
B/565/1	Patricia Ann Brown		195
B/564/1	AJ Underwood		195
B/559/1	Genevieve Singabryen		195
B/558/1	AE Pennell		195
B/844/51	CPRW		616

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref

B/773/8	Chris Wynne (North Wales Wildlife Trust)		
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### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/765/2004	Dominique Sammut		195
B/1492/2003	David J Roberts		195
B/867/2030	House Builders Federation		195
B/1621/2004	Corinne Vanderzijl		195
B/1625/2001	Jill Turner		195
B/734/2213	Welsh Assembly Government		195
B/1448//2004	Robert Gray Williams		195
B/1433/2005	Penny Perrin		195
B/756/2087	Environment Watch Wales & the Borders		166
B/880/2007	Dr Sheila Roberts		195
B/1646/2001	John Briggs		195
B/790/2034	Gwynedd Archaeological Trust		195
B/559/2004	M. Singabryen		195
B/562/2005	Michael Roberts		195
B/564/2003	A. Underwood		195
B/558/2007	A. Pennell		195
B/952/2034	RCH Douglas Pennant		195
B/1492/2004	David J Roberts		201
B/765/2003	Dominique Sammut		195
B/1492/2005	David J Roberts		195
B/1433/2003	Penny Perrin		195
B/1448/2003	Robert Gray Williams		195
B/1621/2001	Corinne Vanderzijl		195
B/874/2005	Peter Marston		201
B/952/2035	RCH Douglas Pennant		617
B/1492/2001	David J Roberts		201

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name	Agent	Response Ref
B/558/2006	A.Pennell		
B/564/2004	A.Underwood		
B/559/2006	M.Singabryen		
B/562/2003	Michael Roberts		
B/880/2006	Dr Sheila Roberts		

<b>B/1621/2003</b>	<b>Corinne Vanderzijl</b>		
<b>B/1448/2005</b>	<b>Robert Gray Williams</b>		
<b>B/1433/2001</b>	<b>Penny Perrin</b>		
<b>B/1625/2003</b>	<b>Jill Turner</b>		
<b>B/834/2003</b>	<b>Rob Mimpriss</b>		
<b>B/765/2007</b>	<b>Dominique Sammut</b>		
<b>B/1034/2020</b>	<b>Wales National Trust</b>		

## Notes

- Pre-inquiry Proposed Change NA 376 is dealt with in the section of the report dealing with the Shores of the Menai Straits.
- The element of objection B/935/1 which is site-specific is dealt with in the section of the report relating to 'Landscape Conservation Area in the Glandon Area, Pwllheli'.
- Objection B/844/51 is dealt with in the section of the report relating to 'Landscape Conservation Area to the East of Bala'.
- Objection B/720/1 relates to the setting of the National Park, which is dealt with in the section on New Policies within Chapter B.
- Although not referred to above, I have taken into account the comments made in objection B/866/12 regarding Policy B10.
- Objections B/1492/2001 and 2004 include suggestions that the Menai Straits should be classified as an Area of Outstanding Natural Beauty and that the Plan should include a commitment to this effect. As the statutory designation of AONBs is not a matter for the UDP, nor is there need for the Plan to comment on the desirability of such a suggestion, I have not commented any further on this aspect of these objections.
- In the Council's Proof of Evidence 195 reference is made to objection B/245/5. As that objection is concerned with Policy B8 I have assumed the suffix to be a typographical error and that the reference should have been to B/245/4.
- The list of counter objections set out above is incomplete. In accordance with the list provided by the Council in its amended Proof of Evidence 195 I have also taken into account objections: B/245/2006, B/558/2005, B/559/2007, B/562/2004 and B/564/2005.

## Main Issues

- Does this landscape designation serve a useful purpose.
- Are the designations based on a sufficiently robust assessment.
- Should the Policy be more restrictive.
- Should the Policy include economic and social considerations in line with sustainability principles.
- Should the Policy require proposals to enhance the natural environment.
- Does the term "good" set an appropriate design standard.
- Should the Policy take into account the protection of the setting of the National Park, AONBs, Historic Landscapes, Parks and Gardens.
- Should the Policy be redrafted to simplify it and to improve clarity.
- Does the term Landscape Character Area create confusion.



## Inspector's Considerations and Conclusions

### *Does this landscape designation serve a useful purpose*

1. An objector suggests that the Policy should be deleted unless there is a justifiable difference between the way development is controlled within Landscape Conservation Areas (LCAs) compared with the situation within an AONB or within 'standard' rural areas. PPW expects non-statutory landscape designations to be soundly based on a formal scientific assessment – this is addressed in relation to my consideration of the second issue - and acknowledges that local non-statutory sites can add value to the planning process, particularly if the designations are informed by community participation and reflect community values. It also informs that local designations should be applied where there is 'good reason to believe that normal planning policies cannot provide the necessary protection'.

2. In my opinion the Policy will enable the effect of a proposed development on the landscape to be assessed against the particular attributes of the local landscape as described in the LANDMAP findings. This could usefully inform decisions on proposed developments, not only in terms of the sensitive siting of new development, but also in its design and landscaping. In this respect the Policy will heighten the awareness among prospective developers of the importance of landscape impact and guide developers to the LANDMAP assessment to gain a better understanding of the character of a particular area. For these reasons I consider that, in principle, the designation of areas as being of local landscape importance and the associated policy are appropriate elements of the Plan.

### *Are the designations based on a sufficiently robust assessment*

3. Objectors have queried the basis of the LANDMAP methodology, questioning whether it has been the subject to robust peer review. However, the CCW's LANDMAP information system methodology is recognised by PPW as an important information resource for local planning authorities in making landscape assessments, providing a consistent Wales-wide approach to landscape assessment. The Council explains that the LANDMAP assessment included a public consultation exercise. Although the objectors question the degree of public scrutiny and peer review of the methodology, no substantive evidence has been provided to suggest that the LANDMAP methodology is inherently unsuitable.

4. The Plan's LCA designations differ from those identified in the Gwynedd Structure Plan and in Local Plans even though objectors suggest that there has been no significant change in the landscape. However, this difference can be explained by the refinement of landscape assessment methodology, in line with national policy, over the intervening period. This has meant that a wider range of considerations are taken into account in the evaluation of landscape character with a reduced reliance on the visual aspect. These new designations must be assessed on their merits in the context of present approaches to landscape assessments and national policy, rather than on historical designations. The assessment process is on-going and in 2003 CCW introduced a refined methodology for LANDMAP which led the Council to commission a new Gwynedd Landscape Strategy Report. A draft version of the report dated March 2006 has been produced but no further proposed changes have been presented to the Inquiry in response.

5. In the absence of the Council's approval of the latest Landscape Strategy the approach used as a basis for the Deposit Draft designation of LCAs represents the best available methodology. The Council intends to review the LCA designations in the light of the revisions to the LANDMAP methodology and it appears likely that this will lead to recommendations to change the present LCA coverage. Whether any consequential changes that are required to the Plan are introduced at the proposed modification stage, at the first review of the Plan or in the preparation of a local development plan, is a matter for the Council to decide.

6. There has been an indication from the Council that it considers that it could not rely wholly on the LANDMAP methodology that informed the DD version designations of LCAs. At the PIC stage, and independently of any review of landscape assessment methodology, it resolved to include an area along the shores of the Menai Straits as a LCA despite the fact that the LANDMAP had specifically excluded the area as being worthy of such a designation.

7. In accord with the wishes of many local objectors the southern shore area of the Menai Straits was re-assessed in a manner that took into account the particular characteristics of the relatively narrow belt of land that follows the coast along the Menai Straits. As a general point I consider that, in exceptional circumstances, it can be appropriate to adopt an alternative approach to landscape assessment to the LANDMAP methodology in order to reflect an unusual local situation. However this must be justified by robust methodology. I have also borne in mind that, in this case, the Council's approach was informed by community participation in response to public consultation on the Plan. However, for reasons I set out in relation to the part of the report dealing with the Shores of the Menai Straits, I conclude that the designation of that area was not based on a robust methodology and, thus, is a flawed approach to landscape designation. It should not be pursued unless it can be supported by a proper scientific assessment.

*Should the Policy be more restrictive*

8. The Deposit Draft version is negatively worded and prevents development that would unacceptably impact on the landscape within LCAs. I agree with the Council's decision to change this negative approach at the Pre-inquiry Proposed Change stage. NA 57 permits development provided that all the criteria are met. NAP 69 deletes the last of these criteria and rephrases the remaining two. The Further Proposed Change seems to me to improve the Plan, but as it has not been the subject of full public consultation, any response received at the proposed modifications stage should be carefully considered.

9. Several objectors consider that the policy should be more restrictive, some argue that the degree of protection afforded by the UDP policy is less than in the previously adopted Plans. In my view, the approach taken in the latest version of the Policy is broadly acceptable and aligns with the latest national planning policy – PPW requires that non-statutory designations should not unduly restrict acceptable development. Matters relating to precise wording are dealt with in relation to other issues that I have identified and which are considered below.

*Should the Policy include economic and social considerations in line with sustainability principles*

10. I note that, in line with the comments of one objector, the Council in its Further Proposed Changes proposes to omit the reference to “economic desirability” on the basis that it is a matter adequately covered elsewhere in the Plan. However, in this respect I agree with another objector who suggests that, in relation to NA 57, the Policy should include a reference in its criteria to social as well as economic considerations. Such an approach would align with national policy which advises that development plans should make it clear that appropriate socio-economic activities are not precluded within non-statutory designations. This would address the concern of an objector fearful that the Policy could be used to prevent the provision of beneficial development, the example provided is that of housing to meet a particular local need. Thus another criterion should be added to NAP 69 – this criterion would effectively replace criterion 3 as set out in the PIC version which requires development to be of a small-scale, economically desirable and to have “the minimal impact practically possible on the environment”.

11. The requirement that development be small scale or economically desirable is unreasonable – scale should not necessarily be a determining factor, whilst economic desirability should not be a prerequisite, particularly in the case of development that may provide other benefits or development which causes no material harm to the landscape. The term ‘environment’ is too wide ranging in the context of this Policy which is concerned with one aspect, that of the visual quality of the landscape. The Plan contains a raft of other policies that seek to protect the various facets of the environment.

12. I agree with a suggestion from an objector that development which would lead to a harmful landscape impact should be justified on the grounds of economic or social desirability only where such a benefit is overriding. This would emphasise the particular importance attached to landscape considerations within LCAs and would represent a more appropriate test than merely establishing “a need” as suggested by an objector. The introduction of such a criterion would also require the Policy to be re-worded to state that “proposals will be assessed against the following criteria” rather than requiring that all the criteria are met. Such an approach would strike a better balance between landscape protection and socio-economic considerations. In reaching my findings on this matter I have noted the concerns expressed by objectors in relation to the Council’s handling of planning applications within areas of landscape sensitivity in the past.

13. It is right that the Policy is worded in such a way as to require the decision maker to strike an appropriate balance between interests that can be conflicting in determining individual planning applications. It is not possible or desirable for the Policy to attempt to be too prescriptive; inevitably sound judgement and difficult choices will be required in certain cases.

*Should the Policy require proposals to enhance the natural environment*

14. A requirement that development proposals in LCAs should have a positive effect on the natural environment would represent a higher test than national policy requires even in relation to statutorily designated sites. Such a requirement would be unreasonable and should not be included as a criterion. An objector suggests amending the requirement that development does not have an

"unacceptable impact" to "minimum impact". I consider that the changes introduced by NA 57 adequately address this point.

*Does the term "good" set an appropriate design standard*

15. Several objectors oppose the change introduced by NA 57 whereby "high" standard is replaced with "good" both in the Policy and the supporting text. It seems to me that this change should not lead to a downgrading of the standard of design that is expected. In this context "good" should not be interpreted on a scale that includes "high", rather it is used as a simple term that is the antithesis of 'bad'. The Council explains that the change in terminology has been prompted by the desire to reflect the use of the term 'good design' that appears in TAN12, and which indicates that WAG is committed to achieving good design in all development. I agree that this change avoids the confusion that would be created by introducing the term 'high' which could suggest the creation of a range of good designs, with an unjustifiable implication that a lower standard of design would be acceptable in areas outside LCAs.

*Should the Policy take into account the protection of the setting of the National Park, AONBs, Historic Landscapes, Parks and Gardens*

16. The DD version of the Policy affords particular protection to those parts of LCAs that affect the setting of the National Park or the Llyn AONB. The Pre-inquiry Proposed Change version deletes this reference. The setting of these statutorily designated sites is the subject of specific policies (within the amended version of the Plan Policy B8 deals with the setting of the Llyn and Anglesey AONBs, and a new policy deals with the setting of the National Park). Thus, it is unnecessary and potentially confusing to refer to the issue of the setting of these protected areas in B10. For the same reason a reference to historic landscapes, parks and gardens is not necessary given the effect of B12.

*Should the Policy be redrafted to simplify it and to improve clarity*

17. The Council has proposed Pre-inquiry Proposed Changes and a Further Proposed Change which seek to clarify the Policy. Other changes have been suggested by objectors. All these changes, unless already addressed in this section of the report are dealt with under this issue. It is suggested by an objector that the opening line of the Policy would be improved by the insertion of "only" so that "will be permitted" reads as "will only be permitted". This negative stance against development is not justified for the reasons set out earlier in this section. The deletion of "if" proposed by NAP 69 corrects a typographical error. The same NAP proposes the deletion of "disturb" from the first criterion. I consider this word to be unnecessary, its omission aids clarity as it leaves the decision maker to apply one test ie does the proposal "detract" from the positive features of the landscape. The omission of the clause "and those elements of it" improves the brevity of the criterion without detracting from its meaning. The same proposed change also introduces a re-worded second criterion which is simpler and more comprehensible than the Pre-inquiry Proposed Change version.

18. Objection is raised to the word "thorough" in relation to the consideration to be given to LANDMAP information, which appears in the final sentence of the Policy. In my view it is to be expected that where a policy requires that consideration is given to any matter that such consideration is 'thorough'. The

explicit reference to 'thorough' in this case could lead Plan users to conclude that where the need to give consideration is specified elsewhere in the Plan without this qualification, that the degree of consideration should be less than thorough, and indeed could be no more than superficial. It should be omitted.

19. NA 59 introduces the term "As a rule" at the start of the penultimate sentence of supporting paragraph 3.3.7. Given that the Planning Act requires the decision maker to take into account material considerations as well as the development plan it is not necessary to qualify policies or the supporting text with phrases such as "as a rule", "normally" or "usually". Where there are exceptional circumstances that justify departing from the stance set out in the plan this can be done on the basis of a material consideration without the need to overload the Plan with such terms.

*Does the term Landscape Character Area create confusion*

20. The term Landscape Character Area appears in the Landscape Strategy; it is not mentioned in any version of the Plan nor does there appear to be any intention to introduce such a term to describe a landscape designation.

## RECOMMENDATIONS

I recommend:

**(REC.0109) that the DD be modified by the acceptance of NA 57 as further amended by NAP 69 subject to the following:**

- that the first sentence of the Policy, which requires development proposals to meet all the listed criteria, should be deleted and replaced with an undertaking to assess all proposals against the identified criteria;
- that a third criterion be introduced to the Policy to indicate that any economic or social benefits will be taken into account and weighed against any harm that arises in relation to the first 2 criteria and that the supporting text is amended to include an indication that harm to the landscape would only be justified where the economic and/or social benefits are overriding;
- that "Thorough" is deleted from the beginning of the final sentence of the Policy and that the necessary capitalisation of the following 'C' to read "Consideration" is made;

**(REC.0110) that the DD be modified by the acceptance of NA 59 but only insofar as it relates to the deletion of "very high" and replacement with "good". The proposed addition of "As a rule" should not be incorporated into the Plan;**

**(REC.0111) that no other modification be made to the DD in response to these objections and, in particular, that NA 58 be not accepted (unless the designation of the 'Area along the Menai Straits' is soundly based on a formal scientific assessment).**

**POLICY B11 – OPEN SPACES BETWEEN OR IN VILLAGES OR TOWNS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/952/25</b>	<b>R.C.H. Douglas Pennant</b>	<b>Guy D. Evans</b>	<b>83</b>
<b>B/700/3</b>	<b>Church of Jesus Christ Latter day Saints</b>		<b>353</b>
<b>B/820/1</b>	<b>Lorna Margaret Todd</b>		<b>353</b>

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/773/9</b>	<b>North Wales Wildlife Trust</b>		<b>353</b>

**Notes**

- Objection B/820/1 offers general observations made in support of 4 site-specific objections relating to the failure of the Plan to designate particular sites in the Bethesda area as Protected Open Space. I have dealt with the matters raised under this objection within my consideration of the site-specific objections – these are set out in the section of my report dealing with 'Protected Open Space Sites'.
- Objection B/952/25 is addressed with Objection B/952/23 under 'North of Coetmor New Road' in the section of the report on 'Protected Open Space Sites'.
- Objection B/700/3 is addressed with Objection B/700/1 under 'Near Maes Gerddi, Porthmadog' in the section of the report on 'Protected Open Space Sites'.

**POLICY B12 – PROTECTING HISTORIC LANDSCAPES, PARKS AND GARDENS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA60; NA61

This Section is subject to Further Proposed Changes Nos: NAP86

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1214/1	Olive Horsfall (Welsh Historic Gardens Trust)		180

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/53	Welsh Assembly Government		317
B/1034/9	Wales National Trust		317
B/790/16	Gwynedd Archaeological Trust		317

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/844/6	CPRW		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/773/10	North Wales Wildlife Trust		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of objector	Agent	Response Ref
B/880/20 05	Dr Sheila Roberts		317

<b>B/790/20 35</b>	<b>Gwynedd Archaeological Trust</b>		<b>317</b>
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### Note

- Objection B/1214/1 relates to a site-specific concern and is dealt with under the section of my report on the employment land allocation at Parc Menai.

### Main Issues

- The area covered by the Policy.
- Whether the clarity of the Policy should be improved.
- Whether reference should be made to the ASIDOHL process.

### Inspector's Considerations and Conclusions

#### *Whether the area covered by the Policy should be re-defined*

1. The DD version refers to proposals "within or adjacent" to an identified historic park or garden. In response to an objection, NA 60 has been proposed which replaces "adjacent" with "sites visible from" the protected areas. This change enables proposals on sites that affect the setting of such parks and gardens even though they may not share a mutual boundary to be assessed against this Policy. An objection to the Pre-inquiry Proposed Change has been raised on the basis that it is too vague, preferring "within the essential setting of a park and garden". It seems to me that the amended version proposed by the Council is a sufficiently broad and easily understood term to warrant retention in the Plan.

#### *Whether the clarity of the Policy should be improved*

2. Minor changes in phraseology in NA 60 improve the clarity of the Welsh version of the Policy in line with the English version of the DD. The same Pre-inquiry Proposed Change replaces "effect" at the end of the Policy with "impact" which, in its context, is a more suitable term.

#### *Whether reference should be made to the ASIDOHL process*

3. The ASIDOHL process (described in NAP 86 as an 'Assessment of direct and indirect, physical effects on an area's historical features') provides a means of assessing the significance of proposed development on historic landscapes. The objector considers that reference ought to be made to this in the Plan. The Council agrees and introduces a reference to the process under NA 61 and corrects a minor omission through NAP 86. I consider that these changes improve the clarity of the Plan and ought to be incorporated.

### RECOMMENDATIONS

#### **I recommend:**

**(REC.0112) that the DD be modified by the acceptance of NA 60;**



**(REC.0113) that the DD be modified by the acceptance of NA 61 as amended by NAP 86;**

**(REC.0114) that no other modification be made to the DD in response to these objections.**

**POLICY B13 – PROTECTING THE OPEN COASTLINE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA62

This Section is subject to Further Proposed Changes Nos: NAP76

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1034/10	National Trust Wales		198

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/54	Welsh Assembly Government		

**Supporters of Deposit Draft**

Ref No	Name	Agent	Response Ref
B/726/15	Tom Brooks		
B/773/11	North Wales Wildlife Trust		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/765/2005	Dominique Sammut		195
B/1433/2006	Penny Perrin		193
B/559/2003	M Singabryen		193
B/558/2004	A Pennell		193
B/562/2007	Michael Roberts		193
B/564/2007	A Underwood		193

**Notes**

- Response references 195 and 198 quoted above are in error. The Council's response to all the above objections is contained in number 193.
- This section should be read in conjunction with the section on Policy B9.

## Main Issues

- Should the Policy steer coastal developments away from undeveloped parts of the coastline.
- Does the Policy afford adequate protection to the coastal plain

## Inspector's Considerations and Conclusions

*Should the Policy steer coastal developments away from undeveloped parts of the coastline*

1. Paragraph 7.4 of PPW informs that UDP policies should aim to protect or enhance the character and landscape of the undeveloped coastline. In its DD form the Policy seeks to allow only proposals that need to be located on or in close proximity to the coast or estuaries. In its revised form, as introduced by NA 62, the first criterion indicates that they "must be located on or in close proximity to the coast or open estuaries". As the Policy is solely concerned with development on or near the coast, it seems that there has been an error of drafting in this criterion; I have assumed what is meant is that proposals must *require* a location on or near the coast. Such a stance would be consistent with national policy. Moreover, as an objector suggests, the restrictive stance of the policy could go further - in line with my reasoning in relation to B9 I consider that 2 additional criteria should be introduced to improve the protection for the open coastline. Firstly that "there are no suitable locations within the developed coastline", and secondly, that "priority will be given to locations that are visually well related to existing buildings or structures". I include these suggested changes in my recommendations below.

2. I have noted the particular concerns expressed by some objectors in relation to industrial proposals but in the interests of conciseness it is not appropriate to refer to specific forms of development; the suggested form of the Policy will enable the decision maker to make a proper assessment of any development proposal according to the details of the envisaged activity.

*Does the Policy afford adequate protection to the coastal plain*

3. Several objectors refer to the comments contained in the Baker Report which suggests that the protection afforded by this policy ought to be strengthened. They seek a form of expression which more closely resembles that used in B9. The introduction of criteria by NA 62, as slightly modified by NAP 76, establishes the importance of biodiversity, ecology and landscape considerations. The repeat of the word "noise" in the list of impacts should be deleted and the introduction in the Further Proposed Change of "and" among the list of potential impacts ought to be replaced by "or" to avoid the impression that all identified impacts need to be present in a particular case. It will be necessary to subject the element of the Further Proposed Change, which I consider should be incorporated within the Plan, to public scrutiny as part of the proposed modifications – any comments received at that time would need to be carefully considered.

4. On a more general point, I agree with the Baker Report that considerations relating to the Heritage Coast and other areas of open coastline could be better dealt with by a single policy. At present the criteria contained in both policies deal with broadly the same matters but are expressed in different ways, this is likely to

lead to unnecessary confusion in the interpretation of particular clauses. This could be avoided by the amalgamation of the policies into one which could be drafted to afford a higher level of protection to the Heritage Coast. The additional criteria that I suggest in relation to B9 and the first issue above could be incorporated into the amalgamated policy. Alternatively both policies could remain as discrete entities but that greater consistency in the wording of the criteria could be achieved.

5. Objectors have raised concern on the basis that the extent of the 'open coastline' is not defined. In my opinion, whilst I acknowledge the benefit of so doing in terms of adding certainty to the Plan, it is neither necessary nor desirable to do so. A judgement will be required to be made on a case-by-case basis as to whether a particular development affects the open coastline. This will not only depend on site characteristics but the nature of the development in question.

## **RECOMMENDATIONS**

**I recommend:**

**EITHER - (REC.0115) that the DD be modified by the acceptance of NA 62 as amended by NAP 76, but only insofar as it relates to the deletion of "ecological balance" and replacement with "nature conservation interest", and as further amended by the following:**

- **the deletion of criterion 1 and to replace with "they require a location on or in close proximity to the coast or open estuaries";**
- **the addition of a further criterion "there are no suitable locations within developed areas of coastline";**
- **the addition of a further criterion that "priority will be given to locations that are visually well related to existing buildings or structures";**
- **the deletion of the reference to "and emissions" in the criterion 2 and to replace with "or emissions";**
- **the deletion of the first reference to 'noise' in criterion2;**

**OR – (REC.0116) that the DD be modified by re-writing the criteria so as to ensure that, other than is necessary to ensure that the Heritage Coast enjoys the greatest level of protection, that there is general consistency in the content and wording of the criteria set out in B9 and B13, including the amendments that I suggest.**

**OR – (REC.0117) that the DD be modified by amalgamating Policies B9 and B13 into one policy that would provide the safeguards against inessential or harmful development set out in the criteria listed in B9 as modified by the above suggestions, and which would afford the greatest protection against development to the Heritage Coast.**

**(REC.0118)that no other modification be made to the DD in response to these objections.**

## **POLICY B14 – PROTECTION OF INTERNATIONAL NATURE CONSERVATION SITES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA64; NA65; NA66; NA67

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/760/12</b>	<b>CCW</b>		<b>325</b>
<b>B/76/52</b>	<b>Mike Webb (RSPB)</b>		<b>325</b>
<b>B/76/53</b>	<b>Mike Webb (RSPB)</b>		<b>325</b>
<b>B/760/11</b>	<b>CCW</b>		<b>325</b>
<b>B/76/1</b>	<b>Mike Webb (RSPB)</b>		<b>325</b>
<b>B/76/14</b>	<b>Mike Webb (RSPB)</b>		<b>325</b>
<b>B/76/51</b>	<b>Mike Webb (RSPB)</b>		<b>325</b>

### **Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/56</b>	<b>Welsh Assembly Government</b>		<b>325</b>

### **Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/773/12</b>	<b>North Wales Wildlife Trust</b>		<b>325</b>

### **Main Issues**

- The role of Appropriate Assessments.
- The reference to 'proposed' in relation to Special Areas of Conservation.
- Whether the term 'in accordance with recognised methodologies' should be included.
- The weight to be afforded to the consultation response of the Countryside Council for Wales (CCW).
- The reference to "priority species or habitats".
- The use of planning conditions and agreements to compensate for any adverse impacts on Natura 2000 sites.

## Inspector's Considerations and Conclusions

### *The role of Appropriate Assessments*

1. The objector considers that the Policy should refer to the Appropriate Assessment process and should explain its role in the development control process. I agree with the Council that as this is a matter which deals with an administrative procedure it is best dealt with in the supporting text. The amplification which is provided by NA 65 enhances the reader's understanding of the procedure.
2. Footnote ? wrongly implies that an Appropriate Assessment may be part of an Environmental Impact Assessment. Both procedures are discrete elements and the replacement of "subsumed within" by "informed by" introduced in NA 67 better reflects the relationship between them.
3. An objector considers that more information should be included on the Appropriate Assessment mechanism, in particular detailing the 2 stages of the exercise. On this matter I concur with the Council that it is not necessary to provide such additional detail within the Plan, in the interests of conciseness. Such additional background information might usefully be set out within supplementary planning guidance on the topic of nature conservation rather than being incorporated within the Plan.

### *The reference to 'proposed' in relation to Special Areas of Conservation*

4. To reflect developments in the designation of Special Areas of Conservation the Council has introduced NA 64 which proposes the deletion of the term "proposed".

### *Whether the term 'in accordance with recognised methodologies' should be included*

5. NA 65 introduces references to "in accordance with recognised methodologies" within the supporting text. I agree that this provides readers of the Plan with a better understanding of the standard that would be expected in terms of an Appropriate Assessment, although the use of the phrase in two successive paragraphs represents unnecessary duplication.

### *The weight to be afforded to the consultation response of the Countryside Council for Wales (CCW)*

6. In relation to a response by CCW on planning applications, an objector considers that the Policy should undertake to "conform with their needs" rather than "give thorough consideration to its comments". PPW stresses the statutory role played by CCW in providing "specific advice" on nature conservation issues in development control. TAN 5, Nature Conservation and Planning, refers to the need to "take account" of advice from CCW. There is no justification to amend the Plan so that it suggests that the local planning authority is obliged to follow the advice of CCW. I consider that the change introduced by NA 66, that "appropriate weight" replaces "thorough consideration", clearly establishes the onus on the local planning authority to take into account the advice of this important consultee.

*The reference to "priority species or habitats"*

7. In response to an objection to the references made in footnote ? the Council proposes NA 67 which makes reference to 2 EC Directives – 92/43/EEC and 70/409/EEC. It correctly describes the latter as the Wild Birds Directive, but describes the former as the "EC Directive". This should be omitted and replaced with the "Habitats Directive". Subject to this change I consider that the Pre-inquiry Proposed Change provides clarification on this matter.

*The use of planning conditions and agreements to compensate for any adverse impacts on Natura 2000 sites*

8. In response to an objection the Council proposes, through NA 64, to delete the reference to the use of planning conditions or agreements in relation to sites of international status. This change addresses the inaccuracy of the Deposit Draft and its deletion is appropriate.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0119) that the DD be modified by the acceptance of NA 64;**

**(REC.0120) that the DD be modified by the acceptance of NA 65 as further modified by the deletion of one of the references to "in accordance with recognised methodologies";**

**(REC.0121) that the DD be modified by the acceptance of NA 66;**

**(REC.0122) that the DD be modified by the acceptance of NA 67 as further modified by the replacement of "EC Directive" with "Habitats Directive";**

**(REC.0123) that no other modification be made to the DD in response to these objections.**

## POLICY B15 – PROTECTING NATIONAL SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA68; NA69

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/76/3	Mike Webb (RSPB)		290
B/76/4	Mike Webb (RSPB)		290
B/76/8	Mike Webb (RSPB)		290
B/76/9	Mike Webb (RSPB)		290
B/786/1	Jill Jackson		290

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref.
B/76/5	Mike Webb (RSPB)		
B/773/13	North Wales Wildlife Trust		

### Main Issues

- Whether criterion 2c is complete.
- The reference to “seek to” in the supporting text.
- Whether “national network of important sites” should be added to the supporting text in relation to Sites of Special Scientific Interest.

### Inspector’s Considerations and Conclusions

#### *Whether criterion 2c is complete*

1. The objector suggests, without elaboration, that criterion 2c is incomplete. The Council disagrees. It seems to me that the criterion identifies 2 requirements which, in the context of the phrase that precedes the 4 criteria, makes grammatical sense. No change is required.

#### *Whether the reference to “seek to” in the supporting text should be deleted*

2. In response to an objection the Council proposes, by NA 68, to omit the reference to “seek to” from the supporting text. This change achieves consistency between the Policy and its explanatory text and should be incorporated in the Plan.

#### *Whether “national network of important sites” should be added to the supporting text in relation to Sites of Special Scientific Interest*

3. NA 69 proposes to change the reference to SSSIs from a “collection of sites” to a “national network of important sites”. This meets the objection and adds clarity to the Plan.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0124) that the DD be modified by the acceptance of NA 68;**

**(REC.0125) that the DD be modified by the acceptance of NA 69;**

**(REC.0126) that no other modification be made to the DD in response to these objections.**

**POLICY B16 – PROTECTING SITES OF REGIONAL OR LOCAL SIGNIFICANCE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA70; NA71; NA72; NA73; NA74; NA75; NA392

This Section is subject to Further Proposed Changes Nos: NAP88

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/786/3	Jill Jackson		322
B/760/13	CCW		322
B/76/16	Mike Webb (RSPB)		322
B/76/13	Mike Webb (RSPB)		322
B/76/7	Mike Webb (RSPB)		322
B/76/15	Mike Webb (RSPB)		322
B/76/10	Mike Webb (RSPB)		322
B/731/13	Iwan Rhys Edgar		322
B/76/12	Mike Webb (RSPB)		322

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/14	North Wales Wildlife Trust		322

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/76/6	Mike Webb (RSPB)		
B/76/11	Mike Webb (RSPB)		

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/756/2088	Environment Watch Wales & the Borders		
B/773/2044	Chris Wynne (North Wales Wildlife Trust)		

## Main Issues

- Whether Local Nature Reserves should be the subject of a separate policy.
- The term 'ecological survey'.
- The description of the nature conservation interest of Local Nature Reserves.
- Organisations dealing with Non-statutory Nature Reserves (NsNR).
- Is the supporting text misleading in relation to mitigating measures.
- Whether the reference to "promote and create" should be deleted.
- Whether "location" should be inserted after "appropriate".
- Is there a need to define and map Wildlife Sites.
- Whether the Policy should be cross-referenced to policies on new roads.
- Whether prospective developers should to suggest mitigating measures.
- Should the Policy be more proactive in relation to agricultural land.
- Protecting wildlife corridors.
- Whether criterion ch should be amended or deleted.
- Whether the supporting text should refer to the enhancement as well as the protection of important features.
- Whether the role of non-statutory sites and the process of assessment should be better explained.
- The identification of NsNR sites on the Proposals Map.
- Wildlife corridors and stepping stones.

## Inspector's Considerations and Conclusions

### *Whether Local Nature Reserves (LNRs) should be the subject of a separate policy*

1. The Policy deals with sites of regional or local significance which, by definition, includes LNRs. In the case of LNRs which are also designated as SSSIs, Policy B15 would apply. Thus, contrary to the views of an objector, I see no reason to introduce a separate policy to deal specifically with LNRs, which would add unnecessarily to length of the Plan.

### *The description of the nature conservation interest of Local Nature Reserves*

2. Footnote ? of the DD states that the quality of LNRs are equal to SSSIs. The Council accepts that this is incorrect and NA 75 proposes to delete this sentence.

### *Organisations dealing with Non-statutory Nature Reserves (NsNR)*

3. NA 75, as further amended by NAP 88, proposes to reword Footnote ? so that it explains that NSNRs are managed by organisations such as the North Wales Wildlife Trust and the RSPB. This better reflects the way these areas are managed and is a change that should be incorporated. Any responses received to NAP 88 as part of the public consultation on the proposed modifications would need to be carefully considered given that this change has yet to be subjected to such scrutiny.

### *Is the supporting text misleading in relation to mitigating measures*

4. The objector suggests that the fourth bullet point of supporting paragraph 3.4.7 should be changed to "ensure that" there are mitigating measures that can be undertaken rather than to "determine whether" such measures can be taken. As the bullet points are factors to be taken into account by the Local Planning

Authority it would not be appropriate for them to be expressed as requirements, such as is suggested by the objector. However, the present construction of this supporting paragraph leads to confusion. It identifies 6 factors that the planning authority will take into account. They are listed as bullet points, each one is dependent on the preceding phrase – “The planning authority will take into account the following factors:”. The bullet point in question begins with “determine whether”. This does not make grammatical sense when linked to the preceding phrase. I suggest that the reference to “determine” should be omitted, so that the factor to be assessed would be “whether there are any mitigating measures .....”. This would be consistent with the aim of the Policy. The reference to “determine” at the start of 2 other bullet points should be deleted for the same reason.

*Whether the reference to “promote and create” should be deleted*

5. The objector suggests that a reference in the Policy to “promote and create” should be deleted and replaced with “safeguard/secure”. The Policy does not contain the phrase in question, however there is reference to the protection and enhancement of remaining nature conservation features. I consider that this positive approach is justified and is a broader stance than the safeguarding position suggested by the objector. No change is necessary in this respect.

*Whether “location” should be inserted after “appropriate”*

6. NA 71 corrects what appears to be a typographical error which led to the omission of “location” which ought to have appeared after “or in another appropriate” at the end of the Policy.

*Is there a need to define and map Wildlife Sites*

7. The Council accepts an objector’s comment that Wildlife Sites need to be the subject of a clear definition and should be mapped. Another objector suggests that the criteria should be based on habitat size and that appropriate amendments should be made to the supporting paragraph 3.4.6. However, contrary to the position set out in that supporting paragraph, the Council in its Proof of Evidence confirms that it has yet to adopt a set of criteria for assessing the suitability of sites for designating Wildlife Sites. In the absence such information and the failure of the Plan to identify the location of such sites, it is premature for the designation of Wildlife Sites to be included within the Plan. The opportunity will arise as part of the review of the Plan or preparation of a replacement Plan to pursue this matter, but the reference to Wildlife Sites should be deleted from the Policy.

*Whether the Policy should be cross-referenced to policies on new roads*

8. The relevance of this Policy to new road proposals is clear and the same is true of other policies dealing with habitat and species protection. However, it is not appropriate to provide a cross-reference within these to policies dealing with specific types of development. Whether these policies should be identified as key policy considerations with regard to policies on new roads is dealt with in relation to the section of the report dealing with such policies.

*Ecological survey and mitigating measures*

9. In response to an objection the Council has proposed NA 73 which inserts the word "field" between "ecological" and "survey" in supporting paragraph 3.4.7. However, in line with that suggested by an objector it seems reasonable that this requirement is expanded so that it is undertaken by a suitably qualified person and that it includes an assessment of any mitigating and/or compensatory measures. Thus, the term ecological assessment would be more suitable than that suggested by the Council as it would reflect the wider scope of the work that may be required in certain cases.

*Should the Policy be more proactive in relation to agricultural land*

10. The Policy deals specifically with sites that have been designated on the basis of their local or regional biodiversity value. A general approach to encouraging the promotion of nature conservation on agricultural land would not fall within its ambit. Moreover, whilst there are other policies that are of significance in this respect, the role that a development plan can play in influencing the way agricultural land is managed is limited, other than where it is the subject of certain development proposals. I conclude that no change to the Plan is necessary in this respect.

*Protecting wildlife corridors*

11. NA 100 introduces a new policy which deals specifically with wildlife corridors, habitat linkages and stepping stones. Thus, it is not necessary for B16 to expand on this issue.

*Whether Criterion ch should be amended or deleted*

12. Criterion ch of the DD requires opportunities to be provided for the public to enjoy and interpret the site. In response to an objection that points out that such a requirement will not always be desirable, NA 70 introduces the qualifying phrase "where appropriate". To avoid any ambiguity I suggest that the phrase should be inserted at the start of the criterion rather than at the end.

*Whether the supporting text should refer to the enhancement as well as the protection of important features*

13. In order to properly reflect criterion c of the Policy, NA 74 adds *enhancement* to the *protection* of important features referred to in paragraph 3.4.7.

*Whether the role of non-statutory sites and the process of assessment should be better explained*

14. The objector considers that a further explanation of the role of non-statutory sites such as NsNR and Wildlife Sites should be provided together with the process for their assessment. In relation to latter it is not possible for the Plan to provide more detail given that work on these designations has yet to be completed. As I consider that such a designation should be omitted from the Plan additional information is not needed. Turning now to NsNR – although they are identified by NA 392 on the proposals maps no information is provided in the Plan or supporting policy, other than Footnote ?, on this designation. As a consequence it is not

possible for me to ascertain whether these designations are soundly based on a formal scientific assessment as required by PPW. Unless they are based on a robust assessment all references to NsNRs should be omitted from B16 and thus the need for explanatory detail does not arise.

*The identification of NsNR sites on the Proposals Map*

15. NA 392 identifies the NsNR sites on the proposals map. As I explain in the preceding paragraph the inclusion of such sites on the proposals maps should only be undertaken if the designation can be justified.

*Wildlife corridors and stepping stones*

16. PPW recognises the important role that non-statutory sites can play together with statutory sites in forming networks linking habitats and contributing to the conservation and enhancement of biodiversity and the quality of the local environment. In response to an objection the Council proposes NA 72 which refers to "wildlife corridors". This is an appropriate addition to the Plan but, in line with that suggested by the objector, I consider that there should also be a reference to the concept of 'stepping stones' which is a widely used term in this context. The term establishes the value of such connections even where an uninterrupted linear link cannot be achieved. Indeed a new policy proposed by NA 100 acknowledges the value of such linkages.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0127) that the DD be modified by the acceptance of NA 70 as further amended by moving the phrase "where appropriate" from the end of criterion ch. to its beginning;**

**(REC.0128) that the DD be modified by the acceptance of NA 71;**

**(REC.0129) that the DD be modified by the acceptance of NA 72 as further amended by inserting "or stepping stones" immediately after "as wildlife corridors";**

**(REC.0130) that the DD be modified by the acceptance of NA 73;**

**(REC.0131) that the DD be modified by the acceptance of NA 74;**

**(REC.0132) that the DD be modified by the acceptance of NA 75 as further amended by NAP 88;**

**(REC.0133) that the DD be modified by the acceptance of NA 392;**

**(REC.0134) that the DD be modified by the deletion of all references to Wildlife Sites;**

**(REC.0135) that the DD be modified by the deletion of all references to Non-statutory Nature Reserves (NsNR), unless it can be demonstrated that the designation is based on a formal scientific assessment;**

**(REC.0136) that the DD be modified by the deletion of "ecological survey" in the first sentence of paragraph 3.4.7 and replacement with "ecological assessment". Immediately after that sentence that an additional sentence is inserted along the lines that "The assessment shall be undertaken by a suitable qualified person and shall include an ecological survey and an assessment of any mitigation and/or compensatory measures.";**

**(REC.0137) that the DD be modified by the deletion of "determine" from the beginning of 3 of the bullet points in paragraph 3.4.7;**

**(REC.0138) that no other modification be made to the DD in response to these objections and, in particular, that NA 73 be not accepted.**

**POLICY B17 – PROTECTING REGIONALLY IMPORTANT GEOLOGICAL/GEOMORPHOLOGICAL SITES (RIGS)**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/844/31</b>	<b>CPRW</b>		<b>295</b>

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/773/15</b>	<b>North Wales Wildlife Trust</b>		

**Note**

- As objection B/844/31 has been unconditionally withdrawn since the preparation of the above table, there are no objections that require my attention in relation to this Policy



## POLICY B18 – PROTECTED TREES AND HEDGEROWS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA76; NA77

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/953/4	RMC Northen	Jo Davies	289
B/575/1	Aberdaron Community Council		289
B/760/14	CCW		289
B/786/4	Jill Jackson		289
B/760/15	CCW		289
B/76/18	Mike Webb (RSPB)		289

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/57	Welsh Assembly Government		289
B/734/58	Welsh Assembly Government		289

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/13	House Builders Federation		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/773/16	Chris Wynne (North Wales Wildlife Trust)		

### Main Issues

- Whether ancient and semi-natural woodlands should be the subject of a separate policy.
- Hedgerow protection.
- Is the Policy too restrictive.
- Whether the Policy should include criteria against which to assess proposals.
- Mapping of ancient and semi-natural woodland.

- Matters of terminology and expression.

## **Inspector's Considerations and Conclusions**

*Whether ancient and semi-natural woodlands should be the subject of a separate policy*

1. There is a clear regime that offers protection to trees the subject of a tree preservation order (TPO) and for those within a conservation area. Similarly the Hedgerow Regulations provide statutory, planning-related protection for hedgerows. There is no such statutory protection that is conferred by a site's designation as ancient and semi-natural woodland. Nevertheless PPW recognises the value of ancient and semi-natural woodlands as irreplaceable habitats of high biodiversity value which should be protected from development that would cause significant damage.

2. An objector points out that TPOs and trees in a conservation area are protected for the contribution to visual amenity whereas ancient woodlands are valued for their historical links and the richness of their wildlife habitat. However, hedgerows are protected for a variety of reasons including landscape, archaeological/historical and nature conservation value. With this in mind, and given the desirability of keeping the number of policies to the necessary minimum, I find the Plan's approach of grouping these matters under one policy is acceptable. It will be necessary to apply the Policy's requirements according to the circumstances of each case and the type of feature to be protected.

3. In the interests of accuracy and clarity I consider that the reference to a tree, woodland or hedgerow that is "protected" should be broadened to "that is protected or lies within a designated ancient and semi-natural woodland". NA 76 introduces the term woodland into the Policy's title which aligns with this approach.

*Hedgerow protection*

4. The Hedgerow Regulations offer protection to hedgerows in particular circumstances, and there is no reason to suggest that including hedgerows within the remit of this policy is inappropriate, even though the prominence of hedgerows as landscape features within this part of Wales, especially the more mountainous parts, is not as great as in some other areas. The CCW suggests that further consideration should be given to traditional local techniques of boundary enclosure, but no suggested changes to the Plan have been presented. In the circumstances it is not appropriate that I suggest that the plan be amended but this may be a matter that the Council will wish to consider in the future in terms of preparing supplementary planning guidance or in the review/replacement of the Plan.

*Is the Policy too restrictive*

5. In response to a concern raised by objectors, the Council accepts that the Deposit Draft version of the Plan is worded too negatively in that it seeks to refuse all forms of proposals that would lead to the loss of, or damage to, protected trees, woodland or hedgerows. I agree that as originally drafted the Policy was unreasonable in that it did not envisage any circumstance where development that damaged these natural features could be acceptable; in this respect the Policy contradicted the more positive stance set out in the supporting text. NA 76

introduces the term “unless”, but the suggested phrase does not make grammatical sense – “Proposals .... will be refused unless the development outweighs their [the trees etc] contribution to public amenity .....”. I have assumed that this is a typographical error which has inadvertently omitted a phrase such as ‘benefit derived from’ which ought to have appeared immediately before “the development”. Nevertheless I consider that the general approach suggested by an objector, which allows harmful development in exceptional circumstances, indicates a more positive approach to development without compromising the level of protection that the Council seeks to provide. Guidance should be provided on what would constitute such circumstances, such as – “where the harm is clearly outweighed by economic and/or social benefit”. One objector suggests applying the test of “a great need for the development” but I consider this to be too vague.

*Whether the Policy should include criteria against which to assess proposals*

6. An objector points out that supporting paragraph 3.4.12 sets out useful criteria which would be better included within the Policy rather than its supporting text. In its Proof of Evidence the Council states that it accepts this comment and suggests that NA 76 overcomes this objection. It does not. In my view the criteria for assessing proposals affecting hedgerows, as set out in that paragraph should be incorporated in the Policy rather than its supporting text. Likewise, paragraph 3.4.10 contains useful criteria for assessing schemes affecting trees and should be incorporated within the Policy more fully than is proposed by NA 76. Some of the deletions proposed by NA 77 address significant considerations that are worthy of retention, albeit that they may be more appropriate within the Policy. A list of criteria should be identified as part of the Policy that would enable the ‘value’ of the features under consideration to be assessed. A distinction should be drawn between tree and hedgerow considerations, and preceded by a phrase along the lines of “Proposals will be assessed against the following criteria:”. The criteria could also include the potential for replacement planting or other compensatory measures (along the lines proposed by NA 76) and any economic or social benefit.

*Mapping of ancient and semi-natural woodland*

7. The Countryside Council for Wales queries whether the maps denoting ancient and semi-natural woodland should be reviewed. The Council explains that the proposals map designations have been based on the latest available data held by CCW. On this basis no change is required to the Plan although any changes to the boundaries that may arise from future appraisals of the maps can be incorporated at Plan review stage or when a new plan is prepared.

*Matters of terminology and expression*

8. An objector questions whether the term “conservation areas” should have capital letters and suggests that “Ancient and Semi-Natural Woodland” should be replaced with “Ancient or Semi-Natural Woodland”. The Council proposes NA 77 to address these matters. I agree with an objector insofar as it is desirable to achieve consistency in the use of capital letters when referring to various designations. However, I consider that as the references to these designations are general, rather than forming the name of a particular site they ought to be in lower case. The Plan should be amended accordingly. Turning now to the title of the woodland, supporting paragraph 3.4.10 uses both terms and, despite a suggestion

to the contrary in the Council's Proof of Evidence, no change is proposed in this respect. The term 'ancient and semi-natural woodland' is consistent with the terminology used in PPW and in the interests of consistency ought to be the only term used in the Plan.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0139) that the DD be modified by the insertion of "WOODLANDS" immediately after "TREES," in the Policy title;**

**(REC.0140) that the DD be modified by the insertion of "or lies within a designated ancient and semi-natural woodland" immediately after "protected" in the second line of the Policy;**

**(REC.0141) that the DD be modified by the deletion of the phrase in the first sentence of the Policy – "due to their ... nature conservation terms will be refused", and replacement with "will be permitted only where any harm is clearly outweighed by the economic and/or social benefits of the development. Proposals will be assessed against the following criteria:";**

**(REC.0142) that the DD be modified by the acceptance of NA 77 and as further amended by the deletion of the sentence "The Planning ..... life span"; and the reference to "Ancient or Semi-Natural Woodland" in the final sentence should be changed to "ancient and semi-natural woodland".**

**(REC.0143) that the DD be modified by the inclusion of a list of criteria against which to assess the 'value' of the trees, woodland or hedgerow affected, and to add criteria to assess the contribution of any mitigation or compensatory measures, and the socio-economic benefits of the scheme;**

**(REC.0144) that the DD be modified by amending the text in the supporting paragraphs to avoid duplication with the matters addressed as criteria in accordance with the preceding recommendation;**

**(REC.0145) that the DD be modified by the use of lower case letters in relation to all general references to tree preservation orders, ancient and semi-natural woodland as well as conservation areas;**

**(REC.0146) that no other modification be made to the DD in response to these objections and, in particular, that NA 76 be not accepted.**

### 3.4.13 PROTECTED SPECIES AND SPECIES THAT ARE LOCALLY DISTINCTIVE INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA78

#### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/786/5	Jill Jackson		355
B/760/16	CCW		355
B/76/19	Mike Webb (RSPB)		355
B/760/17	CCW		355

#### Main Issues

- Potential roosting sites.
- Requirements relating to an ecological survey.
- Is the role of the CCW properly described.

#### Inspector's Considerations and Conclusions

##### *Potential roosting sites*

1. As an objector rightly points out, bats can use any age of building as a roosting site. Thus, the reference to "old" buildings is misleading. This has been corrected by the Council through NA 78.

##### *Requirements relating to an ecological survey*

2. NA 78 also introduces changes to the text relating to the requirement for a developer to submit an ecological survey. The revised form of wording provides a more accurate account of the need for, and extent of, such a survey. In my view it adequately addresses the previous inadequacies highlighted by objectors. Whilst an objector wishes to see a specific policy on situations where surveys would be required, I do not see this as being essential although the Council may decide that further guidance in the form of supplementary planning guidance may prove helpful. This could include guidance on the types of mitigating measures that could be addressed as part of an ecological assessment.

##### *Is the role of the CCW properly described*

3. The Council agrees with an objector that the role of the CCW is more than merely providing advice. It explains that NA 78 includes an amendment to address this. The change suggested is the addition at the end of clause 1. – "and give appropriate consideration to its proposals". The meaning of this phrase is not clear to me, nor am I clear as to the nature of the CCW role to which the objector refers - the Council is not bound to accept a consultation response from CCW. I elaborate on this point in the section dealing with Policy B14. The purpose of the clause is to

form part of a list of information upon which the Council will base its decision on a planning application. It seems to me that the DD version is appropriate save for one minor change – instead of referring to “Contact the” at the start of point 1 it should undertake to “Consult with”.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0147) that the DD be modified by the acceptance of NA 78, except insofar as it relates to the proposed addition to point 1. - “and give appropriate consideration to its proposals”, which should be omitted.**

**(REC.0148) that the DD be modified by the deletion of “Contact the” from the beginning of point 1 and replacement with “Consult with”;**

**(REC.0149) that no other modification be made to the DD in response to these objections.**

**POLICY B19 – SPECIES AND THEIR HABITATS THAT ARE INTERNATIONALLY, NATIONALLY AND LOCALLY IMPORTANT**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA79; NA80; NA81

This Section is subject to Further Proposed Changes Nos: NAP112

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/76/20	Mike Webb (RSPB)		316
B/760/21	CCW		316
B/760/18	CCW		316
B/786/7	Jill Jackson		316
B/786/6	Jill Jackson		316
B/760/20	CCW		316
B/76/21	Mike Webb (RSPB)		316

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/59	Welsh Assembly Government		316

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/17	Chris Wynne (North Wales Wildlife Trust)		

**Supporters of Deposit Draft**

Ref No	Name	Agent	Response Ref
B/76/22	Mike Webb (RSPB)		

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/844/2064	CPRW		316

## Main Issues

- Whether the wording of clause 1b. of the Policy should reflect the statutory wording.
- Locally rare or vulnerable species.
- The need to refer to legislation.
- Whether the 'List' referred to in the third bullet point should be amended.
- A more cautious approach to the relocation of species.
- Is the expression "move towards biodiversity gain" an appropriate aim.
- Whether the wording of the first and third criteria under point 1 should be altered.
- Is the term "species' vitality" appropriate.

## Inspector's Considerations and Conclusions

*Whether the wording of clause 1b. of the Policy should reflect the statutory wording*

1. NA 79 re-words criterion 1b. so that it reflects that which appears in regulation 44(3) of The Conservation (Natural Habitats, &c.) Regulations 1994. Subject to the insertion of the word "a" which appears in the regulation but has been omitted from the Pre-inquiry Proposed Change as detailed in my recommendation below, I consider that it would provide consistency between local policy and statutory regulation and should be incorporated into the Plan.

*Locally rare or vulnerable species*

2. In response to an objection the Council accepts that it is not appropriate to seek to include locally rare or vulnerable species under this policy. I agree and consider that the revised reference in the second part of the Policy to species "protected under national legislation" introduced by NA 79 is more suitable.

*The need to refer to legislation*

3. The Pre-inquiry Proposed Change version of the Policy refers to protection under national legislation at the outset of point 2. I agree with the Council that in the interests of conciseness it is not appropriate to detail the legislative framework that governs the protection of certain species and their habitats. The supporting text mentions some national legislation as examples. In the interest of consistency it is appropriate that the reference to the Protection of Badgers Act should include its full title. This is addressed by NA 80 which inserts "1992" after the word "Act".

*Whether the 'List' referred to in the third bullet point should be amended*

4. Objection is made to the title used in relation to a statutory list mentioned in the third bullet point of the supporting text to the Policy. However, as NA 80 proposes to delete the last 3 bullet points, including the one in question, and I agree with this change I do not intend to comment further on that point. It should be noted that further changes to paragraph 3.4.14 are required given that the one remaining bullet point could be incorporated into the preceding sentence and the last word of the paragraph, "or", should be deleted.



*A more cautious approach to the relocation of species*

5. In relation to species addressed in point 2, the Policy seeks to refuse planning permission for development that would cause harm unless either the effects can be minimised or mitigated (option a.), or that the species or habitat is relocated (option b.). An objector suggests that, because of problems in successfully relocating species, option b. should be identified in the policy as a 'last resort'. The Council accepts the problems associated with relocation and suggest that NA 79 overcomes the objection. However, it replaces the term "if appropriate", which qualifies clause b., with "in exceptional circumstances when this [measures to minimise or mitigate] is not practical,". This phraseology would have the undesirable effect of suggesting that relocating is an acceptable option in all cases where mitigation or minimisation of harm is not practical, regardless of its likely effectiveness. Instead I suggest "[or] when this is not practical and the following is likely to prove effective". Such an alteration means that the attempt to correct the Welsh version of 2.a. as set out in NA 79 which is proposed in NAP 112 is not required.

*Is the expression "move towards biodiversity gain" an appropriate aim*

6. The final sentence of the supporting text explains that the aim is "to move towards biodiversity gain rather than loss". NA 81 replaces the vague notion of "move towards" with a more suitable term - "ensure".

*Whether the wording of the first and third criteria under point 1 should be altered*

7. An objector queries the wording of criteria 1a., b., and c. but other than highlighting certain words does not elaborate on the concerns. In relation to the second criterion it seems that the concern is addressed by NA 79. I do not consider that there is a need to alter the reference to "options" in the first criterion. No explanation is provided for the third criterion but on the basis of its content I have assumed that this criterion is based on regulation 44(2)(e) of the aforementioned Regulations. However, the Policy deviates in terms of the wording used in the Regulations. Most notably it seems to have paraphrased the Regulations reference to "overriding public interest" as "that override the public's interests". For the same reasons as the rewording of criterion 1.b. is necessary, so should 1.c. be altered to properly reflect the legislation, which is set out in my recommendations below.

*Is the term "species' vitality" appropriate*

8. The word vitality which appears at the very end of the Policy is queried by an objector, but no elaboration has been provided. There seems to be no reason to suggest that the term is unacceptable in the context in which it appears.

## **RECOMMENDATIONS**

### **I recommend:**

**(REC.0150) that the DD be modified by the acceptance of NA 79 as further amended by the following:**

- the insertion of the word "a" before "favourable conservation status" in criterion 1.b.;
- that at the end of clause 2.a. "in exceptional circumstances when this is not practical," is deleted and replaced with "when this is not practical and the following is likely to prove effective";
- that clause 1.c. is deleted and replaced with "and the development will preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment";

**(REC.0151) that the DD be modified by the acceptance of NA 80 as further amended by removing the bullet point format and deleting the reference to "or" at the end of paragraph 3.4.14;**

**(REC.0152) that the DD be modified by the acceptance of NA 81;**

**(REC.0153) that no other modification be made to the DD in response to these objections and, in particular, that NAP 112 be not accepted.**

**POLICY B20 – GWYNEDD LOCAL BIODIVERSITY ACTION PLAN  
HABITATS – “NATUR GWYNEDD”**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA82; NA83

This Section is subject to Further Proposed Changes Nos: NAP111

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/76/26	Mike Webb (RSPB)		319
B/76/24	Mike Webb (RSPB)		319
B/76/23	Mike Webb (RSPB)		319

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/60	Welsh Assembly Government		319

**Supporters of Draft Deposit**

Ref No	Name of Supporter	Agent	Response Ref
B/773/18	Chris Wynne (North Wales Wildlife Trust)		319
B/76/25	Mike Webb (RSPB)		319

**Main Issues**

- The requirements of The Conservation (Natural Habitats, &c.) Regulations 1994.
- Habitat and Species Action Plans produced after the Plan was prepared.
- Reference to the Environmental Impact Assessment Regulations.

**Inspector's Considerations and Conclusions**

*The requirements of The Conservation (Natural Habitats, &c.) Regulations 1994*

1. The objector considers that the Policy should align with the requirements of Regulation 37 of The Conservation (Natural Habitats, &c.) Regulations 1994 and suggests that the model policy suggested in the Good Practice Guide, 'Planning for Biodiversity', produced by the Royal Town Planning Institute (RTPI) in 1999 should be used. In response the Council proposes NA 100 which introduces a new policy based on the suggested model. No explanation is provided for the introduction of this text as an additional policy. It seems to me that the proposed new policy and B20 share the same objectives and that their requirements are essentially the

same, save in one respect. Unlike B20, the new policy recognises that the reasons for a development can outweigh the need to retain important features. Such an acknowledgement is consistent with the position set out in PPW which requires UDP policies to clarify how biodiversity of sites not statutorily protected will be safeguarded without unduly restricting development.

2. The introduction of an additional policy adds unnecessarily to the length of the Plan, introduces the potential for confusion that would arise in assessing proposals against 2 policies with essentially the same aim but which contain differences of detail. Thus I conclude that B20 and its 2 supporting paragraphs should be largely deleted and replaced with the wording of the proposed new policy NA 100, save for the references to the 3 sources of information on important species and habitats that appear in NA 82, which I detail in the second issue below. This could be used as the basis for determining important "landscape features" to which the new policy refers, rather than providing a list as is suggested in the RTPI's model policy. If necessary a supplementary list of important features which are not included within these sources could be provided, thus ensuring that the various forms of locally important wildlife corridors and stepping stones are recognised. The amalgamation of this Policy and new policy NA 100 would effectively create a new B20.

*Habitat and Species Action Plans produced after the Plan was prepared*

3. The objector seeks to ensure that the latest available information contained in Action Plans, which continue to be produced on the basis of a rolling programme, is taken into account in the application of this Policy. In response the Council has proposed, under NA 82, to delete the reference to "relevant" Habitat Action Plans and Species Action Plans that are included in Gwynedd's Local Biodiversity Action Plan, 'Natur Gwynedd'. Instead it proposes to refer to species and habitats identified in the UK Biodiversity Action Plan, in Section 74 of the CROW Act 2000 as well as in 'Natur Gwynedd'. This provides a clear standard although its presentation could be simplified. At the end of the explanatory paragraph a 'new' B20 could be appended "When determining a planning application the Local Planning Authority will consider the following:". This could be followed by 3 bullet points identifying the sources of information, which could be based on points a. and b. of NA 82 together with the relocation of the information in Footnote ? on Natur Gwynedd, as a third bullet point.

*Reference to the Environmental Impact Assessment Regulations*

4. Paragraph 3.4.18 of the Deposit Draft deals with the need for an Environmental Impact Assessment (EIA). The Council accepts that this introduces a level of detail to the Plan which is unnecessary and I agree. In any event, for reasons already given I recommend the deletion of the whole of the supporting text to this Policy.

**RECOMMENDATION**

**I recommend:**

**(REC.0154) that the DD be modified by the deletion of Policy B20 and its supporting text in its entirety and their replacement with the text of NA 100 and the insertion at the end of its supporting paragraph of the**

**changes detailed at the end of my comments on the second main issue above;**

**(REC.0155) that no other modification be made to the DD in response to these objections and, in particular, that NA 82 and 83, and NAP 111 be not accepted.**

## POLICY B21 – BUILDING DESIGN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA84; NA85

This Section is subject to Further Proposed Changes Nos: NAP6

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/20	Sustainable Gwynedd Gynladwy		7

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/62	Welsh Assembly Government		7
B/734/61	Welsh Assembly Government		7
B/734/63	Welsh Assembly Government		7

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2214	Welsh Assembly Government		7

### Note

- In addition to the representations listed above I have also taken into account objections B/734/76 and B/780/11. Although the latter objection was made in relation to Strategic Policy 4, for reasons I set out in the section of the report dealing with that policy, I consider that it is also relevant to this Policy.

### Main Issues

- Defining good design including modern innovative approaches.
- Minimum qualifications/competence for individuals appraising design statements.
- Is the phrase “proposals with design implications” necessary.
- Whether the scope of the Policy should be broadened to include considerations relating to context.

- Is the reference to a specific number of dwellings appropriate.
- Is there a need to improve the clarity of the supporting text.
- Should design statements be required to address sustainable design.
- Whether NA 84 should refer to “of its” rather than “of their” in point (i).

## **Inspector’s Considerations and Conclusions**

### *Defining good design, which should include modern innovative approaches*

1. In its revised form I consider that the Policy and supporting text provides a reasonable indication of what is expected in terms of good design. Whilst the Policy identifies the need for development to respect its surroundings, it also identifies other considerations such as aspect and microclimate that are important considerations in providing more sustainable buildings - this indicates that the Policy does not seek to stifle good innovative design. Inevitably the content of any supplementary planning guidance on design will affect the way the Policy is implemented. I deal with this in the penultimate main issue below.

### *Minimum qualifications/competence for individuals appraising design statements*

2. The objector is anxious to ensure that the Council’s appraisal of design statements is undertaken by a person who has the necessary competence, including in assessing environmental performance. It is to be expected that the Council will act properly in the exercise of its development control functions. However, the competence of individuals charged with making decisions on the Council’s behalf is not a matter for the Plan.

### *Is the phrase “proposals with design implications” necessary*

3. The Council agrees that this phrase gives rise to uncertainty regarding the circumstances when this Policy would apply. Its deletion, as proposed by NA 84 and NA 85, overcomes this difficulty.

### *Whether the scope of the Policy should be broadened to include considerations relating to context*

4. The DD limits design considerations to those dealing solely with the attributes of the proposed development. NA 84 broadens the considerations to include the relationship of development to its surroundings. I agree that the Pre-inquiry Proposed Change better reflects the holistic approach to good design set out in TAN12.

### *Is the reference to a specific number of dwellings appropriate*

5. Paragraph 3.5.4 as amended by NA 85 identifies examples where a design statement will be required. The list includes developments of 5 or more dwellings. The Council has not sought to justify the inclusion of this threshold, and I agree with an objector that it seems an arbitrary figure. Furthermore, this list differs from that which is set out in the Policy which identifies “types” of development for which planning applications would be required to be accompanied by a design statement. It seems to me that the list set out in the Policy is sufficient and that the detailed examples set out in the explanatory text serve only to add confusion for the Plan reader.

*Is there a need to improve the clarity of the supporting text*

6. The Council explains that in response to several points raised by an objector in relation to the supporting text to B21, it introduced changes in NA 85. Whilst I agree with the objector that there was a need to improve the Deposit Draft version there continue to be deficiencies with the amended version. For instance the opening sentence of amended paragraph 3.5.4 refers to the need for all applicants to “present detailed illustrative materials” but no clarification of that which is to be illustrated is given. It is apparent that the production of a formal design statement is only one way in which supporting design information can be provided. The text provides additional information on such statements but no further guidance is provided on the type of detail required in cases when a full statement is not justified. It seems that the following sentence, proposed by NA 85, is intended to provide assistance in this respect – “The way in which this is done should be consistent with the nature and scale of the development.” In my view this does not provide sufficient clarity for prospective developers wishing to understand what is expected of them in terms of supporting information on the design of their projects. This deficiency should be addressed. On a separate matter, an omission of text from the second bullet point of the DD supporting text, which was highlighted by an objector, has been addressed by NA 85.

*Should design statements be required to address sustainable design*

7. TAN12 informs that local planning authorities can be influential in encouraging resource efficient site layout and building design. Building in a sustainable manner is the subject of a separate policy, C5. However, I agree with an objector that sustainable design should be addressed within design statements - the Policy or supporting text should be amended to reflect this.

8. An objector suggests that the Gwynedd Design Guide 2002 is insufficient to meet the task of assessing innovative design and the environmental performance of proposed development. The importance of supplementary planning guidance is emphasised by government and it seems to me that it is the appropriate mechanism to provide more detailed guidance on this matter. However as the Guide is not part of the UDP it is a consideration that lies outside the scope of my report. The Council explains that it will review and amend the Design Guide “as appropriate”.

*Should NA 84 refer to “of its” rather than “of their” in point (i)*

9. NAP 6 corrects the grammatical error in the first line of point (i) of the Pre-inquiry Proposed Change version by using the singular “its” in relation to “proposal” rather than “their”. Given the minor nature of this amendment I am content to recommend upon it even though it has yet to be subject to public scrutiny. Nevertheless any comments received during the proposed modifications on this change should be carefully considered by the Council.



## **RECOMMENDATIONS**

**I recommend:**

**(REC.0156) that the DD be modified by the acceptance of NA 84 as further amended by NAP 6;**

**(REC.0157) that the DD be modified by the acceptance of NA 85 as further amended by the following:**

- **the re-writing of the opening sentences of NA 85 to provide clearer guidance on the type of information required to accompany a planning application in which a formal design statement has been deemed to be unnecessary (see paragraph 6 above);**
- **the deletion of the bullet point list of examples of cases where a design statement would be required from paragraph 3.5.4 and its introductory sentence;**
- **the inclusion of a reference within paragraph 3.5.4 to the need to address sustainable design as part of any design statement, formal or otherwise, submitted in support of a planning application;**

**(REC.0158) that no other modification be made to the DD in response to these objections.**

## POLICY B22 - AMENITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA86

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/14	House Builders Federation		306

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/64	Welsh Assembly Government		

### Main Issue

- Access by disabled persons

### Inspector's Considerations and Conclusions

1. The fifth criterion of the Deposit Draft version deals with facilitating access to a building by disabled individuals. In response to an objection the Council proposes to delete this requirement on the basis that it is a matter that can be properly controlled by the Building Regulations regime and thus it should not be addressed by the Plan. Accordingly it proposes NA 86. However, there will be circumstances where development does not require building regulation approval but has the potential to affect access for the disabled, such as the layout of estates and the surroundings of buildings. I suggest that this criteria is altered along the lines "that the design of the external layout of the development takes into account the needs of all its potential users including disabled persons".

### RECOMMENDATIONS

I recommend:

**(REC.0159) that the DD be modified by the deletion of criterion 5 and its replacement with "that the design of the external layout of the development takes into account the needs of all its potential users including disabled persons".**

**(REC.0160) that no other modification be made to the DD in response to these objections and, in particular, that NA 86 be not accepted.**

## POLICY B23 – ALTERATIONS AND BUILDING EXTENSIONS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA87

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/7	CPRW		315

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/21	Sustainable Gwynedd Gynladwy		315

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/65	Welsh Assembly Government		
B/773/19	Chris Wynne (North Wales Wildlife Trust)		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2073	CPRW		315

### Main Issues

- Restricting the size of extensions
- Restricting front extensions

### Inspector's Considerations and Conclusions

*Whether the Policy should seek to restrict the size of extensions*

1. An objector considers that the Policy should seek to impose a maximum size limit on new extensions and suggests that a restriction of no more than a third increase in the size of the original building has been applied in the past. No

evidence has been presented to support the need for a specific restriction. In terms of aesthetics it seems to me that the need to ensure that any enlargements are "sympathetic to the main building" provides reasonable protection in this respect, enabling decisions to be made on the merits of individual schemes. To add clarity I suggest that the first criterion should include a reference to "scale" – "the design and scale is sympathetic .....". I am also mindful that Policy B21 addresses design issues and that more detailed guidance is available within the Gwynedd Design Guide 2002.

*Whether the Policy should seek to restrict front extensions*

2. Criterion 2 of the DD confines front extensions to porches or other small ancillary structures. Whilst in most situations front extensions will need to be particularly carefully controlled, I concur with an objector that it is not reasonable to adopt a blanket approach to all front extensions. There may be circumstances where a larger front extension may be the most appropriate location for an extension. The objector considers that the introduction of 'scale' as a consideration would provide an adequate safeguard in this respect. For reasons set out in the preceding point I agree that this should be incorporated in the policy, but within the first criterion rather than as a replacement second criterion. I have noted, but do not agree with a counter-objector's view that the criterion should be kept in its DD form save for the qualification of 'normally'.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0161) that the DD be modified by the acceptance of NA 87 as further amended by the insertion of "and scale" in criteria 1., immediately after "the design";**

**(REC.0162) that no other modification be made to the DD in response to these objections.**

## POLICY B24 – BUILDING MATERIALS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA88; NA89

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/22	Sustainable Gwynedd Gynladwy		314

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/66	Welsh Assembly Government		314
B/866/13	Snowdonia National Park		314

### Main Issues

- Whether the meaning of the phrase “overriding reasons” should be clarified.
- Does the Policy address the use of slates appropriately.
- Is the approach to ‘new’ materials too restrictive.

### Inspector’s Considerations and Conclusions

*Whether the meaning of the phrase “overriding reasons” should be clarified*

1. It seems that the change proposed by NA 89 to supporting paragraph 3.5.9 is, in part, intended to elaborate on what constitutes “overriding reasons”, although this is not explicit from the Policy’s wording. Indeed the amended version of the Policy and the supporting text gives rise to confusion in relation to the circumstances in which slate would be envisaged to be required on buildings. The Policy refers to slate being the appropriate roofing material “particularly” for residential properties or extensions to buildings that already have a slate roof. The supporting text suggests that slate can be inappropriate in economic or practical terms for certain types of buildings for instance industrial scale buildings or modern agricultural buildings with wide roofs.

2. Although the stance set out in NA 89 represents a more pragmatic approach than the original version there is need for the Policy to be more clearly expressed. In my view the Policy should be amended so that it requires slate to be used unless the nature of the building or its setting is such that another material would be acceptable. This would avoid the need to identify certain types of buildings where

the requirement for slate would be particularly important and would enable the phrase "overriding reasons" to be omitted.

*Does the Policy address the use of slates appropriately*

3. The Council accepts that the reference to "new" slates is unnecessary, and I agree given that second-hand slates can be an eminently suitable alternative, offering sustainability benefits. NA 88 introduces the necessary deletion.

*Is the approach to 'new' materials too restrictive*

4. The objector considers that the Policy's approach to the use of 'new' materials is too conservative, and suggests that the use of such materials should not be limited only to areas where there is no obvious consistency of materials. It seems to me that the Council is entitled to take the stance it has in relation to supporting paragraphs 3.5.7 and 3.5.8. As it explains, there are parts of the Plan area where the combination of building styles and materials has resulted in a distinctive character and appearance that it wishes to reinforce through the continued use of appropriate materials.

5. TAN12 identifies responding to and reinforcing, where appropriate, locally distinctive patterns and forms of development as one objective of good design. The weight to be attached to each objective will depend on local circumstances and the nature of the proposed development. The TAN also seeks to encourage innovation and creativity. Neither the policy or the supporting text prohibits the use of 'modern' materials, rather it provides a framework for assessing whether a material, and the way it is to be used, is suitable for a particular site. This is made clearer by the deletion of one sentence from paragraph 3.5.8 which is introduced by NA 88. In the context of this concern the objector also criticises the deficiencies of the Council's Design Guide – as it does not form part of the UDP that document does not fall within my remit, and I am not in a position to make recommendations in respect of it.

## RECOMMENDATIONS

**I recommend:**

**(REC.0163) that the DD be modified by the acceptance of NA 88 as further modified by the deletion of the last part of the first sentence of the Policy - "particularly on residential ..... for not doing so" - and its replacement with the wording "other than in circumstances in which the type of building or its particular setting, or the sustainability benefits, are such that another material would be appropriate";**

**(REC.0164) that the DD be modified by the acceptance of NA 89 as further modified by changes to the supporting text that reflect the amendment set out in the preceding recommendation;**

**(REC.0165) that no other modification be made to the DD in response to these objections.**

## **POLICY B25 – SHOPFRONTS AND COMMERCIAL UNITS IN THE TOWN CENTRE**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/23</b>	<b>Sustainable Gwynedd Gynladwy</b>		<b>313</b>

### **Main Issue**

- Should the supporting text require all alterations to shop fronts to reflect the Council's Design Guide.

### **Inspector's Considerations and Conclusions**

1. The objector is concerned that the Design Guide is not of a sufficiently high standard to be relied upon to achieve good shopfront designs. The Guide does not form part of the UDP and, thus, does not fall within my remit. Unitary Development Plans Wales, 2001 encourages authorities to use supplementary planning guidance, including design guides, as a means of setting out more detailed guidance on the way policies will be applied. It also emphasises the need to subject supplementary planning guidance to public scrutiny through formal consultation. It seems to me appropriate that the Plan should rely on supplementary planning guidance to add detail to this Policy. No evidence has been presented to demonstrate that the requirements of supporting paragraph 3.5.12 that all proposals to alter shopfronts should "reflect the principles" set out in the Guide will lead to inappropriate shopfronts. However, it does seem to me that the paragraph should include new shopfronts as well as alterations to existing ones, given that the opening sentence of the policy encompasses new shopfronts.

### **RECOMMENDATIONS**

**I recommend:**

**(REC.0166) that the DD be modified by inserting after "proposals" in paragraph 3.5.12 "for new shopfronts and", also to insert "existing" after "to alter";**

**(REC.0167) that no other modification be made to the DD in response to this objection.**

**POLICY B26 – LANDSCAPING SCHEMES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA90; NA91

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/954/5	Bourne Leisure Ltd	Margaret Baddeley	328
B/76/36	Mike Webb (RSPB)		328

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/4	Environment Agency Wales		328
B/773/23	Chris Wynne (North Wales Wildlife Trust)		328
B/844/8	CPRW		328

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/866/14	Snowdonia National Park Authority		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/954/2012	Bourne Leisure Ltd		328

**Supporters of Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/773/2043	Chris Wynne (North Wales Wildlife Trust)		



## Main Issues

- Whether the title should refer to "Landscape" rather than "Natural Environment".
- Whether "water features" and "wild flowers" should be added to the criteria.
- Are the requirement that any new plants are "locally sourced" and of "native species" reasonable.

## Inspector's Considerations and Conclusions

*Whether the title should refer to "Landscape" rather than "Natural Environment"*

1. The Council agrees that the title of the Policy should be "Enhancing the Quality of the Landscape" and this change is incorporated in NA 90. I concur that the amended title is more precise.

*Whether "water features" and "wild flowers" should be added to the criteria*

2. In response to objections the Council has proposed NA 91 which includes "water features" in the list of landscape features and adds "wild flowers" to the types of plants. These additions improve the clarity of the Plan.

*Are the requirements that any new plants are "locally sourced" and of "native species" reasonable*

3. Whilst it will normally be the case that any landscaping scheme should reflect the native plants of the locality, the objector points out that this is not the case in a landscape characterised by established exotic plants. In such cases it is desirable to ensure that any planting scheme reflects its particular setting. The Council agrees and has offered qualifying text as an addition to criterion 3 in NA 91. This includes the phrase "the current prominent character of the site"; it seems to me that rather than "prominent" the more precise term is "dominant".

4. Objection is raised to the requirements that plants should be "locally sourced" on the basis that they may not always be available or suitable. In response the Council considers that the term should remain as a means of maintaining the current character of sites. I disagree; given that a requirement that plants are native to the site's locality would meet the same objective, it is unduly restrictive to require that they are locally sourced. I also consider the reference to "seeds" introduced by NA 91 to be superfluous.

## RECOMMENDATIONS

**I recommend:**

**(REC.0168) that the DD be modified by the acceptance of NA 90;**

**(REC.0169) that the DD be modified by the acceptance of NA 91 as further amended by the following:**

- **the deletion of the phrase "locally sourced native species or seeds" and replacement with "local native species";**
- **the deletion of the word "prominent" in criteria 3 and replacement with "dominant";**

**(REC.0170) that no other modification be made to the DD in response to these objections.**

**POLICY B28 – DEVELOPMENT ON LAND AT RISK FROM FLOODING**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA92; NA93; NA94

This Section is subject to Further Proposed Changes Nos: NAP72

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/726/5	Tom Brooks		183
B/844/9	CPRW		183
B/869/1	Richard Brown Associates		183

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/15	House Builders Federation		183
B/776/6	Environment Agency		183
B/776/7	Environment Agency		183
B/776/5	Environment Agency		183

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/24	Chris Wynne (North Wales Wildlife Trust)		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/726/2021	Tom Brooks		183

**Note**

- The Council has produced an addendum to its Schedule of Further Proposed Changes which amends the original version of NAP 72, following discussions

that took place during an inquiry session on this Policy. This version was produced in January 2007. It has not been the subject of public consultation but, as it seeks to reflect latest government policy, I have taken it into account in my deliberations. The Council will need to carefully consider any representations that may be made in this respect as part of the proposed modifications process.

### **Main Issues**

- The latest advice in TAN15.
- The terms "very vulnerable", "high risk" and "very high risk".
- The preference for lowest risk sites, as set out in TAN15.
- Previously developed land.
- Assessing flooding risk.
- Is the Policy sufficiently cautious in relation to flood risk.
- The effects of new development on drainage and flooding.
- The effects of climate change.
- Is there need to clarify expression.

### **Inspector's Considerations and Conclusions**

#### *The latest advice in TAN15*

1. Several objectors have expressed concern that the Policy does not reflect the latest source of directly-relevant government advice, which is set out in the July 2004 version of TAN15: Development and Flood Risk. In the light of the revised TAN, which was produced after the Deposit Draft version was published, the Council has introduced NA 92 which proposes significant changes to the Policy. The Council's decision to amend its Plan to reflect new national policy is consistent with the clarification of guidance issued by WAG in a letter dated 1 July 2003. Detailed matters that arise from the revised TAN are addressed in my examination of the issues that follow.

#### *The terms "very vulnerable", "high risk" and "very high risk"*

2. In order to avoid confusion it is important that the terminology used within this Policy is consistent with that which appears in the TAN. There is no reason to use the term "very vulnerable" to refer to a development category rather than "highly vulnerable" which is the term used in the TAN and in the Plan's monitoring section.

3. Similarly, it seems to me the Policy should refer to the categories of land at risk from flooding on the basis of the categories set out in the TAN, using the same widely understood terms of Zone C1, C2 etc. A brief description could then follow, perhaps within parentheses, which could be copied from Figure 1 of the TAN (for instance in the case of C2: "Areas of floodplain without significant flood defence infrastructure"). The reference to "areas" which appears in the first line of the first 2 criteria should also be deleted and replaced with "zone C". These changes of terminology would avoid any potential confusion that could arise in the use of terms and descriptions that differ from the national categorisation system.

*The preference for lowest risk sites, as set out in TAN15*

4. As the Council acknowledges, the revised list of criteria set out in NA 92 is based on sub-section 6.2 of TAN15. However, that sub-section also informs that new development should be "directed away" from zone C towards suitable land in zone A, otherwise to zone B. During the Inquiry the Council accepted that this was an important element of the national advice which ought to be incorporated within the Policy, I agree. As a consequence it has proposed a revised version of NAP 72. This Further Proposed Change contains 3 changes to the Pre-inquiry Proposed Change version. I consider that the wording of the first change which begins "In accordance with ...." could be made simpler, as set out in my recommendation. The reference to "has to be considered" in the second change suggests that the Council has a choice of whether it considers certain schemes - the changes proposed to this paragraph are not necessary and should not be included in the Plan. The third change, which alters criteria 4, adds clarity and should be incorporated.

*Assessing flooding risk*

5. Criterion 4 of the Pre-inquiry Proposed Change version requires the flooding consequences of a particular development to be considered. NAP 72 adds to this to the effect that the scheme is found acceptable in relation to the criteria set out in TAN 15. As I have already inferred, I am mindful that this change has not been the subject of public consultation but I consider that it provides necessary detail on this matter in a manner that establishes a clear standard against which to assess proposals. The absence of commas makes NAP 72 difficult to follow - I suggest that it is re-phrased so that it reads: "found to be acceptable in relation to the tests set out in TAN15.". It will also be necessary to delete "considered" from the end of the NA 92 version of the criterion.

*Is the Policy sufficiently cautious in relation to flood risk*

6. Objections are raised on the basis that there should be greater restriction on developments within areas liable to flood. The TAN recognises the need for balanced judgement, taking into account socio-economic as well as flooding considerations. One objector considers that the Policy, as revised by the Pre-inquiry Proposed Changes, provides excessive discretion for the decision maker to permit development in areas at risk of flooding. In this respect the Policy follows the line set out in national advice in terms of the degree of restriction to be applied to new development in response to the risk of flooding. The objector fears that the policy may be interpreted in a less restrictive way than ought to be the case. Such a consideration is outside my remit; I must assume that the Policy will be properly applied and that the necessary element of judgement which is called for in its application to individual cases will be based on sound, balanced reasoning.

*The effects of new development on drainage and flooding*

7. The Policy, with its direct link to the provisions of TAN15 (introduced by NAP 72), requires the potential consequences of flooding to be assessed not only in relation to any effect on the proposed development but also further afield. This is reinforced by the supporting text. I consider that this deals with the concerns of the objector in relation to the potential impact of development on the natural drainage of an area. In relation to localised flooding, as the objector

acknowledges, Policy B31 addresses matters relating to surface water drainage. Thus, contrary to the views of the objector I conclude that this Policy should not be amended to deal in greater detail with the effects of new development on flooding and drainage.

*The effects of climate change*

8. As the revised version of the Policy is closely based on TAN15, the preparation of which has been informed by climate change considerations, its approach is appropriate. Given that our understanding of this matter is evolving it is possible that the policy will need to be altered in the future. This could be done when the Plan is reviewed or replaced. Moreover, the Policy has been written in such a way that it could accommodate detailed revisions to the TAN without the need to be amended. I am satisfied that it is not necessary for the Plan to elaborate on the subject of climate change.

*Is there need to clarify expression*

9. Concern has been raised regarding a lack of clarity of meaning in relation to passages of the supporting text of the Deposit Draft. I agree that the changes proposed by NA 93 and 94 improve the meaning of the supporting text, noting that the latter change is required only in relation to the English version.

10. For clarity of expression, given the detailed deficiencies that I have identified in NAP 72, I intend to set that Further Proposed Change to one side in my recommendations. Nevertheless much of the content of NAP 72 is considered suitable for inclusion in the Plan and these will be incorporated in my recommendations.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0171) that the DD be modified by the acceptance of NA 92 as further modified by the following:**

- **the deletion of the reference to “very vulnerable” in the opening line of NA 92 and its replacement with “highly vulnerable”;**
- **the deletion of both the references to “very high risk (unprotected land – Zone C2)” in NA 92 and their replacement with “zone C2 (areas of the floodplain without significant flood defence infrastructure)”;**
- **the deletion of the reference to “high risk (protected land – Zone C1)” in NA 92 and its replacement with “zone C1 (areas of the floodplain which are developed and served by significant infrastructure, including flood defences)”;**
- **the deletion of both references to “ the areas” in the opening lines of the first 2 criteria and their replacement with “zone C”;**
- **the insertion of additional sentences before “Proposals for less vulnerable ...” at the beginning of the second paragraph of the Policy as follows - “New development should be directed away from zone C and towards suitable land in zone A, otherwise zone B. The tests outlined in TAN15 will be applied to development within zone C” ;**

- **the deletion of criterion 4 and its replacement with criterion 4 as set out in the January 2007 version of NAP 72 as subject to my conclusions in paragraph 5 of this section;**

**(REC.0172) that the DD be modified by the acceptance of NA 93;**

**(REC.0173) that the DD be modified by the acceptance of NA 94;**

**(REC.0174) that no other modification be made to the DD in response to these objections.**

**POLICY B29 – CONTAMINATED LAND OR BUILDINGS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA95

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/67</b>	<b>Welsh Assembly Government</b>		



**POLICY B30 – DEVELOPMENT THAT DEAL WITH HAZARDOUS SUBSTANCES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/67</b>	<b>Welsh Assembly Government</b>		

## POLICY B31 – INCREASING WATER SURFACES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA96

This Section is subject to Further Proposed Changes Nos: NAP85

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/726/6	Tom Brooks		318

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/773/25	Chris Wynne (North Wales Wildlife Trust)		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2074	CPRW		318

### Note

- The title of Policy B31 is "Increasing Surface Water" not that which appears in the above box heading.

### Main Issues

- Does the Policy provide adequate control over surface water disposal.
- Mode of expression.

### Inspector's Considerations and Conclusions

*Does the Policy provide adequate control over surface water disposal*

1. The objector considers that the Policy, as amended by NA 96, should be altered by the addition of text which requires proposals to demonstrate that it would not lead to an increase in the risk of flooding, or increase in the problem of surface water run-off. Whilst such considerations will be important in relation to particular development proposals, I agree with the Council that they are implicit in the requirements of the Policy, as amended by NA 96. Such considerations fall within the description of flood minimisation or mitigation measures referred to in the opening sentence of the Policy. Thus the suggested text is not necessary and would run counter to the aim of achieving a concise Plan.

*Mode of Expression*

2. The Council has introduced NAP 85 to address an error identified by objectors – it corrects the mistaken striking out of “will be refused” that appeared in NA 96. In considering the requirements of the Policy, it is evident that it contains a typographical error – rather than seeking to “reduce the quality and rate” of water run-off I assume that the word that I have underlined should have read “quantity”, although “volume” is a more common term in this context.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0175)that the DD be modified by the acceptance of NA 96 as amended by NAP 85 and as further amended by the deletion of “quality” and the insertion of “volume”;**

**(REC.0176)that no other modification be made to the DD in response to these objections.**

## **POLICY B32 – DEVELOPMENT THAT CREATES POLLUTION OR NUISANCE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/34</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>130</b>

### **Note**

- Although not listed above, I have taken into account Objection B/731/14 and the Council's response set out its Proof of Evidence 611.

### **Main Issue**

- Does the Policy deal adequately with light pollution.

### **Inspector's Considerations and Conclusions**

1. One objector expresses the desire that the Policy incorporates the good practice examples of Swale Borough Council Local Plan 1994 and the East Hampshire District Council Local Plan on light pollution. Another objector calls for the unnecessary use of light, including for decorative purposes, to be curtailed. Neither objector has specifically commented on the perceived shortcomings of Policy 32 which includes light pollution among the types of pollution it seeks to address.

2. Although it is not essential that the Plan deals with light pollution independently of other types of pollution it seems to me that this would be the best course of action. PPW requires UDPs to include policies on lighting, including the control of light pollution. It identifies interests to be protected and the need to strike a balance between conflicting interests. In my view both the Policy and supporting text pay inadequate attention to the particular issues that arise in relation to lighting, for instance the need identified in PPW to retain dark skies where appropriate. An objector's concern regarding the increased use of decorative light, ranging from use by public bodies to private individuals, is another issue that the Council has not addressed. It seems that this deficiency is best dealt with by the omission of lighting considerations from B32 and the inclusion of a new policy on this subject, based on the advice contained in PPW, particularly paragraph 13.13.2. In its proof of Evidence 611 the Council acknowledges the value of a good practice guide produced in 1997, but there is no evidence that this has influenced the Plan's content thus far.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0177)that the DD be modified by the deletion of all references to lighting in Policy B32 and its supporting text and the introduction of a new policy on 'lighting and light pollution' which should be based on that set out in PPW;**

**(REC.0178)that no other modification be made to the DD in response to these objections.**

## POLICY B33 – AVOIDING THE SPREAD OF INVASIVE SPECIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA97; NA98

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/786/8	Jill Jackson		312
B/786/9	Jill Jackson		312
B/340/1	Cynefin Environmental Consultants		312

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/773/26	Chris Wynne (North Wales Wildlife Trust)		

### Main Issues

- Whether the word “polluted” should be replaced by “contaminated”.
- Whether Ragwort should be identified as an invasive species.

### Inspector’s Considerations and Conclusions

*Whether the word “polluted” should be replaced by “contaminated”*

1. The Council accepts that, in the context of this Policy, the term “contaminated” is more suitable than “polluted”. Although it alters the term as it appears in the Policy by introducing NA 97, it fails to change it in relation to the third line of paragraph 3.6.17. I assume that this is an oversight which ought to be corrected.

*Whether Ragwort should be identified as an invasive species*

2. I have assumed that as the Policy refers to “invasive” species, the reference to “intrusive” species in the opening line of the supporting text is in error, and should be in line with the Policy’s terminology. Objectors point out that Ragwort should not be identified as an invasive species. The Council agrees and offers NA 98 in response.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0179) that the DD be modified by the acceptance of NA 97;**

**(REC.0180) that the DD be modified by the acceptance of NA 98 as further modified by the following:**

- **the deletion of "polluted" from line 3 of paragraph 3.6.17 and replacement with "contaminated";**
- **the deletion of "intrusive" from line 1 of paragraph 3.6.17 and replacement with "invasive";**

**(REC.0181) that no other modification be made to the DD in response to these objections.**

## NEW POLICIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA99; NA100

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/76/23	Mike Webb (RSPB)		319
B/76/37	Mike Webb (RSPB)		350
B/76/34	Mike Webb (RSPB)		348

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/756/2089	Environment Watch Wales & the Borders		155

### Supporters of Proposed Change

Ref No	Name	Agent	Response Ref
B/844/2066	CPRW		
B/1448/2001	Robert Gray Williams		
B/765/2006	Dominique Sammut		
B/564/2006	AJ Underwood		
B/844/2065	CPRW		
B/1433/2004	Penny Perrin		
B/559/2005	M. Genevieve Singabryen		
B/558/2003	A.E. Pennell		
B/562/2006	Michael Roberts		

### Note

- This section deals with 2 new policies proposed by the Council for Chapter B of the Plan. These are introduced by NA 99 and NA 100 in the Pre-inquiry Proposed Change version and are addressed individually below and identified



by the NA reference number. Also addressed are 2 new policies suggested by an objector but not proposed by the Council.

## **NEW POLICY NA 99**

### **Note**

- Although not listed in the above table I have taken into account objections B/720/1 and B/866/12 together with the Council's responses, in Proofs of Evidence 195 and 646 respectively, in my assessment of this New Policy.

### **Main Issue**

- Protecting the National Park from harmful development.

### **Inspector's Considerations and Conclusions**

1. This Policy is introduced in response to a concern that the Plan does not seek to protect the special qualities of the National Park from harmful developments within the Plan area. In proposing this Policy the Council acknowledges that the statutory duty to have regard to National Park purposes applies to activities affecting such areas, whether the activities take place within or outside the designated area. In objecting to the DD the Snowdonia National Park Authority considers that a wider range of potential impacts should be identified than just visual, for instance traffic and air- or water-borne pollutants. It seems to me that the Policy has correctly concentrated on the statutory purposes of National Parks that are relevant to areas that lie outside the designated area – the conservation and enhancement of its natural beauty. There are other policies within the Plan as well as separate regulatory regimes that seek to address the other impacts that the objector has mentioned.

### **RECOMMENDATION**

**I recommend:**

**(REC.0182) that the DD be modified by the acceptance of NA 99;**

**(REC.0183) that no other modification be made to the DD in response to these objections.**

## **NEW POLICY NA 100**

### **Notes**

- This sub-section deals with objection B/76/23.
- This sub-section of the report should be read in conjunction with the section dealing with Policy B20.
- One counter-objection has been raised to this policy (B/756/2089), but no reason has been provided.

### **Main Issue**

- Whether a new policy is required to address habitat linkages.

### **Inspector's Considerations and Conclusions**

1. In response to Policy B20 the objector considers that the Plan should reflect the requirements of Regulation 37 of The Conservation (Natural Habitats, &c.) Regulations 1994. It is suggested that the model policy suggested in the Good Practice Guide, 'Planning for Biodiversity', produced by the RTPI in 1999 should be used. This new policy was proposed by the Council in order to address the objection. Whilst I agree that the Plan ought to reflect the duty imposed by regulation 37 of the above legislation, for reasons I set out in the section of my report dealing with B20, this should be done by amending that existing policy rather than by the introduction of a new one.

### **RECOMMENDATION**

**I recommend:**

**(REC.0184)that no modification be made to the DD in response to this objection and, in particular, that NA 100 be not accepted.**

## **NEW POLICY ON DERELICT INDUSTRIAL LAND**

### **Note**

- This sub-section deals with objection B/76/37.

### **Main Issues**

- The nature conservation value of derelict industrial land.

### **Inspector's Considerations and Conclusions**

1. An objector points to the substantial nature conservation value of some derelict industrial land, and suggests that it ought to be protected from insensitive reclamation schemes by a specific policy. The re-use of previously developed land is the subject of Policy C3. The Pre-inquiry Proposed Change version of the policy encourages the re-use of such land subject to conformity with the Plan's objectives and development strategy. This has the effect of providing a link to matters relating to nature conservation, requiring the decision maker to take into account the range of policies that deal with this topic when assessing any planning application on previously developed land. Therefore, an additional policy would lengthen the Plan unnecessarily.

### **RECOMMENDATION**

**I recommend:**

**(REC.0185) that no modification be made to the DD in response to this objection.**

## **NEW POLICY ON SUPPLEMENTARY PLANNING GUIDANCE**

### **Note**

- This sub-section deals with objection B/76/34.

### **Main Issue**

- Supplementary planning guidance on biodiversity.

### **Inspector's Considerations and Conclusions**

1. An objector considers that the Plan ought to include a Policy that would provide an undertaking to produce SPG on biodiversity. Unitary Development Plans Wales, 2001, recognises the useful role that SPG can play in supplementing policies and proposals but also states that policies should not include statements of intent. Although the Council has indicated that it is considering the potential of preparing SPG, as no such document has been prepared on biodiversity it would not be appropriate to include a reference to this within a policy. Such a reference could be introduced when the Plan is reviewed/replaced, assuming that the Council has adopted SPG by that time.

### **RECOMMENDATION**

**I recommend:**

**(REC.0186) that no modification be made to the DD in response to this objection.**

## MONITORING

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

This Section is subject to Further Proposed Changes Nos: NAP91; NAP92; NAP93

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/27	Chris Wynne (North Wales Wildlife Trust)		345
B/76/43	Mike Webb (RSPB)		345
B/76/35	Mike Webb (RSPB)		345
B/76/38	Mike Webb (RSPB)		345
B/76/41	Mike Webb (RSPB)		345
B/76/42	Mike Webb (RSPB)		345
B/76/40	Mike Webb (RSPB)		345

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/68	Welsh Assembly Government		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/24	Sustainable Gwynedd Gynladwy		
B/790/17	Gwynedd Archaeological Trust		
B/76/39	Mike Webb (RSPB)		

### Notes

- I have commented on the merits of the Further Proposed Changes proposed by the Council even though they have not been the subject of public consultation. This is on the basis that they appear to be minor changes. I am mindful that the changes will be the subject of the proposed modifications process and that any consultation responses received to these changes at that time will need to be carefully considered.

## Main Issues

- Planning application numbers as indicators of policy performance.
- The floodplain target.
- The biodiversity target.
- Whether species should be included in the policy performance indicators.

## Inspector's Considerations and Conclusions

### *Planning application numbers as indicators of policy performance*

1. An objector suggests that it is not the number of applications for development that are received that is of importance but the percentage refused or modified in the interests of protected sites such as AONBs. I agree. However, save for a few exceptions which ought to be identified and changed by the Council, the policy performance indicators that use planning applications are based on applications *approved* rather than *received*. However, it seems to me that the indicators would be more informative were they to include, in relation to a particular type of application, the total number of applications determined and the proportion of those that are approved. For the same reason, this approach should also be applied in the case of indicators based on appeal decisions.

### *The floodplain target*

2. An objector suggests that the impact on floodplains should be added to the indicators listed on pages 70 and 74 of the DD. In response the Council acknowledges the importance of floodplains and suggests the inclusion of such an indicator through NAP 93. However, in the absence of a policy within Chapter B of the Plan which explicitly seeks to protect floodplains, there does not appear to be a reason for monitoring the rate of development within such areas. The basis of referring to 2001 as a base year in this context is not clear to me given that the Plan had not been produced then, but this is a matter of detail which does not alter my view that, on the basis of the available evidence, there is no justification for including this performance indicator.

3. An objector suggests that the indicator relating to highly vulnerable development on land at risk of flooding should be deleted. I disagree given the importance attached by government, reflected in Policy B28, on strictly controlling new development within areas at risk of flooding.

### *The biodiversity target*

4. An objector argues that a monitoring target should secure that there is no damage or destruction to international, national or local sites of nature conservation or of species or habitats of acknowledged importance in Gwynedd. This is provided for in section 3.7 of the DD. The Council accepts that in relation to the biodiversity target the reference to "direct" impact is too restrictive, accordingly it has introduced NAP 92 which adds "indirect" impacts to the target. I agree that this change should be incorporated.

*Whether species should be included in the policy performance indicators*

5. The Council accepts that, in relation to the policy performance indicator that deals with Natur Gwynedd, it ought to include development that affects species as well as habitats, and I agree. This change is addressed by NAP 91 and is consistent with the change to Policy B20 introduced by NA 82.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0187) that the DD be modified by the acceptance of NAP 91;**

**(REC.0188) that the DD be modified by the acceptance of NAP 92;**

**(REC.0189) that the DD be modified by ensuring that all the references to planning applications and appeals in the 'indicators of policy performance' are expressed as the total number determined and the proportion approved/allowed;**

**(REC.0190) that no other modification be made to the DD in response to these objections and, in particular, that NAP 93 be not accepted.**

## ABERCASEG SCHOOL PROTECTED OPEN SPACE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA247

### Objections to Deposit Draft

Objection No	Ref	Name of Objector	Agent	Response Ref
B/756/2112		Environment Watch Wales & the Borders		112

### Note

- The above objection is to the Pre-inquiry Proposed Change, not the Deposit Draft.

### Main Issue

- Whether the area of Protected Open Space should be reduced.

### Inspector's Considerations and Conclusions

1. In response to an objection raised to NA 247 the Council explains that an identified potential need for the land in question to facilitate a school expansion outweighs the role of the open space to the area's character and appearance. It seems to me that a significant tract of land would remain protected and thus the proposed change is not unacceptable.

### RECOMMENDATIONS

I recommend:

**(REC.0191) that the DD be modified by the acceptance of NA 247;**

**(REC.0192) that no other modification be made to the DD in response to this objection.**



## ABERDARON CONSERVATION AREA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/575/22	Aberdaron Community Council		560

### Main Issue

- Should the Plan amend the Aberdaron Conservation Area.

### Inspector's Considerations and Conclusions

1. The objector questions the boundaries of the Conservation Area on the basis that it excludes some historic houses whilst including modern developments. In response the Council rightly points out that designating, or for that matter amending, conservation areas is not a matter for the UDP. This is made clear in PPW. No change to the Plan is necessary.

### RECOMMENDATION

I recommend:

**(REC.0193) that no modification be made to the DD in response to this objection.**

## ESTATE NEAR Y BONT, ABERERCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/665/1	Llannor Community Council		368

### Main Issues

- Whether land at Ger y Bont estate should be designated as Protected Open Space.
- Whether the land adjacent to this designated area should be designated as a Protected Play Area.

### Inspector's Considerations and Conclusions

*Whether land at the Ger y Bont estate should be designated as Protected Open Space*

1. The site is an irregular shaped tract of land within the housing estate of Ger y Bont. For the most part it bounds residential curtilages and a garage block. It is separated from the nearest highway by a field. The Council considers the site to make a positive contribution to the character of the village, but does not describe the particular attributes which it seeks to protect. The site abuts the Development Boundary of the village beyond which lies undulating countryside. In this context, this open area located behind residential properties adds little to the character of the area. It does not merit designation as Protected Open Space.

*Whether the land adjacent to this designated area should be designated as a Protected Play Area*

2. Although the objector has suggested that it would wish to see the Protected Open Space designation described above, being applied to the site which is nearer the road instead, it is clear from its comments that what is envisaged is an area for recreational purposes by children. The Protected Open Space designation is not intended to meet such a purpose, rather it is as a Protected Play Area that this aim would be met. However, as the Council points out, this designation supported by Policy CH40, seeks to safeguard existing open spaces of recreational value. As the site in question does not fulfil this function its designation would be contrary to the approach of the Policy. Moreover, as there appears to be no firm intention to develop the site for this purpose it would be unreasonable to seek to confer on it such protection.

**RECOMMENDATION**

**I recommend:**

**(REC.0194) that the DD be modified by the deletion of the designation of the site at Ger y Bont as a Protected Open Space;**

**(REC.0195) that no other modification be made to the DD in response to this objection.**

## BETWEEN ABERSOCH SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/69	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Abersoch.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tract of open land that separates the 2 distinct built-up elements that form Abersoch, and which lies within the Llyn AONB. A formal designation of this land as a green barrier is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0196) that no modification be made to the DD in response to this objection.**

## LANDSCAPE CONSERVATION AREA TO THE EAST OF BALA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA391

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/34	CCW		616

### Note

- In addition to the objection listed above I have also taken into account objection B/844/51.

### Main Issue

- Whether an area to the east of Bala should be designated as a Landscape Conservation Area.

### Inspector's Considerations and Conclusions

1. The DD version of the Plan included in a list of LCAs set out in Policy B10 "Area to the east of Bala", but the site was not shown on a proposals map. This error was corrected by NA 391 which maps out the boundaries of this LCA. This change should be incorporated into the Plan.

### RECOMMENDATIONS

I recommend:

**(REC.0197) that the DD be modified by the acceptance of NA 391;**

**(REC.0198) that no other modification be made to the DD in response to these objections.**

## TY'N LON & BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/64	Environment Watch Wales & the Borders		114

### Note

- In its Proof of Evidence 114 the Council has summarised the above objection as relating to the need for a green barrier between Ty'n Lon and Llandygai. On the basis of the objector's original submission, the latter settlement ought to read 'Bangor'. Furthermore, the objector has referred to 'green belt' as well as 'green barrier'.

### Main Issue

- Whether there is a need for a green belt or a 'green barrier' between Ty'n y Lon and Bangor.

### Inspector's Considerations and Conclusions

1. PPW informs local planning authorities in parts of Wales which are subject to significant pressures for development that they must consider Green Belt designation. The need for such a designation must be shown by demonstrating that normal planning policies would not provide the necessary protection. The Council take the view that the circumstances within the Plan area are such that Green Belts are not necessary. I find no reason to reach a different view.

2. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies to protect land outside Development Boundaries, permitting development only in exceptional circumstances. I agree that the Plan provides adequate protection for the significant tract of open land that separates the 2 distinct built-up elements that form Ty'n y Lon and Bangor, reinforced by the physical barrier provided by Ffordd Treborth. Formal designation of this land is not necessary.

**RECOMMENDATION**

**I recommend:**

**(REC.0199) that no modification be made to the DD in response to this objection.**

**GARTH/GLYNNE ROAD, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1345/3</b>	<b>Margaret Player</b>		<b>502</b>

**Note**

- This sub-section is an addition to the section provided in the Council's skeleton report to deal with objections to the omission of sites as designated Protected Open Space

**Main Issues**

- Whether the site at Garth/Glynne Road should be designated as Protected Open Space.
- Whether the site at Garth/Glynne Road should be designated as a Protected Play Area.

**Inspector's Considerations and Conclusions**

*Whether the site at Garth/Glynne Road should be designated as Protected Open Space*

1. The objector considers that the site should be designated as an area of Protected Open Space rather than as a Redevelopment Site. The Council explains that it is not the Plan's intention to promote new development on all parts of the site and that the extent of the redevelopment area reflects linkages between different parts of it. The land in question includes formal recreational provision and is acknowledged as vital to the area's successful redevelopment. The Council advises that the Development Brief has been amended to reflect the important contribution of the site to the area.

2. Given that the Council does not dispute its importance as open space, it appears to me appropriate that part of the site should be designated in the Plan as Protected Open Space. Such a designation would offer greater protection than a clause within the development brief, and would provide clearer guidance to prospective developers. There seems to be no reason to prevent the site continuing to be identified on the Inset Plan as a Redevelopment Site, should the Council deem it necessary. As I explain in the above section of my report on Garth Gardens, whether this is done by applying cross-hatching over the yellow shading on the Inset Map or by some other means, such an additional annotation on the map or a comment in the development brief, would be for the Council to determine.



*Whether the site at Garth/Glynne Road should be designated as a Protected Play Area*

3. The Council acknowledges that part of the land in question serves as an important local facility for formal recreation. For the same reasons as I set out in the preceding paragraph, I consider that this part of the site should be identified as a Protected Play Area at the proposed modifications stage.

**RECOMMENDATIONS:**

**I recommend:**

**(REC.0200) that the DD be modified by identifying part of the Garth/Glynne Road site as Protected Open Space;**

**(REC.0201) that the DD be modified by identifying the remainder of the Garth/Glynne Road site as Protected Play Area;**

**(REC.0202) that no other modification be made to the DD in response to this objection.**

## GARTH GARDENS, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1345/4	Margaret Player		629

### Note

- In addition to the objection recorded above I have also taken into account objection B/750/1 by John Griffith Roberts and the Council's response in its Proof of Evidence 502.

### Main Issue

- Whether Garth Gardens should be designated as Protected Open Space.

### Inspector's Considerations and Conclusions

1. The objector considers that the site should be designated as an area of Protected Open Space rather than as a Redevelopment Site. The Council explains that it is not the Plan's intention to promote new development on all parts of the site and points to the fact that the Hirael Bay development brief, which will be relied on to guide the area's redevelopment, recognises the site as an important public open space. From my reading of the Brief which was produced alongside the Deposit Draft version of the Plan, it is evident that Garth Gardens is not mentioned among the 3 public open spaces that should be protected and integrated into any new development. The Council advises in its Proof of Evidence 502 that the Development Brief has been amended in this respect.

2. The Hirael Bay redevelopment area comprises a collection of discrete tracts of land centred on the Hirael Bay harbour. Garth Gardens lies within an area physically separated from the main part of the redevelopment area and includes the open space area as well as the pier, a listed building. Given that the Council does not dispute the importance of the site as open space, it appears to me appropriate that it is designated in the Plan as Protected Open Space. Such a designation would offer greater protection than a clause within the development brief, and would provide clearer guidance to prospective developers. There seems to be no reason to prevent the site continuing to be identified on the Inset Plan as a Redevelopment Site, should the Council deem it necessary. Whether this is done by applying cross-hatching over the yellow shading on the Inset Map or by some other means, such an additional annotation on the map or a comment in the development brief, would be for the Council to determine.

**RECOMMENDATIONS:**

**I recommend:**

**(REC.0203) that the DD be modified by identifying Garth Gardens as Protected Open Space.**

**(REC.0204) that no other modification be made to the DD in response to this objection.**

## SHORES OF THE MENAI STRAITS, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/324/1	Bangor City Council		102
B/135/1	Mrs J Forsyth		201

### Notes

- Although not mentioned in the above banner heading I deal with Pre-inquiry Proposed Change NA 376 within this section of the report.
- In addition to the objections listed above I have also taken into account representations B/760/10, B/844/47, B/874/1 and B/952/2035 and the Council's Proofs of Evidence 195 and 617.
- This section of the report should be read in conjunction with the section dealing with Policy B10.
- Objection B/135/1 suggests that an independent local authority be set up to deal with the sensitive coastlines along the Menai Straits, and objection B/844/47 also contends that the both sides of the Straits should be administered as a single entity. As the matter of local government organisation is not a matter for the UDP I do not intend to comment further on this, other than to note that the Council has discussed cross-boundary issues with its neighbouring authority during the Plan's preparation and that there are policies designed to protect the Straits and the northern shore. Several objectors also advance a case for designating the southern shores of the Straits as an AONB – as such a designation is not a matter for the UDP I do not comment further on this suggestion.

### Main Issues

- Whether the designation is based on objective analysis.
- Whether the landscape character of the area is worthy of designating as a Landscape Conservation Area.
- Whether the boundaries of the designation have been appropriately drawn.

### Inspector's Considerations and Conclusions

*Whether the designation is based on objective analysis*

1. The designated LCAs as identified in the Deposit Draft version of the Plan are based on the findings of a LANDMAP information system methodology undertaken in 1999. Despite being designated as a LCA in earlier development plans the southern shore of the Menai Straits was not included in that version of the UDP. The Council explains that this was because there was only a small correlation between the higher evaluated aspect areas and the LCA boundary. Several

objections were raised to the Deposit Draft on the basis of the area's omission from the LCA sites. The Council considered the evidence produced by these objections and has introduced NA 58 and NA 376 which includes the area in the list of LCAs as set out in B10 and identifies the boundaries on a proposals map.

2. PPW recognises that local non-statutory site designations can add value to the planning process, particularly if they are informed by community participation and reflect community values. However, it also requires that such designations are soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site.

3. In this case no evidence has been presented that the designation is based on an adequate assessment, indeed the reason for its designation according to the Table listing the changes in the Pre-inquiry Proposed Change version of the Plan is "In order to reflect the area's importance to the local community". Without an objective assessment, it is not possible to establish the merits of the area's inclusion as a LCA. In the absence of a sound, evidenced based justification the appropriateness of the area's designation and the precise boundaries cannot be established. An important element of the justification for Policy B10 is that the findings of the LANDMAP assessment and the Landscape Strategy would identify the particular characteristics of the landscape that make the area worthy of protection. Such information could then be used to inform the design of proposed developments and would assist in the objective assessment of such schemes against the Policy's criteria and the LANDMAP assessment.

*Whether the landscape character of the area is worthy of designating as a Landscape Conservation Area*

4. Objectors contend that the area is worthy of designation and needs the protection afforded by Policy B10. They point out that the area has been designated as a LCA in adopted development plans. This does not, in itself, justify its inclusion in the UDP even though there may not have been any significant change in the nature of the landscape. It is necessary to determine the matter in the light of the currently available evidence, including latest national policy.

5. The relationship of the area to other designated areas, including the AONB, the National Park and the Special Area of Conservation, is noted, but I am also mindful that the Plan contains policies that specifically seek to protect the setting of such areas. Furthermore Policy B13 seeks to protect the open coastline and there are policies that seek to protect the countryside and to achieve good design in various types of development. Therefore this area will enjoy protection from certain harmful effects via these policies. Objectors argue that the area has a particular quality and prominence which means that there is a justification to designate it as a LCA. Moreover, it is contended that its prominence, including from across the Straits, and the intense development pressures that the area is likely to face means that it is in particular need of protection.

6. I appreciate that there are particular characteristics within this relatively intimate landscape that have particular quality that is widely appreciated. I have also noted the argument that LANDMAP methodology may not do justice to this unusual situation and that the March 2006 draft of the Gwynedd Landscape Strategy Report, which is based on a refined LANDMAP methodology, does suggest that parts of the identified Menai Straits area should be designated. These areas

are an area centred on the Penrhyn Estate and an area of the Vaynol Park and represent a significantly smaller area than the Council proposes to designate as shown in NA 376. An objector suggests that a seascape methodology would be more appropriate for this narrow tract of land. Whilst LANDMAP is commended by PPW it does not rule out other methodologies provided that they provide a 'formal scientific assessment'.

7. In the absence of a rigorous landscape assessment, I agree with an objector who considers that the additional level of protection conferred on an area by being designated a LCA can only be justified if supported by objective analysis. On the basis of the latest available evidence it may be that only elements of the area identified in NA 376 should be designated as a LCA. Alternatively, the Council may wish to undertake a further assessment of the area.

*Whether the boundaries of the designation have been appropriately drawn*

8. Objectors argue that the boundaries of Menai Straits LCA have been drawn too tightly and exclude areas of particular quality. However, it follows that the lack of an adequate methodology on which to base the decision to designate the area identified by the Pre-inquiry Proposed Change means that it is not possible to objectively analyse and decide on where the boundaries of any designation should fall.

## **RECOMMENDATION**

**I recommend:**

**(REC.0205) that no modification be made to the DD in response to these objections, in particular that NA 376 be not accepted (unless the designation of the 'Area along the Menai Straits' is soundly based on a formal scientific assessment, and in which case the boundaries of any such designation should be based upon the assessment).**

## SEMI -NATURAL WOODLAND ALONG THE MENAI , BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/41	CCW		621

### Main Issue

- The area of semi-natural woodland identified on the Proposals Map along the Menai Strait.

### Inspector's Considerations and Conclusions

1. The objector advises that there are more extensive areas of semi-natural woodland along the shores of the Menai Strait than are identified on inset map 6. In response the Council explains that, as it has yet to receive amended information to support this contention, no modification to the Plan can be made. However, it suggests that modifying the Plan in the way envisaged by the objector could be readily done once the supporting information is to hand. On this basis, and given that the necessary information is in the possession of the Countryside Council for Wales, it seems that this matter can be resolved during the preparation of the Proposed Modifications version of the Plan. This would also provide an opportunity to address an apparent anomaly in the depiction of this area of woodland in the Proposals Map 1 and Inset 6, the latter suggests that the area overlaps both maps, the former shows it to be contained wholly outside the inset area.

### RECOMMENDATION

I recommend:

**(REC.0206) that the DD be modified by amending the area identified as ancient semi-natural woodland on Inset Map 6 and Proposals Map 1 in accordance with the latest available information.**

**NEAR FFERM GERLAN, CAE Y WERN, BETHESDA**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/694/1</b>	<b>Huw Jones</b>		<b>45</b>

**Main Issue**

- Whether the land at Gerlan Farm should be designated as a Protected Open Space.

**Inspector's Considerations and Conclusions**

1. The site forms part of a much larger area of land at Gerlan Farm that is designated as Protected Open Space. It is evident that the objector opposes the inclusion of the site in question within the designation as it would hinder his ambition to erect a dwelling on the site. The land in question is set back behind a residential curtilage from the nearest road and as a consequence is relatively well screened from public view. Furthermore, its contribution to the openness of the area is minor in relation to the remainder of the designated open space which lies on rising ground as well as the areas of countryside that lie beyond the nearby development boundaries. It does not merit designation as Protected Open Space.

2. The Council raises concerns regarding the suitability of the access to serve housing development on the site and the objector has referred to the limitation imposed by an overhead electricity line. These are not matters for me. The site would represent a windfall site and would be assessed against the policies of the development plan and any other material considerations in the context of a planning application.

**RECOMMENDATION**

**I recommend:**

**(REC.0207) that the DD be modified by omitting the site from designation as Protected Open Space.**



## REAR OF CAE'R BERLLAN, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/820/6	Lorna Todd		628

### Main Issue

- Whether land to the rear of Cae'r Berllan should be designated as Protected Open Space

### Inspector's Considerations and Conclusions

1. The objector is concerned that the continuation of the recent pattern of development in Bethesda will harm the area's built heritage and local community identity, and thus conflict with the aim of the UDP. To prevent the gradual erosion of the area's character and integrity the objector contends that open spaces should be protected, and to this end land to the rear of Cae'r Berllan should be designated as Protected Open Space in the Plan. In response the Council considers that the contribution of the land in question to the area's character is not of such importance as to justify designating it as Protected Open Space under the provisions of Policy B11.

2. PPW informs that UDPs should protect from development, open space that has a significant amenity or recreational value to the community. In this case the Council has decided that such protection is not necessary. It points to a raft of policies that together seek to protect the social, linguistic and cultural cohesion of communities as well as safeguarding its landscape quality. The site runs southwards from Cae'r Berllan, a terrace of traditional cottages, and is set back behind other residential properties from the nearby A5. It has no particular characteristics that would justify its designation as Protected Open Space, moreover, the close proximity of the Development Boundary in several directions means that there are large tracts of open countryside nearby.

### RECOMMENDATION

**I recommend:**

**(REC.0208) that no modification be made to the DD in response to this objection.**

## LAND SOUTH OF GERLAN NEW ROAD, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/820/4	Lorna Todd		628

### Main Issue

- Whether land to the south of Gerlan New Road, bordered by Afon Ffrydlas should be designated as Protected Open Space.

### Inspector's Considerations and Conclusions

1. The objector is concerned that the continuation of the recent pattern of development in Bethesda will harm the area's built heritage and local community identity, and thus conflict with the aim of the UDP. To prevent the gradual erosion of the area's character and integrity the objector contends that open spaces should be protected, and to this end land to the south of Gerlan New Road, bordered by Afon Ffrydlas should be designated as Protected Open Space in the Plan. In response the Council considers that the contribution of the land in question to the area's character is not of such importance as to justify designating it as Protected Open Space under the provisions of Policy B11.

2. PPW informs that UDPs should protect from development, open space that has a significant amenity or recreational value to the community. In this case the Council has decided that such protection is not necessary. It points to a raft of policies that together seek to protect the social, linguistic and cultural cohesion of communities as well as safeguarding its landscape quality. Given the extent of land designated as Protected Open Space in this locality there is no justification for designating further land.

### RECOMMENDATION

I recommend:

**(REC.0209) that no modification be made to the DD in response to this objection.**

**BETWEEN ABERCASEG ROAD & GERLAN ROAD, BETHESDA**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/820/3</b>	<b>Lorna Todd</b>		<b>628</b>

**Main Issue**

- Whether land between Abercaseg Road and Gerlan Road should be designated as Protected Open Space.

**Inspector's Considerations and Conclusions**

1. The objector is concerned that the continuation of the recent pattern of development in Bethesda will harm the area's built heritage and local community identity, and thus conflict with the aim of the UDP. To prevent the gradual erosion of the area's character and integrity the objector contends that open spaces should be protected, and to this end land between Abercaseg Road and Gerlan Road should be designated as Protected Open Space in the Plan. In response the Council considers that the contribution of the land in question to the area's character is not of such importance as to justify designating it as Protected Open Space under the provisions of Policy B11.

2. PPW informs that UDPs should protect from development open space that has a significant amenity or recreational value to the community. In this case the Council has decided that such protection is not necessary. It points to a raft of policies that together seek to protect the social, linguistic and cultural cohesion of communities as well as safeguarding its landscape quality. The site bounds an area designated as Protected Open Space. However, bearing in mind the site's relationship to the low density built form along this side of Abercaseg Road and the prominence of open areas of land nearby that are outside the Development Boundaries I concur with the Council's view that the site does not merit designating as Protected Open Space.

**RECOMMENDATION**

**I recommend:**

**(REC.0210) that no modification be made to the DD in response to this objection.**

## LAND NORTH OF GERLAN NEW ROAD, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/820/5	Lorna Todd		628

### Main Issue

- Whether land north of Gerlan New Road and south of Carneddi Road should be designated as Protected Open Space.

### Inspector's Considerations and Conclusions

1. The objector is concerned that the continuation of the recent pattern of development in Bethesda will harm the area's built heritage and local community identity, and thus conflict with the aim of the UDP. To prevent the gradual erosion of the area's character and integrity the objector contends that open spaces should be protected, and to this end land between Gerlan New Road and Carneddi Road should be designated as Protected Open Space in the Plan. In response the Council considers that the contribution of the land in question to the area's character is not of such importance as to justify designating it as Protected Open Space under the provisions of Policy B11.

2. PPW informs that UDPs should protect from development, open space that has a significant amenity or recreational value to the community. In this case the Council has decided that such protection is not necessary. It points to a raft of policies that together seek to protect the social, linguistic and cultural cohesion of communities as well as safeguarding its landscape quality. The site fronts Carnedd Road, and is bounded on the 3 remaining sides by an area designated as Protected Open Space. The logic behind the precise boundary delineation in this area is not clear to me. However, there is no compelling case for extending the designated area to include all or part of the site in question.

### RECOMMENDATION

**I recommend:**

**(REC.0211) that no modification be made to the DD in response to this objection.**

## NORTH OF COETMOR NEW ROAD, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/23	RCH Douglas Pennant	Guy D Evans	52

### Note

- Objection B/952/25 is also addressed within this section

### Main Issue

- Whether land to the north of Coetmor Road should be designated as Protected Open Space.

### Inspector's Considerations and Conclusions

1. The objector contends that the site's designation as Protected Open Space conflicts with the criteria set out in Policy B11 on which such allocations ought to be based. Whilst I note that the site is in private ownership this is not a crucial consideration given that the Policy seeks to protect areas that contribute to the character and appearance of an area. Among the designated area's attributes, according to the Council, is that it marks the transition in the area's character from urban to rural, and that part of the designated area is a children's play area. The play area does not encroach on the objection site. The proximity of the site to the open countryside that bounds the settlement means that its presently open nature has no more than a modest effect on the character of this part of Bethesda. Such a contribution to the character of the area does not merit its protection.

### RECOMMENDATIONS

I recommend:

**(REC.0212) that the DD be modified by deleting the site's designation as Protected Open Space;**

**(REC.0213) that no other modification be made to the DD in response to these objections.**

## BRYNREFAIL SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/65	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Brynrefail.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land that separates the 2 distinct built-up elements that form Brynrefail. A formal designation of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0214) that no modification be made to the DD in response to this objection.**

## CAEATHRO SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/77	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is need for a 'green barrier' between Caernarfon and Caeathro.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the land that separates the 2 distinct settlements of Caernarfon and Caeathro. A formal designation of this land is not required. The presence of a holiday park within a part of this intervening land, which lies outside the defined development boundary of either settlement, does not alter my findings in this respect.

### RECOMMENDATION

I recommend:

**(REC.0215) that no modification be made to the DD in response to this objection.**

## NEAR CAE'R GLYN GARDENS, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/3	Lord Newborough	Guy D Evans	273

### Main Issues

- Whether the land near Cae'r Glyn Gardens should be designated as Protected Open Space.
- Whether the site should be designated for housing use.

### Inspector's Considerations and Conclusions

*Whether the land near Cae'r Glyn Gardens should be designated as Protected Open Space*

1. The objector contends that the site's designation as Protected Open Space conflicts with the criteria for such designation as set out in Policy B11. Whilst I note that the site is in private ownership this is not a crucial consideration given that the Policy seeks to protect areas that contribute to the character and appearance of an area. Two of the Policy's criteria appear to be of greatest relevance in this case, the first and third: the site's contribution to the character of the town and its importance to the community. There is no dispute that the site no longer provides any public access and thus its value, according to the Council, is its positive contribution to the character and appearance of this part of Caernarfon.

2. The site is presently a relatively flat field, bounded primarily by hedgerows and trees. It lies within an extensive housing estate area with a large school, Ysgol Syr Hugh Owen, on the other side of the main road. Its visual contribution to its surroundings, although pleasant, is modest. It is situated in proximity to 3 other designated open spaces, including the expansive school playing fields. It seems to me that the site is an unremarkable area of undeveloped land, which in the context of nearby open spaces and the other areas of green spaces around buildings, is not worthy of being afforded the protection of Policy B11.

*Whether the site should be designated for housing use*

3. On the basis of the information before me, I concur with the Council's view that the site does not constitute previously developed land, as defined in PPW. Nevertheless, in terms of its location within the urban centre and its accessibility to a range of services by means other than the car the site performs well in relation to the principles of sustainable development. I am also mindful of the need to find suitable sites to meet future demand for housing.



4. Given my findings in relation to the first issue and that the layout, design and landscaping of any development on the site could be controlled, I am satisfied that a housing development could be accommodated on the site without any unacceptable impact on the character or appearance of the area. However, the matter of vehicular access is not straightforward. It is accepted that the only means of access is directly onto the main road fronting the site. The Council has expressed concern regarding such an access because of its juxtaposition with the school. In my opinion this raises sufficient doubt regarding its ability to be developed that it ought not to be allocated for housing. Clearly the site could be developed as a windfall site provided that this matter, and any other detailed concern that may arise, can be adequately addressed.

#### **RECOMMENDATION**

**I recommend:**

**(REC.0216) that the DD be modified by deleting the site's designation as Protected Open Space;**

**(REC.0217) that no other modification be made to the DD in response to this objection.**

## COED HELEN FIELDS, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/567/1	Caernarfon Civic Society		1

### Notes

- Objection B/567/1 and the Council's Proof of Evidence 1 deal with the merits of designating the former Oil Wharf shipping berth site as part of the Victoria Dock redevelopment area. This objection is dealt with in the section of my report dealing with the redevelopment site of Cofi Bay/Victoria Dock, Caernarfon.
- Objection 567/3 and 567/2004 relate to the Caernarfon Castle and Town Walls World Heritage Site. These are considered below together with the Council's rebuttals contained in their Proofs of Evidence numbers 2 and 3.

### Main Issue

- Whether the land at Coed Helen Fields should be identified as area forming the setting of the World Heritage Site.

### Inspector's Considerations and Conclusions

1. The Coed Helen Fields area is identified as forming part of the 'Essential Setting' of the World Heritage Site by the World Heritage Site Management Plan. The objector considers that this should be reflected in the Plan. Policy B6 requires that a development proposal is assessed against its impact on the World Heritage Site. Such an approach is consistent with other important designations such as AONBs, the National Park, listed buildings and conservation areas. It is not necessary to seek to define the areas that form the setting of such areas on maps. Not only would this lead to greater complexity in the maps but would be too simplistic.

2. It seems to me to be preferable to require a decision to be made as to whether a proposal affects the setting of the designated area on a case-by-case basis taking into account factors such as height, scale and context. I have also noted the other policies and designations that would afford protection to the site. Matters relating to a Master Plan for the area prepared on behalf of the Council do not fall within the remit of my consideration.

**RECOMMENDATION**

**I recommend:**

**(REC.0218) that no modification be made to the DD in response to this objection.**

## CARMEL SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/66	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Carmel.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tracts of open land that separates the 3 distinct built-up elements that form Carmel. A formal designation of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0219) that no modification be made to the DD in response to this objection.**

## CRICCIETH CONSERVATION AREA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA351

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1467/2001	RR Carey-Evans		175
B/1604/2003	Hugh Gwynne		186

### Note

- In its Proof of Evidence 186, the Council refers to objection B/1604/2004. On the basis of the summary of the objection therein, and the above reference number, I have treated the Proof as dealing with objection B/1604/2003.

### Main Issue

- Should the Plan amend the Criccieth Conservation Area.

### Inspector's Considerations and Conclusions

1. Objection is raised to NA 351, which is a Pre-inquiry Proposed Change that amends the Criccieth Conservation Area boundary. One objector contends that the designation should be more extensive, another considers the designation of the land adjacent to the Gorseddfa estate to be unwarranted. In introducing the proposed change the Council is seeking to update the Plan to reflect the fact that the Conservation Area boundary has been formally amended since the Deposit Draft version was prepared. The process of amending a conservation area is one which is separate to the UDP, thus the merits of the revised boundary is not a matter for me to consider. As NA 351 provides more up-to-date information it is a change that ought to be incorporated in the Plan.

### RECOMMENDATIONS

I recommend:

**(REC.0220) that the DD be modified by the acceptance of NA 351;**

**(REC.0221) that no other modification be made to the DD in response to these objections.**

## DINAS SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/67	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Dinas

### Inspector's Considerations and Conclusions

The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land that separates the distinct built-up elements that form Dinas. A formal designation of this land is not required.

### RECOMMENDATION

I recommend:

**(REC.0222) that no modification be made to the DD in response to this objection.**

## EDERN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/70	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Edern.

### Inspector's Considerations and Conclusions

The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land that separates the 2 distinct built-up elements that form Edern. Indeed part of this land lies within the Llyn AONB, the remainder is designated as a Landscape Conservation Area. Further protection of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0223) that no modification be made to the DD in response to this objection.**

## GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA280

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/44	CCW		623

### Main Issue

- Whether the SSSI in the Groeslon area should be shown in the Plan.

### Inspector's Considerations and Conclusions

1. In relation to the Groeslon area the objector points out that the SSSI, which extends beyond the boundaries of the Special Area of Conservation (SAC), is not shown on the Proposals Map. The Council accepts the error and offers NA 280 in response.

### RECOMMENDATIONS

I recommend:

**(REC.0224) that the DD be modified by the acceptance of NA 280;**

**(REC.0225) that no other modification be made to the DD in response to these objections.**



## LOCAL NATURE RESERVE - LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/760/45	CCW		632

### Main Issue

- Designation in the vicinity of Llanberis Country Park.

### Inspector's Considerations and Conclusions

1. It appears that the objector is concerned that the depiction of the SSSI in the vicinity of the Llanberis Country Park is incorrect, and is shown as a Local Nature Reserve. The Council explains that parts of the area are designated both as a SSSI and a Local Nature Reserve, but that in some areas the latter extends beyond the former. Where both designations apply, the annotation shows the most important in terms of nature conservation hierarchy. On the basis of this explanation there is no reason to modify the Plan.

### RECOMMENDATION

**I recommend:**

**(REC.0226) that no modification be made to the DD in response to this objection.**

## ALLOCATED LAND IN LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/76/28	Mike Webb (RSPB Cymru)		

## LLANENGAN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/71	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is need for a 'green barrier' between the built up parts of Llanengan.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tract of open land that separates the 2 distinct built-up elements that form Llanengan, which lies within the Llyn AONB and the Llanengan Conservation Area. A formal designation of this land as a green barrier is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0227) that no modification be made to the DD in response to this objection.**

## MYNYTHO SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/72	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Mynytho.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land, designated as a Landscape Conservation Area, which separates the 2 distinct built-up elements that form Mynytho. A formal designation of this land as a green barrier is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0228) that no modification be made to the DD in response to this objection.**

## NEAR RHANDIROEDD, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/21	Lord Newborough	Guy D Evans	568

### Note

- The aspects of this objection which relate to the potential of the site for housing development are dealt with in the section of this report which relates to the omission of housing land allocations in Llyn DCA.

### Main Issues

- Whether the land at the Nefyn allotments site should be designated as Protected Open Space.
- Whether the land at the Nefyn allotments site should be designated as Protected Play Area.

### Inspector's Considerations and Conclusions

*Whether the land at the Nefyn allotments site should be designated as Protected Open Space*

1. The objector contends that the site's designation as Protected Open Space conflicts with the criteria for such designation as set out in Policy B11. Whilst I note that the site lies in private ownership this is not a crucial consideration given that the Policy seeks to protect areas that contribute to the character and appearance of an area. The Council refers to the value of the site as being two-fold – it provides a valuable recreation area for local people and it affords an important view of nearby mountains. From my inspection of the site and the evidence presented by local residents it seems to me that the former attribute is its most significant contribution. Given the site's peripheral location to the village the prominence of the surrounding countryside is such that the visual impact of this site is not so significant as to warrant protection as Protected Open Space. Mindful of its recreational value I consider that the site ought to be assessed against the criteria for designating a Protected Play Area, which I examine below.

*Whether the land at the Nefyn allotments site should be designated as Protected Play Area*

2. Policy CH40 seeks to safeguard, amongst other facilities, open spaces of recreational value. The supporting text explains that this includes allotments. This aligns with PPW which informs that allotments should be retained. The objector

refers to the site as the "former allotments site", and has provided photographs of the site showing it in an overgrown state. In a statement dated March 2006 the objector's agent describes the current use as grazing and explains that it is private land which has no benefit to the local community in terms of amenity value. In contrast, photographs submitted on behalf of local residents dated 4 April 2006 show gardening activity on the site which is consistent with my findings following a visual inspection of the area in March 2007. I have also received a copy of a petition, described as containing 451 names, mostly residents of Nefyn and nearby settlements, which support the retention of the allotment facility. The Council explains that it understands that the site has been leased by the Nefyn Town Council since 1896 and used as allotment gardens. It is further explained that during a period of uncertainty over its future the site was under-used and that this may account for the state of the site as shown in the objector's photographs.

3. On the balance of the available evidence it seems to me that the site continues to be used as allotments and is a facility which is locally valued. Within development boundaries open spaces of recreational value are identified on Inset Maps as Protected Play Areas. I consider that the site should be designated as such. The objector suggests that it would be willing to consider the use of alternative land as allotments but this is not a matter for me, rather it would fall to be assessed in the context of a planning application.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0229) that the DD be modified by deleting the site's designation as Protected Open Space and replacing it with the designation of Protected Play Area;**

**(REC.0230) that no other modification be made to the DD in response to this objection.**

## NEFYN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/73	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Nefyn.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tract of open land that separates the 2 distinct built-up elements that form Nefyn. A formal designation of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0231) that no modification be made to the DD in response to this objection.**

## PENTREFELIN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/76	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Pentrefelin.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tract of open land that separates the 2 distinct built-up elements that form Pentrefelin. A formal designation of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0232) that no modification be made to the DD in response to this objection.**



## OPPOSITE INDUSTRIAL ESTATE, PENYGGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA303

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/42	CPRW		392

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2146	Environment Watch Wales & the Borders		392
B/551/2006	Llanllyfni Community Council		111

#### Note

- The above table relating to Pre-inquiry Proposed Changes contains an error – the response reference numbers should be swapped, such that 111 relates to Environment Watch Wales & the Borders and vice versa.

#### Main Issues

- Should the designated Protected Open Space area be redefined.

#### Inspector's Considerations and Conclusions

1. The Council explains that in order to prevent the coalescence of Penygroes and Llanllyfni the Plan identifies a large swathe of land between the 2 settlements, which runs north-eastwards from the A487, as Protected Open Space. In response to an objection the Council has sought, via NA 303, to omit a part of the originally designated area. The land in question lies to the east of the road connecting the 2 villages and extends from the football ground south-westwards to Afon Llyfni. There are two reasons given for this change, firstly the land includes the recently refurbished football ground which is considered to be part of the built-up element of Penygroes, and secondly, the remaining land under consideration might be required for the future expansion of the nearby industrial site.

2. On the basis that the primary reason for this designation is to provide a clear gap between settlements it is consistent with one of the 5 purposes of protecting

open spaces as set out in the supporting text to Policy B11. It seems to me that, given its current use and its physical connection with Penygroes, the exclusion of the football ground would not undermine this objective.

3. Turning to the remainder of the land in question, this includes prominent open land fronting a significant length of the undeveloped road frontage between the two settlements. The gap between the two villages has been eroded by a few groups of long established residential properties and more recent commercial buildings that are visible from the road that links them. Contrary to the Council's opinion, it seems to me that the development of this part of the land under consideration would seriously undermine the stated intention of protecting the open space between the two settlements.

4. The reason given for suggesting its exclusion from the protected area is that it might be required to facilitate the expansion of the nearby industrial estate. It would be expected that if there was such a demand that additional industrial land would have been allocated in the Plan. I have not been made aware of any evidence of a short term need for industrial land that would require the expanse of land that is affected by the proposed change. Indeed, in its Proof of Evidence 389, the Council argues that there is a sufficient supply of industrial land within the area (see the section of my report on Near Industrial Estate Penygroes). Should the situation change in the short term, alternative sites for industrial use could be reappraised as part of the preparation work for the Plan's review or replacement.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0233) that the DD be modified by the acceptance of NA 303 but only insofar as it relates to the identified football ground and associated land;**

**(REC.0234) that no other modification be made to the DD in response to these objections.**

## NEAR INDUSTRIAL ESTATE, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/661/1	Dafydd G Owen, Antur Nantlle		389

### Main Issue

- Should the designated Protected Open Space area be redefined.

### Inspector's Considerations and Conclusions

1. The Council explains that in order to prevent the coalescence of Penygroes and Llanllyfni the Plan identifies a large swathe of land between the 2 settlements, which runs north-eastwards from the A487, as Protected Open Space. The objector wishes to see an area of land to the south of the industrial estate, which lies between the A487 and the road connecting Penygroes and Llanllyfni, being excluded from designation as Protected Open Space. It is explained that anticipated industrial developments within the estate would mean that there would be little spare capacity. To address this potential shortfall, the objector contends, the site should be allocated as industrial land. In response the Council explains that there is sufficient industrial land within the Dependency Catchment Area to meet the projected need. It also points out that the site may have a nature conservation value although no detail has been provided.

2. I consider that the site in question performs a useful role in safeguarding the gap between the 2 settlements. If developed, the site in question would effectively link the villages, especially when viewed from the nearby trunk road. On the basis of the evidence available to me there is no justification for permitting the potentially serious erosion of this important area of open space.

### RECOMMENDATION

I recommend:

**(REC.0235) that no modification be made to the DD in response to this objection.**

## SITES AT PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/773/40	Chris Wynne (North Wales Wildlife Trust)		167

### Note

- Despite the title set out above, this objection relates to the proposed allocation of land at one site - Ty'n y Weirglodd (Near the Football Ground), Penygroes. It is dealt with in the section of the report dealing with that proposed housing allocation within the Caernarfon DCA.

## NEAR MAES GERDDI , PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/700/1	Church of Jesus Christ of Saints		631

### Note

- The name of the Objector in the table above is incomplete – it ought to read 'Church of Jesus Christ of Latter Day Saints'. I have also taken into account its objection B/700/3 within this section.

### Main Issue

- Whether the land near Maes Gerddi, Porthmadog should be designated as Protected Open Space.

### Inspector's Considerations and Conclusions

1. Objection is raised to the inclusion of the site within the area designated as Protected Open Space which lies between Porthmadog and Tremadog. The basis of the objection is that its designation would conflict with the objector's intention of erecting a chapel building on the site. Matters raised regarding the merits of such a proposal is not a matter for my consideration in the context of the UDP, rather they may be presented in support of a planning application. The objection does not raise any concerns regarding Policy B11 itself, only to its application to the site in question. There has been no evidence presented to suggest that the designation of the area between Porthmadog and Tremadog in general, or the site in particular, does not conform to the Policy.

2. It seems to me that the designation meets the Policy's criteria for selection, in particular that it would protect a clear gap between the 2 settlements. As the site is an important component of the area of open space that the Plan seeks to protect, there is no justification for excluding it from the designation. The Council has noted that a dwelling has been erected on a part of the site in question. I also note that a Protected Road Line runs through the designated area of open space. These considerations do not alter my findings that it is not necessary to change the Plan.

**RECOMMENDATION**

**I recommend:**

**(REC.0236) that no modification be made to the DD in response to this objection.**

## GLANDON, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/26	CPRW		630

### Main Issue

- Whether the site should be designated for environmental improvements.

### Inspector's Considerations and Conclusions

1. The objector explains that the site was designated by the Dwyfor Local Plan as an Environmental Improvement Scheme and wishes to see the designation continue. However, as the Council points out, there is no equivalent designation proposed in the UDP. No evidence has been presented to justify such a designation and I conclude that it is not necessary to modify the Plan in this respect.

### RECOMMENDATION

I recommend:

**(REC.0237) that no modification be made to the DD in response to this objection.**

## GLANDON AREA, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/935/7	Mr & Mrs A Davies		161

### Notes

- Although not listed above I have taken into account the Council's Proof of Evidence No 137.
- This section of the report should be read in conjunction with that dealing with Policy B10.

### Main Issue

- Whether the Landscape Conservation Area boundaries in the vicinity of Caernarfon Road, Pwllheli are appropriate.

### Inspector's Considerations and Conclusions

1. The objector considers the boundaries of the LCA near Glandon Garage, Caernarfon Road to be arbitrary and criticises the Plan for failing to justify the designation. It is evident that this LCA was designated on the basis of a LANDMAP assessment - a national standard used by the CCW and recognised by PPW as an important information resource. It seems that the precise boundary of the LCA in this area has been inaccurately superimposed on the base map in some respects. This has led to the failure of the LCA boundaries to coincide precisely with existing features such as means of enclosure. These discrepancies are relatively minor, nevertheless this can give the impression of arbitrariness. Public confidence and understanding of the Plan would be improved if the boundaries more closely followed on the ground features.

2. The explanatory text briefly, but adequately, outlines the basis of the methodology that has been used - a more detailed explanation would add unnecessary detail to the Plan. Other than for minor deviations mentioned above no substantive evidence has been submitted by the objector to demonstrate that the boundaries of the LCA have been inappropriately drawn around the vicinity of Glandon Garage, and thus there is no justification for redefining the boundary in response to the objector's evidence. The Council explains that the methodology of landscape assessment has created situations where some built up areas fall within LCAs. The extent of this near the site in question does not, in itself, undermine the validity of the Plan's approach.

3. The Council is in the process of reviewing the LCA designations and NA 336 has implications for that in the area adjacent to Glandon Garage. For the reasons I



give in the section of this report which relates to proposed housing land allocations in Llyn DCA I have recommended that this Pre-inquiry Proposed Change be accepted. This will necessitate a realignment of the LCA boundary in this area.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0238) that the DD be modified by redrawing the LCA boundary in the vicinity of Glandon Garage so that it reflects NA 336 and coincides more closely with physical features;**

**(REC.0239) that no other modification be made to the DD in response to these objections.**

## TRAETH MAWR, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/53	CCW		625

### Note

- Although not referred to in the box heading above the Council has proposed a Further Proposed Change: NAP 119 which is relevant to this site.

### Main Issue

- Whether the Glaslyn Marshes SSSI should be shown in the Plan.

### Inspector's Considerations and Conclusions

1. In relation to the Glaslyn Marshes near Porthmadog, the objector points out that the SSSI designation is not shown on the Inset or Proposals Maps. The Council accepts the error and offers NAP 119 in response. As this change appears to improve the accuracy of the Plan I conclude that it should be incorporated. However, it is a change that has not yet been the subject of public scrutiny. For this reason the Council will need to carefully consider any comments received to this change at the proposed modifications stage.

### RECOMMENDATIONS

I recommend:

**(REC.0240) that the DD be modified by the acceptance of NAP 119;**

**(REC.0241) that no other modification be made to the DD in response to these objections.**

## RACHUB

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/760/40	CCW		624
B/760/39	CCW		624

### Main Issue

- Whether the Plan should show the SSSI in the Bethesda/Rachub area.

### Inspector's Considerations and Conclusions

1. The objector points out that whilst the Plan shows the extent of the Special Area of Conservation (SAC) in the Bethesda/Rachub area it does not show the SSSI. The Council explains that in circumstances that 2 designations coincide it has adopted the practise of showing only the most important designation, in this case the internationally important SAC. In the interests of clarity, I agree that it is necessary to limit the amount of information contained within the Plan's maps. In this case, given that the Plan identifies the site as being internationally important in terms of nature conservation, I consider that the Council's approach has been acceptable.

### RECOMMENDATION

I recommend:

**(REC.0242) that no modification be made to the DD in response to this objection.**

## RHOSGADFAN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/68	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Rhosgadfan.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the tract of open land that separates the 2 distinct built-up elements that form Rhosgadfan. A formal designation of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0243) that no modification be made to the DD in response to this objection.**

## RHOSHIRWAUN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/74	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Rhoshirwaun.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land, designated as a Landscape Conservation Area, which separates the 2 distinct built-up elements that form Rhoshirwaun. Further protection of this land is not necessary.

### RECOMMENDATION

I recommend:

**(REC.0244) that no modification be made to the DD in response to this objection.**

## SARN MELLTEYRN SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/75	Environment Watch Wales & the Borders		114

### Main Issue

- Whether there is a need for a 'green barrier' between the built-up parts of Sarn Mellteyrn.

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. For reasons set out in its Proof of Evidence the Council explains that the Plan has in place policies that will protect land outside Development Boundaries, permitting development only in exceptional circumstances. I concur that the Plan provides adequate protection for the significant tract of open land that separates the 2 distinct built-up elements that form Sarn Mellteyrn. A formal designation of this land is not required. NA 338 proposes the extension of the Development Boundary such that it would link the 2 parts of the settlement along one side of the highway. This is dealt with in the section of my report which relates to the Land Near the Hall, Sarn Mellteyrn in the Llyn DCA, and does not alter my findings in relation to this issue.

### RECOMMENDATION

I recommend:

**(REC.0245) that no modification be made to the DD in response to this objection.**

## SSSI BOUNDARIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA390; NA377

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/43	CCW		135

### Note

- The above objection relates to the Bontnewydd Inset Map.

### Main Issue

- Whether the SSSI at Bontnewydd should be shown in the Plan,

### Inspector's Considerations and Conclusions

1. In relation to Bontnewydd the objector points out that whilst the Special Area of Conservation (SAC) is shown on the inset map, the extent of the SSSI is not identified. The Council explains that in circumstances that 2 land designations coincide it has adopted the practise of showing only the most important designation, in this case the internationally important SAC. However, as the extent of the SSSI is greater than the SAC, it accepts that it should have shown the SSSI insofar as it extends beyond the SAC. Indeed it appears that since the DD version the Council has re-examined the extent of SSSI coverage throughout the Plan area and has sought to correct their depiction by introducing NA 377 and 390. It is only the former Pre-inquiry Proposed Change that relates to this objection.

## RECOMMENDATIONS

I recommend:

**(REC.0246) that the DD be modified by the acceptance of NA 377;**

**(REC.0247) that no other modification be made to the DD in response to these objections.**

## TALYBONT SETTLEMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA259

### Conditionally Withdrawn Objection to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/63	Environment Watch Wales & the Borders		547

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name	Agent	Response Ref
B/756/2122	Environment Watch Wales & the Borders		547

### Note

- In its Proof of Evidence the Council suggests that objection B/756/63 sought the designation of land between Llandygai and Talybont as 'Green Belt'. In fact the objector refers to 'green barrier' rather than Green Belt. The Proof also states that NA 259 designates the site as "protected green space" – this is an error which ought to read "protected open space".

### Main Issue

- Whether there is a need for a Green Barrier/Protected Open Space between Llandygai and Talybont

### Inspector's Considerations and Conclusions

1. The term 'green barrier' as used by the objector is understood to be the equivalent of a 'green wedge' that is referred to in PPW. This is a local designation which, according to PPW, may be justified where it can be demonstrated that normal planning policies cannot provide the necessary protection. The Council accepts the objector's contention that there is a need to formally designate this site in order to reduce the possibility of the 2 settlements becoming joined. Rather than designation as a green barrier, the Council proposes, via NA 259, that the area be a 'Protected Open Space' which it considers would serve to maintain the openness of the land, safeguarding the individual identities of the settlements.

2. Both settlements are classed as Rural Villages. For reasons set out in the section of this report on Affordable Housing I recommend that this classification be omitted from the plan and that the clusters of buildings affected by this change should be classed as groups of buildings within the countryside. Accordingly, both



national and local planning policies would provide that any development within such areas would be strictly controlled. Given this context there seems to me to be no benefit in designating a strip of land that lies between these settlements as Protected Open Space or as a green barrier. Moreover, in relation to numerous other settlements which have been the subject of the same type of objection the Council has rejected the need for such a designation on the basis that policies within the Plan offered adequate protection. I have not been persuaded that each of those cases was so materially different to the one in question as to warrant its stance in this instance. Thus, even if one or both of the settlements were reclassified as Villages, this would not alter my findings in this respect.

## **RECOMMENDATION**

**I recommend:**

**(REC.0248) that no modification be made to the DD in response to this objection, and in particular that NA 259 be not accepted.**

**BRYN GOLAU, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA377

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/760/47</b>	<b>CCW</b>		<b>622</b>

**Main Issue**

- Whether the SSSI in the Waun Golau area should be shown on the Proposals Map.

**Inspector's Considerations and Conclusions**

1. In relation to the banks of the Gwyrfai river the objector points out that the SSSI, which extends beyond the boundaries of the Special Area of Conservation (SAC) is not shown on the Proposals Map. The Council has acknowledged the error and offers NA 377 in response.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0249) that the DD be modified by the acceptance of NA 377;**

**(REC.0250) that no other modification be made to the DD in response to this objection.**

## Y FENAI WOODLANDS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/41	CCW		621
B/760/36	CCW		621

### Note

- Objection B/760/41 is dealt with in the section of my report on Semi-natural woodland along the Menai Strait, Bangor.

### Main Issue

- Whether the Menai Woodland SSSI should be shown in the Plan.

### Inspector's Considerations and Conclusions

1. The Council explains that it has not received the latest information on the extent of the designated area, and is content that this can be addressed by updating the Plan's maps at a later date. There appears to be no sound reason to delay addressing this matter; any necessary updating of the Plan should be undertaken as part of the proposed modifications process.

### RECOMMENDATIONS

I recommend:

**(REC.0251) that the DD be modified by identifying the Menai Woodland SSSI on the Proposals Maps;**

**(REC.0252) that no other modification be made to the DD in response to these objections.**

## ADJOINING TY'R GOF, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA340

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/306/1	Terry & Rhian Mai Evans		565

### Main Issue

- Whether the land adjoining Ty'r Gof should be designated as a Protected Open Space.

### Inspector's Considerations and Conclusions

1. At present the site is an open area of land bounded by Ty'r Gof and, on the remaining three sides, by roads. It lies within an area of relatively low density development, where the garden areas of the nearby dwellings create a verdant appearance to this part of the village. On the opposite side of the road the Development Boundary of the village lies near to the site's western extremity, thus the presence of open countryside is a prominent component of the surroundings. The site's contribution to the character of the area is modest. The Council accepts that there is no justification for the designation and through NA 340 has proposed its deletion. I note the objectors' suggestion that the site would be suitable for a modest housing development, but this would be a matter for consideration at planning application stage as a windfall site.

### RECOMMENDATIONS

I recommend:

**(REC.0253) that the DD be modified by the acceptance of NA 340;**

**(REC.0254) that no other modification be made to the DD in response to this objection.**

## MAPPING OF DESIGNATED SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/24	CCW		645
B/844/50	CPRW		645

### Main Issues

- Identification of SSSI boundaries on Proposals Maps.
- Whether registered historic landscapes, parks and gardens should be shown on the Plan's maps.

### Inspector's Considerations and Conclusions

#### *Identification of SSSI boundaries on Proposals Maps*

1. In response to an objection, the Council accepts that the Plan's representation of SSSIs within the Plan area is not wholly up-to-date and that there have been errors in transposing the cartographical information from one scale to another. It explains that it is inevitable that situations will arise when the Plan's maps will become out-of-date as statutory designations change and that the Plan avoids using the wording "as shown on the proposals map". However, it intends to address the cartographic errors and assemble the most up-to-date data prior to the publication of the final version of the Plan. It seems to me that such information, as far as is reasonably possible, should be completed prior to the publication of the Proposed Modifications version, thus enabling interested parties to comment on the revised information.

#### *Whether registered historic landscapes, parks and gardens should be shown on the Plan's maps*

2. An objector argues that registered historic landscapes, parks and gardens should be identified on the Plan's maps in the same way as conservation areas are shown. In response the Council explains that, in the interests of avoiding over-loading maps with information, it has chosen not to show the former on the maps. Conservation areas, on the other hand, are identified because they are statutory designations. It explains that, to assist the reader, a list of the historic parks, gardens and landscapes is set out in Appendix 1 of the Plan, to which a cross-reference is made in paragraph 3.3.11 of the DD.

3. It is in the best interests of users of the Plan as a whole that an appropriate balance is struck between providing useful information and avoiding the document being over long and unduly complicated. In this case, given the significance attached by the Plan to these designated areas, I consider that historic parks,

gardens and landscapes ought to be shown on the proposals maps. To avoid over elaboration it may suffice that all such areas are identified under one common annotation. Users of the Plan would thus be alerted to the need to undertake further enquiries in appropriate circumstances. In including such designations the Plan would be consistent with the identification of other non-statutory designations such as ancient and semi-natural woodland on its maps and would enable readers of the plan to easily understand the historic sensitivity and significance of parts of the Plan area.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0255) that the DD be modified by amending the Proposals and Inset Maps as is necessary to correctly identify all the designated SSSI within the Plan area;**

**(REC.0256) that the DD be modified by amending the Proposals and Inset Maps as is necessary to identify all sites designated in the Register of Historic Landscapes, Parks and Gardens of Special Interest in Wales within the Plan area;**

**(REC.0257) that no other modification be made to the DD in response to these objections.**

**OBJECTIONS TO CHAPTER 'C'**

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

This Section is subject to Further Proposed Changes Nos: NAP3; NAP81; NAP82

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/70	Welsh Assembly Government		304
B/866/15	Snowdonia National Park Authority		303
B/76/45	Mike Webb (RSPB)		305
B/76/44	Mike Webb (RSPB)		554
B/756/35	Environment Watch Wales and the Borders		131
B/870/25	Sustainable Gwynedd Gynladwy		14
B/866/18	Snowdonia National Park Authority		304
B/866/16	Snowdonia National Park Authority		554
B/866/17	Snowdonia National Park Authority		554
B/767/4	Friends of the Earth (Mon & Gwynedd)		554
B/767/5	Friends of the Earth (Mon & Gwynedd)		554
B/767/6	Friends of the Earth (Mon & Gwynedd)		554

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/71	Welsh Assembly Government		
B/734/69	Welsh Assembly Government		



## Note

- I am mindful that the 3 Further Proposed Changes identified above have not been the subject of formal public consultation. Nevertheless, given that they seek to address objections and are of a relatively minor nature I have taken them into account in my assessment. It will be necessary to expose those changes that the Council wish to retain to public scrutiny as part of the proposed modifications process, when any comments that may be received should be carefully considered.

## Main Issues

- The implications of burning carbonaceous fossil fuels.
- Waste minimisation.
- Is paragraph 4.1.16 sufficiently supportive of renewable energy developments.
- Should the reference to 'government' be amended.
- Should the terminology used in respect of high quality agricultural land be revised.
- Should the Chapter's objectives include returning natural resources to the environment.
- Is the term 'balance' appropriate in the context of mineral working and the environment.
- Is the reference to 'Gwynedd' misleading.
- The respective roles of the County Council and the National Park Authority within the administrative area of the Snowdonia National Park.

## Inspector's Considerations and Conclusions

### *The implications of burning carbonaceous fossil fuels*

1. Paragraph 4.1.14 suggests that the burning of fossil fuels damages the ozone layer. The insertion of additional text "and contributes to harmful global climate change" which is proposed by NAP 3 does not alter the impression that fossil fuel burning leads to a depletion of the ozone layer. In the interests of clarity, and in line with objections, re-wording the paragraph is appropriate in order to refer to the link between the burning of fossil fuels and global climate change. In this context mention of the ozone layer should be omitted. The absence of a direct reference to CO<sub>2</sub> in the Plan is a matter raised by objectors but is not, in my view, an omission that has to be addressed - the Plan contains policies that seek to address the problems caused by climate change, which are addressed elsewhere in this report, and include the promotion of renewable energy provision and more sustainable patterns and forms of development.

### *Waste minimisation*

2. The objector considers that, in relation to the terminology used in paragraph 4.1.11, the Plan should be altered to demonstrate that it encourages a culture shift to waste minimisation. I concur that this could be expressed more clearly. Whilst the paragraph includes a reference to sustainable waste management, the overall impression created is that waste *disposal* and waste *disposal* hierarchy are given

undue prominence. Whilst it is important to emphasise the need to choose the most sustainable means of waste disposal there also is a need to give greater prominence to reducing and managing waste in order to minimise disposal. Such a change would align with paragraph 4.4.7 of the Plan, as amended by NA 124. One objector considers the opening sentence of the paragraph to be too negative – I disagree given that the statement merely seeks to acknowledge the “difficult” challenge that must be faced in suitably disposing of waste.

*Is paragraph 4.1.16 sufficiently supportive of renewable energy developments*

3. As the Council rightly points out in its rebuttal, it is necessary to consider potentially harmful impacts of renewable energy schemes as well as acknowledging the need to meet national renewable energy targets. However, I agree with an objector that the tone of this particular paragraph is unnecessarily negative. An emphasis on the need to strike an appropriate balance between conflicting objectives would appear to be a more suitable approach. In considering this paragraph I assume that the Council would address the error within the opening lines which appears to be caused either by missing text or the failure to strike out redundant text.

*Should the reference to ‘government’ be amended*

4. In the context of paragraph 4.1.5 I consider that reference to the “Welsh Assembly Government” would be more succinct than the “government and the National Assembly”.

*Should the terminology used in respect of high quality agricultural land be revised*

5. Paragraph 4.1.18 refers to highest quality agricultural land as the “best and most productive lands”. PPW uses the term “best and most versatile lands”. To avoid any unnecessary confusion that might arise from the inconsistency of terminology, I endorse NAP 81 which proposes to modify the expression in line with that used in PPW.

*Should the Chapter’s objectives include returning natural resources to the environment*

6. Insofar as is relevant to land use planning, the 5 objectives set out in 4.1.20 deal adequately with the scope of the Plan to achieve the prudent use of natural resources.

*Is the term ‘balance’ appropriate in the context of mineral working and the environment*

7. An objector considers that the term “balance”, as set out in the Chapter’s objectives, implies a “winner takes all” approach to mineral working and environmental damage, which runs contrary to the aim of sustainable development. I disagree. It is inevitable that mineral working proposals will give rise to conflicting objectives, such as the need for the material versus the protection of the environment. However, as part of the need to balance conflicting objectives, the decision maker is required to consider whether there are means of mitigating harm.

*Is the reference to 'Gwynedd' misleading*

8. Paragraph 4.1.18 of the Deposit Draft version refers to "Gwynedd". Given that parts of the County are not covered by the Plan, the revised description of "the Plan area" which is proposed by NAP 81 is a more appropriate term.

*Should the plan clarify the respective roles of the County Council and the National Park Authority within the administrative area of the Snowdonia National Park*

9. I concur with the Council that the administrative arrangements for the planning, collection and disposal of waste within the National Park area is not a matter that the Plan needs to address, given that it is an area outside the Plan area.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0258) that the DD be modified by deleting "government and the National Assembly" in paragraph 4.1.5 and replacement with "Welsh Assembly Government";**

**(REC.0259) that the DD be modified by amending paragraph 4.1.11 to give greater prominence to waste minimisation as a preferred method of waste management;**

**(REC.0260) that the DD be modified by amending paragraph 4.1.14 so that the link between the burning of fossil fuels and global climate change is more accurately expressed, and that the reference to the ozone layer is omitted;**

**(REC.0261) that the DD be modified by amending paragraph 4.1.16 so that it acknowledges the need to strike a reasonable balance in cases where securing renewable energy projects conflicts with other interests of acknowledged importance;**

**(REC.0262) that the DD be modified by the acceptance of NAP 81;**

**(REC.0263) that no other modification be made to the DD in response to these objections and, in particular, that NAP 3 be not accepted.**

## REDUCING THE LONG TERM EFFECTS OF DEVELOPMENT ON THE ENVIRONMENT - INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA101

### Supporters of Pre-Inquiry Proposed Change

Ref. No	Name	Agent	Response Ref.
B/773/2047	Chris Wynne (North Wales Wildlife Trust)		

### Notes

- This section deals with the introduction to sub-section 4.2 of the Plan.
- As Representation B/734/85 raises objection to the omission of a reference to Policy C12 within "the table", I have dealt with it below.

### Main Issue

- Whether the table identifies all the key policy considerations.

### Inspector's Considerations and Conclusions

1. NA 101 amends the table in introductory paragraph 4.2.1 by identifying key policy considerations in relation to policies C3, C6 and C7 and by expanding the list of such considerations for C4. I agree that C3 ought to be included within the table and that the additions to C4 provide a more comprehensive list of key policy considerations. With regard to C6 and C7, as these appear in sub-section 4.3 of the Plan, Minerals, reference to these policies should appear in the table in paragraph 4.3.4. For reasons that arise from my consideration of Policies C6 and C7 I conclude that it would also be appropriate to add C11 to the key considerations that relate to these policies. In the interests of clarity of expression I set aside NA 101 given the inadequacy of elements of that intermediate text.

### RECOMMENDATIONS

I recommend:

**(REC.0264) that the DD be modified by incorporating the changes proposed by NA 101 only insofar as they relate to Policies C3 and C4;**

**(REC.0265) that the DD be modified by inserting the reference in NA 101 to Policies C6 and C7 into the table in paragraph 4.3.4, and to add C11 to C12 as key policy considerations;**

**(REC.0266) that no other modification be made to the DD in response to these objections.**

## POLICY C1 – LOCATING NEW DEVELOPMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA102

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/959/6	Mr K Salisbury	CDN Planning	169
B/985/7	Welsh Highland Railway	Graham Farr	169
B/726/7	Tom Brooks		169
B/923/7	Tesco Stores Ltd	Paul Lester	169

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/72	Welsh Assembly Government		169

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/10	CPRW		169

### Supporters of Pre-Inquiry Proposed Change

Ref. No	Name	Agent	Response Ref.
B/756/2090	Environment Watch Wales & the Borders		169

### Notes

- Since preparing the skeleton report the Council has confirmed that Objection B/985/7 has been unconditionally withdrawn.
- I have treated the reference to Objection B/844/12, in the Council's Proof of Evidence 169, to have been an error which ought to read B/844/10.

### Main Issues

- Should affordable housing be an exception to the normally restrictive approach to development in the countryside
- The requirement that development in the countryside is "essential"

- Is the reference to "strictly controlled" appropriate
- Is the approach to development in the countryside too restrictive

### **Inspector's Considerations and Conclusions**

*Should affordable housing be an exception to the normally restrictive approach to development in the countryside*

1. The development of rural exceptions sites as a means of contributing to the stock of affordable housing in rural areas is supported by the latest expression of national planning policy as set out in MIPPS 01/2006 and TAN2. Thus, in principle, the Plan's strategy of allowing the release of land around the edge of settlements is an appropriate approach which can serve to meet some of the identified shortage of affordable housing in rural parts of the Plan area as well as helping to ensure the viability of the local community. The detailed approach to such development is addressed under Policy CH6 of the Plan and my findings are set out in the corresponding section of this Report.

2. An objector argues that affordable housing is not a type of development that "requires" a countryside location. However, it seems to be implicit that for a development to be classed as a rural exception scheme it must of necessity be within the countryside, in an area where housing would not normally be allowed. The term '*truly*' requires which is introduced by a Pre-inquiry Proposed Change is a matter which I address in relation to the second issue below.

*The requirement that development in the countryside is "essential"*

3. The term 'essential' appears in the DD version although no definition of what is meant by the term is provided. In any event I agree with the objector that such a stringent test is not a reasonable requirement given that it would impose a higher test than that set out in national advice. The Council has proposed NA 102 which omits this term but which also introduces the qualifying term "*truly*" in relation to "requires". I consider this addition not only to be superfluous but could give the mistaken impression that in policies where a 'requirement' is not qualified by '*truly*' this demotes its relative importance.

*Is the reference to "strictly controlled" appropriate*

4. The opening paragraph of the Policy informs that new buildings, structures and ancillary facilities in the countryside will be "refused" unless they constitute a specified exception. The final sentence of the same Policy provides that such development in the countryside which is not well related to existing development will be "strictly controlled". An objector opposes the reference to strictly controlled, preferring "refused". A blanket prohibition to all forms of development in the countryside would be contrary to national policy; PPW recognises that, for instance, in order to facilitate diversification of the rural economy there may be circumstances where development in the countryside may be appropriate.

5. In broad terms C1 strikes a reasonable balance between protecting the countryside from inessential development whilst allowing proposals for which there is particular justification. I acknowledge that the reference to 'refusal' at the beginning of the Policy and 'strictly controlling' later appears to be contradictory and the Council has not provided any illumination on this matter in its Proof of

Evidence. It seems to me that what may be intended is that 'strict control' is to be applied to those forms of development that constitute exceptions to the general approach of refusing development in the countryside and which are not well related to existing development.

6. Whilst PPW refers to the need to exercise strict control over development in the countryside there seems to be no reason to suggest that such control should only be exercised in cases where the proposal is not well related to existing development. This sentence should be amended so that it makes clear that in the case of development proposals that fall within the "exceptions" category that they will be strictly controlled and should, wherever possible, be spatially well related to existing development.

*Is the approach to development in the countryside too restrictive*

7. The preference for the use of previously developed land is dealt with by Policy C3. As an objector notes, without a reference to previously developed land as a potentially acceptable development in the countryside, there is an apparent contradiction between C1, as currently drafted, and C3. This could be avoided by amending C1 so that exceptions not only include identified developments that require a countryside location but also proposals that are permitted by other Plan policies. Such an amendment would overcome the difficulty that arises at present in the Policy which includes developments, which it could be argued, do not "require" a countryside location but may nevertheless be acceptable in such locations in circumstances set out in other Plan policies.

8. I appreciate that the exceptional developments identified in the Policy are examples and that the list does not purport to be exhaustive, and that the Plan is intended to be read as a whole rather than focussing on policies in isolation. Nevertheless, in the interests of clarity it is desirable to identify all the main types of development that constitute exceptions to the general restriction imposed by the Policy on development in the countryside. To this end it would be appropriate to add the demolition and reconstruction of dwellings, which is dealt with in Policy CH11.

9. The alteration or extension of buildings that lie within the countryside is not specifically addressed in the Plan. It would be helpful for the Plan to cover this topic, either in the form of a specific policy or by supplementing Policy C1 to confirm that the general policy on alterations and extensions, set out in B23, applies equally within the countryside as within settlements.

10. As an objector rightly points out, national policy explains that infill housing development may be acceptable but much will depend upon the particular circumstances. For historic reasons, notably the nature of traditional agricultural and industrial activity, much of the plan area has a dispersed pattern of development which means that the potential opportunities for infill development are high. Whilst the individual impact of many of these infill opportunities may be acceptable the cumulative effect on the character of the area that would result from the perpetuation of such a pattern of development would not perform well against the principles of sustainability. Thus, I consider the Plan's approach of excluding infill development from the types of development that can constitute an exception to the generally restrictive approach to development in the countryside is soundly based.

## RECOMMENDATIONS

I recommend:

**(REC.0267) that the DD be modified by inserting after “exception of development that” in the opening paragraph of the Policy “is permitted by another policy of the Plan or requires” and deleting “are essential and require”;**

**(REC.0268) that the DD be modified by amending the final sentence of the policy so that the extent to which development will be strictly controlled is broadened and clarified, and to require development to be, wherever possible, spatially well related to existing development;**

**(REC.0269) that the DD be modified by adding development on previously developed land, the demolition and reconstruction of dwellings and the alteration and extension of dwellings to the example list of developments identified in the Policy;**

**(REC.0270) that the DD be modified to address the alteration and extension of buildings in the countryside either by amending Policy C1 or by inserting a new one;**

**(REC.0271) that no other modification be made to the DD in response to these objections and, in particular, that NA 102 be not accepted.**



## POLICY C2 – ADOPTING THE SEQUENTIAL APPROACH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA103

This Section is subject to Further Proposed Changes Nos: NAP105

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/8	Tesco Stores Ltd	Paul Lester	228

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/73	Welsh Assembly Government		228

### Supporters of Deposit Draft

Ref No	Name	Agent	Response Ref
B/76/46	Mike Webb (RSPB)		228

### Note

- For reasons I set out in my consideration of Policy D26 I consider that the Council should insert within the supporting text of this Policy an explanation that the location of retail developments is a matter dealt with in more detail within Section 6.4 of the Plan.

### Main Issues

- Should the Policy apply the test of need for the development in relation to proposals outside town centres.
- Should the sequential approach take into account vacant previously developed sites.

### Inspector's Considerations and Conclusions

*Should the Policy apply the test of need for the development in relation to proposals outside town centres*

1. The introduction of qualitative and quantitative tests as an addition to criteria c., which is proposed by NA 103 (but in which 'quantitative' is misspelt) is generally consistent with the advice contained in MIPPS 02/2005 in relation to retail and leisure developments. However, in order that the type of development

that the Policy seeks to address is clear, and to align with national policy, it ought to refer to "proposals that need to be accessible to a large number of people" rather than "proposals that serve a large catchment area".

*Should the sequential approach take into account "vacant previously developed sites"*

2. The Policy seeks to ensure that development is sited in accordance with the sequential approach, which is based on the principle of locating as close to the centre of a settlement as possible. The desirability of developing previously developed land ahead of greenfield sites is an important aim enshrined in national planning policy. However, it is a distinct consideration to the sequential test and is separately addressed in the immediately succeeding policy of the Plan, C3. The omission proposed by NA 103 of the term "vacant, previously developed" from criteria c. is thus an appropriate alteration.

3. NAP 105 merely corrects a typographical error that appears in the Welsh version of NA 103.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0272) that the DD be modified by the acceptance of NA 103 as amended by NAP 105 and as further amended by the deletion from the opening line of the Policy of "Proposals that serve a large catchment area" and replacement with "Proposals that need to be accessible to a large number of people" and the deletion of "quantative" and replacement with "quantitative";**

**(REC.0273) that the DD be modified by the insertion, within the supporting text of this policy, of an explanation that the location of retail development is a matter dealt with in more detail within section 6.4 of the plan;**

**(REC.0274) that no other modification be made to the DD in response to these objections.**

## POLICY C3 – RE-USING PREVIOUSLY DEVELOPED SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA104

This Section is subject to Further Proposed Changes Nos: NAP106; NAP107

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/995/3	The Co-operative Group	Nathaniel Lichfield & Partners	234

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/11	CPRW		164

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/867/16	House Builders Federation		

### Supporters of Deposit Draft

Ref No	Name	Agent	Response Ref
B/773/28	Chris Wynne (North Wales Wildlife Trust)		234
B/1005/4	British Telecommunications Ltd	Mandip Dhillon	234
B/959/7	Mr K Salisbury	CDN Planning	234
B/923/9	Tesco Stores Ltd	Paul Lester	234

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/1649/2004	M Brymer		164

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name	Agent	Response Ref
B/756/2091	Environment Watch Wales & the Borders		234

### Notes

- During an inquiry session one objector agreed with the Council to discuss this Policy with a view of presenting further amendments to it. As no such document has been presented I have considered the Policy in the light of all the written and oral evidence that has been made available to the Inquiry.
- In addition to the above representations I have also taken into account objection B/790/8.
- In addition to the Pre-inquiry Proposed Change identified above, NA 144 is also relevant given that it provides a definition of previously developed land.

### Main Issues

- Does the Policy place undue emphasis on utilising previously developed land.
- Should the Policy exclude restored land from the definition of previously developed land.
- Whether the Policy should acknowledge the potential archaeological value of such sites.
- Clarity of expression.

### Inspector's Considerations and Conclusions

#### *Does the Policy place undue emphasis on utilising previously developed land*

1. Some previously developed land is identified in the Plan as being potential redevelopment sites. Nevertheless, given that these sites are not intended to represent every brownfield site within the Plan area that may come forward during the Plan period it is necessary that the Plan has a generic policy dealing with such land. The desirability of utilising previously developed land in preference to greenfield sites is consistent with national policy (section 2.7 of PPW). However, PPW also recognises that not all previously developed land is suitable for development. The Policy as amended by NA 104 includes a proviso that there is conformity with the Plan's objectives and development strategy. Thus, whilst the decision maker would be required to take into account the status of the site as previously developed land this would need to be weighed against the full range of planning considerations, including the sequential approach which is addressed in the preceding policy, C2.

2. The introduction under NA 104 of the term "near" instead of "on the edge of development boundaries" provides greater flexibility for the decision maker to balance the positive attribute of a particular site in terms of being previously developed land, against the fact that it may be physically separated from its nearest settlement. In such an instance the decision maker would also be required to take into account Policy C1 which seeks to direct most development to within settlements. However, it seems to me that the term "centres" is ambiguous in the

context of the Plan – it could be interpreted as meaning a town centre or one of 3 classifications of settlements ie sub-regional, urban or local centre. Replacing “centres and villages” with “development boundaries” would overcome this problem.

*Should the Policy exclude restored land from the definition of previously developed land*

3. Pre-inquiry Proposed Change NA 104 introduces a cross-reference in the explanatory text to a definition of previously developed land which appears in the Plan's glossary (under NA 144, as further amended by NAP 107). The definition is a facsimile of that which is provided in Figure 2.1 of PPW and among the exclusions from the definition is land where the remains of any structure or activity have blended into the landscape.

*Whether the Policy should acknowledge the potential archaeological value of such sites*

4. An objector considers that the potential archaeological value of previously developed land should be recognised in the Plan. The Council suggests that a cross-reference could be introduced to Policy B7 which deals with this matter. I agree that such a cross-reference would be helpful in highlighting a potentially important consideration in the development of certain sites.

*Clarity of expression*

5. NA 104 introduces several changes to the opening paragraph of the Policy. This is contained within one long sentence which is split into a number of clauses. As a consequence its meaning becomes less clear. I suggest that it is rewritten, and that in particular its punctuation is amended.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0275) that the DD be modified by the acceptance of NA 104 as amended by NAP 106 and as further amended by:**

- **the deletion of the term “centre” in the second line of the Policy and replacement with a more a more precise description;**
- **improving the grammatical punctuation of the Policy to aid clarity of expression;**

**(REC.0276) that the DD be modified by including in the supporting text a reference to the potential archaeological importance of some previously developed sites and to provide a cross-reference to Policy B7;**

**(REC.0277) that no other modification be made to the DD in response to these objections.**

## POLICY C4 – ADAPTING BUILDINGS FOR RE-USE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA105

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/12	CPRW		235
B/872/4	Nia Wynne Thomas		91
B/575/3	Cyngor Cymuned Aberdaron		235
B/1005/5	British Telecommunications Ltd	Mandip Dhillon	235

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/74	Welsh Assembly Government		235

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/844/2075	CPRW		235

### Note

- During a hearing session held on 5 May 2006 objection B/872/4 was unconditionally withdrawn.

### Main Issues

- The need for this Policy, bearing in mind other policies dealing with specific re-uses of buildings.
- Substantial rebuilding works.
- Whether the policy is too restrictive.
- Conversion schemes in the countryside for affordable housing.
- Whether the requirement that the re-use of a building in the countryside does not lead to the erection of a new building is appropriate.
- The requirement to keep traditional features.
- Access considerations.

## **Inspector's Considerations and Conclusions**

*The need for this Policy, bearing in mind other policies dealing with specific re-uses of buildings*

1. An objector points out that the conversion of buildings to specific uses is addressed under specific topics elsewhere in the Plan. However, this Policy forms part of a group of policies that deal with the location of development, the sequential test, previously developed land, sustainable building as well as adapting buildings. It seems to me that this Policy forms a component of this useful set of guiding principles for a wide range of development proposals, and should be retained.

*Substantial rebuilding works*

2. The supporting text to the Policy explains that there are a considerable number of derelict buildings in some parts of the plan area. In order to protect the character of the countryside and the role of the settlements the Council seeks to carefully control the extent of re-use of existing rural buildings. Such an approach is a reasonable local interpretation of national policy, particularly paragraphs 7.6.9 to 7.6.11 of PPW. The supporting text adds helpful illumination on the criteria that would be used to determine whether the physical condition of a building is such that it is capable of being converted, without major or complete reconstruction. Based on the available evidence and my knowledge of the area, there is no basis for seeking to allow the conversion of ruinous buildings for fear that the extent of such structures in some parts of the plan area would create a negative impression of the locality. Indeed over time the remains of such structures assimilate into their surroundings, often contributing to the character of the area, reflecting past patterns of development.

*Whether the Policy is too restrictive*

3. An objector contends that the Plan should adopt a more positive approach to the conversion of buildings, even those that are derelict, suggesting that it can contribute to avoiding urban sprawl. The objector also opposes this Policy as it seeks to prevent the scattered pattern of development which characterises the County. This approach runs counter to national policy that seeks to carefully control development in the countryside, not least to protect its character and appearance as well as ensuring more sustainable patterns of development to meet the global challenges of the twenty-first century. Historic patterns of development in the Plan area were mainly the result of the demands of the farming and quarrying industries. Changes in the nature and scale of both industries mean that there is no longer a requirement for the historic dispersal of buildings. Allowing the 'conversion' of ruinous structures would have the effect of allowing a disproportionate growth of development in rural areas for which there is no justification. I conclude that the Policy's restrictive stance is appropriate.

*Conversion schemes in the countryside for affordable housing*

4. The approach of carefully controlling the potential extent of conversions of buildings in the countryside is based on sound countryside protection principles. As PPW confirms buildings that are unsuitable for conversion without extensive

alteration, rebuilding or extension will be subject to similar control to that over new house building in the open countryside. There is no justification for relaxing this approach in the case of any type of residential use, including affordable housing. In the case of residential conversions in the countryside, this is dealt with by Policy CH10. Concessions for affordable housing appear elsewhere in the Plan.

*Whether the requirement that the re-use of a building in the countryside does not lead to the erection of a new building is reasonable*

5. In line with the specific advice in paragraph 12 of TAN6 which explains that it should not normally be necessary to consider whether a building is needed for its present purpose, NA 105 proposes to omit criterion 1, which sought to ensure that a scheme to adapt a building did not lead to the erection of a replacement building.

*The requirement to keep traditional features*

6. The Policy recognises the positive contribution that retaining existing buildings can make to its locality. One potential contribution is the maintenance of local identity. Achieving high quality design, as promoted by TAN12, includes the sensitive adaptation of traditional buildings to serve modern communities. Within this context the requirement in criterion 4 to retain any historic or architectural features of merit is a laudable and proper consideration. The importance attached to this aim will vary according to the significance of the building and particularly where buildings are subject to special protection. No modification is required in this respect.

*Access considerations*

7. As the Policy seeks to address the principle of building conversion, and given that access considerations are dealt with under Policy CH28 and would need to be applied across a whole range of proposals, it is not appropriate or necessary to specifically address access considerations under this policy.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0278) that the DD be modified by the acceptance of NA 105;**

**(REC.0279) that no other modification be made to the DD in response to these objections.**



## POLICY C5 – BUILDING IN A SUSTAINABLE MANNER

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA106

This Section is subject to Further Proposed Changes Nos: NAP95

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/867/17	House Builders Federation		236
B/870/26	Sustainable Gwynedd Gynaliadwy		236

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/75	Welsh Assembly Government		236
B/734/76	Welsh Assembly Government		236

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/1034/11	Wales National Trust	Chris Lambart	236

### Note

- In addition to the representations listed above I have also taken into account the comments contained in B/844/55 in my assessment of this Policy.

### Main Issues

- The emphasis on building in a sustainable manner.
- Does the Policy place proper emphasis on energy-saving schemes.
- Should the Policy require waste reduction measures.
- The energy reduction benefit of using local materials.

## Inspector's Considerations and Conclusions

### *The emphasis on building in a sustainable manner*

1. In its DD form the Policy requires only that "consideration" is given to building in a sustainable manner. NAP 95, which incorporates minor changes of expression to NA 106 and which would effectively supersede that Pre-inquiry Proposed Change, replaces "consideration" with a phrase that proposals will "have to favour" the requirements that follow unless it is not practical to do. Whilst giving "consideration" is an inadequate term which is capable of being complied with without resulting in any changes to a scheme, it seems to me that, in terms of what is expected of development, the suggested change lacks the clarity. An amendment to the wording to require all proposals to comply with the Policy's criteria unless it can be demonstrated that it is impractical to do so would aid the readers understanding of what is expected. In my view this would adequately address the concern expressed by an objector regarding the potentially prohibitive cost implications of some renewable energy technologies in certain cases. Paragraph 4.4 of TAN8: Planning for Renewable Energy establishes the value of the EcoHomes and BREEAM schemes as a framework for energy efficiency considerations. Indeed measurement against this standard is identified as a performance indicator in the monitoring section of Chapter C. It seems to me that reference to these standards as a means of assessing whether a scheme meets the aim of the Policy should be incorporated within it.

2. Subject to these suggested changes, the latest form of the Policy as set out in NAP 95 clearly explains its objective and the broad criteria against which schemes would be judged, and is consistent with TAN8 and TAN12. The Policy's criteria are set out in broad terms, rightly avoiding being too prescriptive. The degree to which a particular scheme will be considered to be acceptable when measured against these criteria will inevitably require judgement on a case-by-case basis. In order to assist developers in understanding the Council's expectations in this respect additional information is set out in development briefs and in the Gwynedd Design Guides 2001. To better support this Policy it is suggested that more up-to-date, detailed guidance on the topic in the form of new supplementary planning guidance would be useful. Furthermore, any particular site specific considerations could be addressed within new development briefs.

### *Does the Policy place proper emphasis on energy-saving schemes*

3. NAP 95 amends the Policy so that it requires an Energy Design Advice Report to accompany all planning applications, other than ones in outline, for non-residential buildings over 1000 sq m. The explanatory text is also amended to elaborate on the content of such a report and the action to be taken with regard to it. This approach reflects the advice set out in paragraph 4.5 of the latest version of TAN8, which was produced after the Policy was first written. Bearing in mind the extent to which planning policy can directly affect energy conservation the Policy, in its amended form, contributes to promoting energy saving in line with national planning policy. However, as the latest change to the policy has not been subject to public consultation any objections that are received to it at proposed modifications stage would need to be carefully considered.

*Should the Policy require waste reduction measures*

4. Criterion 6 requires the incorporation of waste recycling, sorting, storing and collection facilities but waste reduction measures (such as home composting) is not included. The Council has not provided an explanation for this, and I agree with an objector who considers that this ought to be added to the criterion.

*The energy reduction benefit of using local materials*

5. An objector contends that the phrase "opting for local materials can save energy by reducing the need to travel" should be re-phrased to "opting for local materials can save the energy that is used to transport them". As I agree with the Council's view that the original version is sufficiently clear, I conclude that there is no need to alter the Plan in this respect.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0280) that the DD be modified by the acceptance of NAP 95 as further amended by the following**

- **the deletion of "will have to favour the following unless they can satisfy the Local Planning Authority that it is not practical to do so" and replacement with "must comply with the following criteria unless it can be demonstrated that it is impractical to do so";**
- **the addition of "waste reduction measures (such as home composting)" be added to the list in criterion 6;**

**(REC.0281) that the DD be modified by the addition within Policy C5 of references to EcoHomes and BREEAM schemes as means by which the energy efficiency credentials of proposed development will be assessed;**

**(REC.0282) that no other modification be made to the DD in response to these objections.**

## **POLICY C6 – MINERAL DEVELOPMENT IN THE LLYN AREA OF OUTSTANDING NATURAL BEAUTY (LLYN AONB)**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA107; NA108

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/78</b>	<b>Welsh Assembly Government</b>		<b>231</b>
<b>B/734/77</b>	<b>Welsh Assembly Government</b>		<b>232</b>
<b>B/776/8</b>	<b>Environment Agency Wales</b>		<b>232</b>

### **Note**

- All of the above representations have been conditionally withdrawn, and I have dealt with their comments on this basis.

### **Main Issues**

- The future of sites after mineral extraction.
- Land drainage and water resources.
- The clarity of supporting paragraph 4.3.5.

### **Inspector's Considerations and Conclusions**

#### *The future of sites after mineral extraction*

1. National advice, including in MPPW, emphasises the importance of after use, restoration and aftercare in assessing mineral working schemes. The introduction of an additional criterion by NA 107 provides a form of wording used in criterion 9 of Policy C7 which addresses the objector's concern and I agree that it should be incorporated into the Plan.

#### *Land drainage and water resources*

2. In line with criterion 6 set out in Policy C7, NA 107 proposes to add another criterion to this Policy to overcome the objector's concern. It appears that the reference in NA 107 to this criterion as number "5" is in error and should read "6" given that it follows the 5 criteria set out in the DD version.

#### *The clarity of supporting paragraph 4.3.5*

3. In response to an objection the amendments to paragraph 4.3.5 that are proposed by NA 108 improve the clarity of the paragraph and I concur that they should be included within the Plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0283) that the DD be modified by the acceptance of NA 107;**

**(REC.0284) that the DD be modified by the acceptance of NA 108;**

**(REC.0285) that no other modification be made to the DD in response to these objections.**

**POLICY C7 – MINERAL DEVELOPMENT OUTSIDE THE LLYN AREA OF OUTSTANDING NATURAL BEAUTY**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA109

This Section is subject to Further Proposed Changes Nos: NAP103

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1225/4</b>	<b>Network Rail Infrastructure Ltd</b>		<b>556</b>
<b>B/734/79</b>	<b>Welsh Assembly Government</b>		<b>556</b>
<b>B/734/80</b>	<b>Welsh Assembly Government</b>		<b>556</b>

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/790/18</b>	<b>Gwynedd Archaeological Trust</b>		<b>556</b>

**Note**

- The Council's Proof of Evidence 556 purports to address representation B/734/80 but it does not. Nevertheless it is evident that the changes proposed under NA 109 and NAP 103 are in response to the objection raised therein.

**Main Issues**

- Whether the Policy ought to be revised to better relate to Policy C11.
- The desirability of transporting minerals by rail.
- Protecting the historic environment.
- Whether criterion 8 should be amended to avoid becoming outdated.

**Inspector's Considerations and Conclusions**

*Whether the Policy ought to be revised to better relate to Policy C11*

1. Policy C11 deals exclusively with proposals for the winning and working of slate, whereas the DD of Policy C7 refers to mineral working required to maintain a "landbank of aggregates and to meet the demand for slate products". The reference to slate in C7 is proposed to be deleted by NA 109 but this would leave confusion over whether slate for use as aggregate would be subject to the Policy.

Furthermore, NAP 61 proposes to amend C11 such that schemes falling within its remit would also need to meet the criteria set out in C7. It seems to me that the interrelationship between these policies could be simplified by retaining the reference to slate working within C7 and introducing as an additional tenth criterion a requirement that proposals for slate working must also meet the requirements of C11. It follows that I conclude that the proposed deletion, via NA 109 of "and the demand to meet slate products" should not be incorporated. Thus, I intend to set NA 109 to one side.

*The desirability of transporting minerals by rail*

2. In the context of mineral transportation paragraph 42 of MPPW sets out the Government's preference that freight is carried by rail or waterway rather than by road wherever this is economically feasible. It notes that investment in rail facilities can provide a valuable resource in rural areas, which could be shared by others. This objective ought to be included as an additional criterion to the Policy. Although Policy CH22 is generally supportive of improvements to the rail network this specific objective is not currently set out within the Plan.

*Protecting the historic environment*

3. An objector emphasises the need to protect the historic value of certain mineral workings and considers that this should be reflected in this Policy. In response the Council points out that the introduction to the minerals section of the Plan explains that it is necessary to read the Plan as a whole to gain an understanding of all the policies that may be relevant in any particular case. The protection of archaeological remains and historic landscapes is addressed in Chapter B and will be relevant regardless of the type of development proposed. In the interests of conciseness, I concur with the Council that it is not appropriate to duplicate the comments made therein within this Policy.

*Whether criterion 8 should be amended to avoid becoming outdated*

4. NA 109 proposes to insert "or any amendments" after referring to MTAN (Wales) and NAP 103 deletes the reference to the specific paragraph number. Such changes maintain a sufficient level of detail whilst avoiding the potential difficulties that could arise in the event of the present version of government's guidance being revised. Although, for the reason set out in paragraph 1 above, I intend to set NA 109 to one side, I shall incorporate the quotation set out in the opening line of this paragraph within my recommended changes. Given the minor nature of the change proposed by NAP 103 I intend to incorporate it within my recommendation even though it has yet to be the subject of formal public consultation; it will be necessary to carefully consider any representations made in response to it at the proposed modifications stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0286) that the DD be modified by the acceptance of NAP 103;**

**(REC.0287) that the DD be modified by the insertion of "or any amendments" at the end of criterion 8;**

**(REC.0288) that the DD be modified by the insertion of an additional criterion requiring mineral products and waste to be transported by rail or water wherever economically feasible;**

**(REC.0289) that the DD be modified by the insertion of an additional criterion requiring schemes for the winning and working of slate to meet the requirements of Policy C11;**

**(REC.0290) that no other modification be made to the DD in response to these objections and, in particular, that NA 109 be not accepted.**



## POLICY C8 – CONTRIBUTION TO THE SUPPLY OF AGGREGATES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA110

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/81	Welsh Assembly Government		233

### Main Issue

- Should the Policy be revised to indicate the likely objection to proposals for hard rock extraction.

### Inspector's Considerations and Conclusions

1. Paragraph 4.3.10 of the DD indicates that there is a 38 year landbank of hard rock at active sites, NA 110 changes this to "approximately 35". On this basis it goes on to state that it is "considered unlikely" that there would be a need for further reserves to be made available before the end of the Plan period. MTAN(Wales), in paragraph 49, provides that where landbanks exceed 20 years further extensions to existing sites or new extraction sites should be permitted only in "rare and exceptional circumstances". Two examples where circumstances may justify such an approach are provided. Paragraph 4.3.10 of the Plan, even as amended by NA 110, is not as restrictive as that set out in the MTAN. There appears to be no justification for departing from national policy, thus the paragraph ought to be re-worded to better reflect the MTAN.

### RECOMMENDATIONS

I recommend:

**(REC.0291) that the DD be modified by the acceptance of NA 110 as further amended by setting out in paragraph 4.3.10 that further extraction of hard rock will only be permitted in rare and exceptional circumstances, and to quote the examples of such circumstances as set out in paragraph 49 of MTAN(Wales);**

**(REC.0292) that no other modification be made to the DD in response to these objections.**

## POLICY C9 – SAFEGUARDING MINERAL RESOURCES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA111

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/36	Environment Watch Wales and the Borders		132
B/934/1	A.V. Roberts	Guy D Evans	132

### Main Issues

- Should the Mineral Consultation Areas (MCAs) be identified on the Plan's Proposals Map.
- Should the area around Derwyn Fawr Farm, Bryncir be designated as a MCA.
- The need for an Environmental Impact Assessment.

### Inspector's Considerations and Conclusions

*Should the MCAs be identified on the Plan's Proposals Map*

1. In line with the advice in paragraph 13 of MPPW the Plan introduces the concept of MCAs but, contrary to national policy, it does not identify the areas to be safeguarded on proposals maps. The DD version of the Policy indicates that MCAs have been identified, but this false impression has been corrected by NA 111. The change also indicates that the MCAs are expected to be identified within 6 months of the date of Plan adoption and that they will be shown in Supplementary Mineral Planning Guidance. Unitary Development Plans Wales advises, in paragraph 2.15, that supplementary planning guidance should not be used to avoid subjecting to public scrutiny proposals that should be included in the plan. Moreover, the failure to include such a potential restraint on development opportunities within the Plan's proposals map would lead to possible confusion. Given the importance of identifying such sites and the benefit of including such information within the Plan's proposals map, further consideration ought to be given to its incorporation within the Plan, as part of the Proposed Modification stage, rather than the approach suggested by the Council.

*Should the area around Derwyn Fawr Farm, Bryncir be designated as a MCA*

2. On the basis of site investigations undertaken in the early 1990s it is evident that there are sand and gravel resources at Derwyn Fawr Farm, and I have noted the comments made by the objector regarding its suitability for extraction. However, as the Plan has not identified any MCAs yet, it is premature to consider whether this particular site, in isolation from all other potential sites, ought to be included within such a designation.

*The need for an Environmental Impact Assessment*

3. The circumstance in which an Environmental Impact Assessment is required is comprehensively set out in secondary legislation. In the interests of conciseness and precision it is not desirable for the Plan to attempt to identify all instances in which an EIA is required. Thus, no modification is necessary in this respect.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0293) that the DD be modified by identifying Mineral Consultation Areas on the Proposals Map;**

**(REC.0294) that no other modification be made to the DD in response to these objections, in particular that NA 111 be not accepted.**

## POLICY C10 – BUFFER ZONES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA112

This Section is subject to Further Proposed Changes Nos: NAP32; NAP33

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/953/5	RMC Northern	Jo Davies, RMC UK	163
B/734/83	Welsh Assembly Government		163
B/734/82	Welsh Assembly Government		163

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2092	Environment Watch Wales & the Borders		146

### Main Issues

- Does the supporting text adequately deal with the Policy's interim criteria.
- Should the Policy explain how the Buffer Zones are to be introduced.
- Does the supporting text align with the requirements of the Strategic Environmental Assessment.

### Inspector's Considerations and Conclusions

*Does the supporting text adequately deal with the Policy's interim criteria*

1. The Council, in its Proof of Evidence 163, accepts that deferring the identification of the buffer zones until after the Plan's adoption by the introduction of supplementary planning guidance, as is envisaged by NA 112, is not acceptable. Both MPPW and MTAN expect buffer zones to be identified within UDPs. For this reason, and that set out with regard to Policy C9 on Safeguarding Mineral Resources, I consider it necessary that the zones are identified in the Plan.

2. The Council has sought to identify the buffer zones on proposals maps and alter the wording of the Policy and supporting text through Further Proposed Change NAP 32 and 33 and Appendix 3. The Council's Proof of Evidence explains that stakeholders have been consulted on these zones, provides a synopsis of the

responses it has received and confirms that the Council is not minded to alter any of the designations.

3. Whilst I support the decision to identify the zones prior to the Plan's adoption, and I note the assurance given by the Council that it has drawn the boundaries in accordance with the guidance in MTAN1, I have not received adequate information to enable me to consider whether the precise boundaries are appropriate. These zones have potentially significant implications for stakeholders and some have expressed concerns regarding certain designations. In my view this is a matter to be considered at the proposed modifications stage when the results of a formal consultation exercise can be considered together with a detailed justification for the particular boundaries proposed. This will also enable the Council to give further consideration to the wording of NAP 32 – in its present form the opening lines refer to the intention to define buffer zones, which is contradicted later by the reference to “buffer zones identified on the proposals maps”.

4. Consideration should also be given to other aspects of the wording: the reference to “allocated” sites is confusing given no such allocation appears on the Plan's maps; what is meant by the insertion of the word “notional” in relation to the zones; and the statement that the MTAN will be a material consideration suggests that in other cases it would not. Furthermore, further consideration needs to be given to the creation or definition of buffer zones around any mineral working sites that may become operational during the Plan period. In this respect the comments contained in the supporting text, which is proposed to be entirely omitted by NAP 32, may need to be retained in part. Given the intimate relationship between this Policy and MCAs I am of the opinion that the failure to-date to subject the MCAs to public consultation has tainted the process insofar as the Policy is concerned.

*Should the Policy explain how the Buffer Zones are to be introduced*

5. Given my findings on the inappropriateness of designating the zones after the Plan's adoption, this issue need not be addressed.

*Does the supporting text contradict the Policy*

6. The Council accepts that the DD version of the Policy does not align fully with the supporting text. Given the need to further amend the Policy and supporting text, as set out in relation to the first main issue, the matter of consistency is one to which the Council can give consideration in its redrafting of this Policy at the proposed modifications stage.

*Does the supporting text align with the requirements of the Strategic Environmental Assessment*

7. It is clear that the Combined SA and SEA Report prepared by Baker Associates on behalf of the Council considered that the UDP's approach to matters relating to minerals was appropriate. Objection has been raised to the Council's original intention of relying on supplementary planning guidance as a means of designating buffer zones and that this would fall outside the scope of the SEA process. It seems to me that the latest approach of identifying the zones as part of the UDP process adequately addresses this problem.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0295) that the DD be modified by the identification of mineral working Buffer Zones and amending the Policy and supporting text to reflect the presence of such zones and to take on board the detailed comments contained in the first issue considered above;**

**(REC.0296) that no other modification be made to the DD in response to these objections.**

## POLICY C11 - SLATE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA113

This Section is subject to Further Proposed Changes Nos: NAP61

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/298/1	J F Lloyd Ltd (Wincilate Ltd)		120
B/962/1	J.W. Greaves & Sons Ltd	Peter Marston	120

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/684/1	Alfred McAlpine Slate Ltd		139

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/233/1	John Mendoza, Watkin Jones Ltd		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2093	Environment Watch Wales & the Borders		120
B/962/2003	JW Greaves & Ltd	Peter Marston	120

### Main Issues

- Whether a more positive approach to extending existing workings compared with establishing new sites is justified.
- Should the Policy promote movement by rail.

## Inspector's Considerations and Conclusions

*Whether a more positive approach to extending existing workings compared with establishing new sites is justified*

1. Operators of slate working operations within the Plan area argue that whilst there are, in theory, adequate reserves of roofing and dimension stone slate, in practice the situation could prove to be different. Fickle geological conditions combined with the difficulties of predicting with any certainty the suitability of deposits until such time as they are worked means that the presently active quarries may be unable to exploit these reserves. This is not disputed by the Council. The few surviving quarries make a valuable contribution to the local economy, provide employment and ensure a choice of supply in the variety of slate for which the County is renowned.

2. The DD version of the Policy prohibits new or extensions to existing slate working. NA 113 provides that schemes that can satisfy 2 criteria will be exceptions to the negative thrust of the Policy, they are that the proposal can be justified on geotechnical and economic grounds and that it will release dimension stone quality material. NAP 61 adds 2 further criteria and a requirement is introduced that any scheme meets the criteria contained in Policy C7.

3. The latest version of the Policy seems to provide for sufficient flexibility to allow, in appropriate circumstances, current operators the opportunity to exploit alternative deposits to those they expect to quarry should circumstances so require. In my view this demonstrates that existing and proposed workings can be adequately dealt with by a single policy. Nevertheless, this latest version has not been subject to public consultation. It seems that all who objected at the 2 stages of public consultation have had the opportunity to comment on this latest version but any person who may be opposed to the relaxation of the restrictive stance of the earlier version of the Plan have been denied the opportunity, thus far, to present their views. However, I am also mindful that the inclusion of the need to assess any scheme against the criteria of Policy C7, which contain important requirements, is one which would, in effect, have been applicable under the terms of the DD version of C7 as it included reference to the demand for slate products.

4. During the Public Inquiry the Council accepted that certain revisions to the Further Proposed Change version of the Policy were necessary. For instance, "and in exceptional circumstances" was capable of being misconstrued and could be omitted; criteria 2 and 3 could be amalgamated; and the reference to slate quarry in the final criterion should be qualified to confirm that it covered both extensions and new operations. Furthermore, it would be helpful to insert into the explanatory text a form of wording that would make it clear that the Policy does not intend to prevent existing quarries from seeking to modify the precise location of their activity in response to difficulties encountered in other areas, provided that the alternative is acceptable in terms of the standard considerations identified in the Plan. In such circumstances the text could explain that, in order to avoid increasing the landbank of slate reserves, operators would be expected to surrender extant planning permissions, by means of planning agreements or prohibition orders, in exchange for a new permission.

5. I consider that the Further Proposed Changes version as amended addresses deficiencies in earlier versions and forms the basis, subject to the additional



changes that I have mentioned, of a Policy that should be scrutinised by public consultation at proposed modifications stage. Although I consider that Policy C7 should include a reference to C11 it would assist the Plan's clarity if the cross-reference suggested by NAP 61 was incorporated into C11.

*Should the Policy promote movement by rail*

6. The benefits of transporting heavy, bulky material such as slate is addressed in my comments on Policy C7, in which I recommend that an additional criterion be inserted under that policy to favour transportation by either rail or waterway, where feasible, rather than by road. Given that I share the Council's view that schemes considered against C11 should also be assessed against C7, there is no need to make specific reference to this in relation to the Policy under consideration.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0297) that the DD be modified by the acceptance of NA 113 as amended by NAP 61 and as further modified by incorporating the changes described in paragraph 4 above;**

**(REC.0298) that no other modification be made to the DD in response to these objections.**

**POLICY C12 – RESTORATION AND AFTER CARE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA114

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/37	Environment Watch Wales & the Borders		141

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/30	Chris Wynne (North Wales Wildlife Trust)		141
B/734/86	Welsh Assembly Government		141
B/734/84	Welsh Assembly Government		141

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/9	Environment Agency Wales		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/734/85	Welsh Assembly Government		

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/773/2049	Chris Wynne (North Wales Wildlife Trust)		

## Notes

- Representation B/734/85 is incorrectly identified in the above table as an expression of support. In fact it is an objection which has been conditionally withdrawn and is dealt with in this report under the 'Reducing the Long Term Effects of Development on the Environment – Introduction'.

## Main Issues

- Progressive restoration, funding and planting.
- Assessment of soil resources.
- Natural re-colonisation of sites.
- Should the timescale for restoration be specified to ensure long-term effect.

## Inspector's Considerations and Conclusions

*Should there be reference to progressive restoration, funding and planting*

1. NA 114 introduces the concepts of progressive restoration and funding arrangements and these broadly reflect WAG's approach to restoration, aftercare and after-uses as set out in MPPW. However the wording of the Policy should reflect the fact that there may be circumstances where progressive restoration is not practical (as is acknowledged in MPPW and MTAN1). The specific reference to 'planting' in the Policy, sought by an objector, is not necessary as this could be expected to one of the main elements of most reclamation projects.

*Should there be reference to an assessment of soil resources*

2. The importance of soil resources to the success of reclamation projects is emphasised by MTAN1 and the introduction of criterion 5 by NA 114 will provide suitable prominence for this detail.

*Should there be reference to allowing some sites to re-colonise naturally*

3. Both MPPW and MTAN1 acknowledge the opportunities for improving biodiversity that can arise as a consequence of restoration and after care. In certain circumstances restoration by natural regeneration can be the most appropriate after-use of such sites, especially where there is a serious shortage of soil. This issue is suitably addressed by NA 114 which adds 'natural colonisation' to the Policy's criteria.

*Should the timescale for restoration be specified to ensure long-term effect*

4. Paragraph 114 of MTAN1 explains that an aftercare period of 5 years is likely to be adequate if the after-use is agriculture, but that a longer period may be necessary in certain circumstances. In the event that a period beyond 5 years is appropriate this should be sought through a planning agreement or obligation. Such a detailed matter is one that would need to be considered on a case-by-case basis and does not need to be addressed by the Plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0299) that the DD be modified by the acceptance of NA 114 as further modified by deleting “progressive” and inserting a new sentence after the first sentence of the Policy – “Restoration shall be progressive wherever it is practical to do so.”**

**(REC.0300) that no other modification be made to the DD in response to these objections.**

## POLICY C13

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA115

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/87	Welsh Assembly Government		212

#### Note

- The title of this Policy, which has been omitted from the above box heading, is 'Monitoring'.

#### Main Issue

- Whether the requirements of the Policy can be achieved.

#### Inspector's Considerations and Conclusions

1. Paragraph 95 of MTAN1 advises that WAG expects environmental audits to be submitted by quarry operators to the mineral planning authority. In its DD form the Policy indicates that mineral operators "will be expected" to carry out an annual environmental audit of their operations. NA 115 alters this to "will be encouraged". An objector points out that it is not clear how the DD's requirement could be implemented and suggests that it could be a requirement imposed via a condition on a new permission. In both forms the Policy expresses a desire which in itself is not capable of implementation and in this respect does not align with the advice set out in Unitary Development Plans Wales, 2001, which also informs that policies should not include descriptions of administrative arrangements.

2. As this Policy deals with an administrative matter only, and is tantamount to an aspiration which cannot be secured through the planning process, it should not be included as a development plan Policy. I conclude that it should be deleted in its entirety.

#### RECOMMENDATIONS

I recommend:

**(REC.0301) that the DD be modified by the deletion of Policy C13 and supporting text in their entirety;**

**(REC.0302) that no other modification be made to the DD in response to these objections and, in particular, that NA 115 be not accepted.**

## **POLICY C14 – REMOVAL OF MATERIAL FROM MINERAL WORKING DEPOSITS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

This Section is subject to Further Proposed Changes Nos: NAP 1

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/790/19</b>	<b>Gwynedd Archaeological Trust</b>		<b>142</b>
<b>B/756/38</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>142</b>
<b>B/733/3</b>	<b>Margaret Shakespeare</b>		<b>142</b>

### **Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/88</b>	<b>Welsh Assembly Government</b>		

### **Note**

- In addition to the representations listed above this section also deals with objection B/760/46 from the Countryside Council for Wales and the Council's rebuttal in its Proof of Evidence 635.

### **Main Issues**

- Defining what constitutes "unacceptable impact" and who will undertake such an assessment.
- Does the Policy pay due regard to local circumstances.
- The potential detrimental effects of such activities on the local economy.
- The findings of a traffic report for Dyffryn Nantlle.
- Landscape, natural environment and species.
- The historic environment.
- A commitment to review the Policy within a specified period.
- The need for a detailed strategy.

## Inspector's Considerations and Conclusions

### *Defining what constitutes "unacceptable impact" and who will undertake such an assessment*

1. The Policy uses the term unacceptable impact in relation to a number of criteria. Within the Plan it is not possible to define what constitutes an unacceptable impact, for instance, in relation to visual impact or the effect on local residents. Each case would have to be judged on its merits and a judgement made on the impact of a scheme against each of the Policy's criteria. Contrary to the views of an objector, it is not necessary to elaborate on the identity of the decision-maker or on how the decision is made, given that the process of determining planning applications is a matter with which the public are generally familiar.

### *Does the Policy pay due regard to local circumstances*

2. In identifying a range of criteria against which to assess proposals to remove material from mineral working deposits the Policy enables the decision-maker to make a decision based on the particular circumstances of the site. In this respect it would enable the local distinctiveness of individual sites to influence decisions, avoiding a blanket approach to such proposals. In relation to the historic environment and cultural heritage it would add clarity and certainty to the Plan if areas of particular value were identified. Given the preparation work that this would entail this could be a matter to be addressed at the review stage of the Plan. Local circumstances, such as the suitability of the road network, would be assessed as required by other policies. No change to the Plan is necessary.

### *The potential detrimental effects of such activities on the local economy*

3. There is no substantive evidence to support an objector's contention that the removal of material from mineral-working deposits would deter sustainable community developments. In the event that such benefits were anticipated in a specific case, this could be taken into account as a material consideration in the evaluation of a planning application and weighed against the acceptability of the scheme.

### *The findings of a traffic report for Dyffryn Nantlle*

4. The Council has resolved to take into account the recommendations of the Mott MacDonald Report in its assessment of development proposals. Indeed it is required to take into account all material considerations in determining any planning application. However, it is not necessary to make specific reference to the report within the Plan.

### *Landscape, natural environment and species*

5. The reference to "visual amenity" in the 2<sup>nd</sup> criterion would cover landscape impact. The introduction to the Minerals section of the Plan makes clear it should not be read in isolation; there are other policies that address landscape and nature conservation matters. Such policies would have to be taken into account, together with C14, in the determination of proposals to remove material from mineral working deposits. However, as noted by objectors old slate tips can have a

particular nature conservation value and it seems that this could be reflected in the Policy without unduly extending its length.

*The historic environment*

6. Although the historic environment is matter that is dealt with elsewhere in the Plan, notably Policy B7, its inclusion within criterion 4, as is proposed by NAP 1, would broaden the interests that comprise the important legacy of the Welsh Slate industry. As this Further Proposed Change adds clarity rather than representing a significant change to the Policy I consider it appropriate that I take it into account in my recommendations. I am mindful that this change will be subjected to public scrutiny at the proposed modifications stage and any representations received on this change at that time will need to be carefully considered. However, in order that the criterion shall have effect in instances that may arise where only one of the two interests of "historic environment" and "cultural heritage" are present to a significant degree, the replacement of the intervening word "and" with "or" would be appropriate.

*A commitment to review the Policy within a specified period*

7. The Council intends that the Plan will be subject to continuous monitoring and that it will be the subject of full review every 5 years. In the interest of conciseness it is not desirable to make specific reference to the review process in relation to this Policy.

*The need for a detailed strategy*

8. Given its local significance the Council agrees with an objector that a strategy to deal with this matter would be helpful and suggests that this should take the form of supplementary planning guidance. I concur that this would be the most suitable means of taking this matter forward, and that there is no need to amend the Plan. The preparation of such guidance may reveal a need to amend the Policy which could be undertaken as part of the review or replacement of the UDP.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0303) that the DD be modified by the acceptance of NAP 1 as amended by replacing "and" with "or";**

**(REC.0304) that the DD be modified by the addition of a further criterion that should seek to avoid significant harm to nature conservation interests;**

**(REC.0305) that no other modification be made to the DD in response to these objections.**



## POLICY C15 – RAILHEAD AND WHARFAGE FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/5	Network Rail Infrastructure Ltd		555

### Main Issue

- Should protection be offered only where there is a realistic prospect of the facilities becoming available

### Inspector's Considerations and Conclusions

1. The objector supports the policy's aim of protecting potential rail routes and links, but considers that such protection should only be exercised where there is a realistic prospect of the sites coming forward during the Plan period. In its response the Council explains that the railhead facility identified on the Proposals Map has been identified on the basis that it will come forward in the Plan period and that planning permission has been granted. This reference to a single facility is confusing given that the Inset Maps identify facilities in at least 2 locations (Porth Penrhyn, Bangor and at Blaenau Ffestiniog). Nevertheless, as the Policy seeks to protect only existing and potential railhead wharfage facilities that have been identified on the Proposals Map an opportunity has been provided for objections to be raised to any site that was considered to have no realistic prospect of coming forward. None has been received. The Policy's requirements and the supporting text are considered to be reasonable in this respect.

### RECOMMENDATION

I recommend:

**(REC.0306) that no modification be made to the DD in response to this objection.**

**POLICY C16 – RECYCLED AGGREGATES FACILITIES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA116

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/89</b>	<b>Welsh Assembly Government</b>		<b>213</b>

**Main Issue**

- Whether there should be more advice provided on suitable locations for aggregate recycling facilities.

**Inspector’s Considerations and Conclusions**

1. The Council attaches importance to exploiting the potential of using secondary aggregates as a means of reducing the need for primary aggregate resources, which aligns with the Government’s stance to such initiatives as set out in MTAN1. To further this aim I agree with the objector that some additional guidance on the types of location that would be likely to be suitable would be helpful. In response the Council points to Pre-inquiry Proposed Changes NA 116 and 201 as changes that address this concern. In my opinion they do not go far enough. NA 116 is a neutral statement, stating that “Appropriate sites within the present [sic] industrial sites could be suitable”. The term ‘could’ in particular provides little direction for potential developers.

2. A cross reference to Policies D2 and D4 would be helpful, but further changes would be necessary to the former as I outline in the relevant section of this report. Through NA 201 the Council has sought to amend D2 by broadening the type of uses permitted on industrial sites which includes specifically identifying waste management facilities and any other ‘sui generis’ uses that are similar to Class B2 or B8 uses. Given the general desirability of recycling aggregate and the nature of the activity it would seem sensible that this was also specifically mentioned as a suitable use within D2.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0307) that the DD be modified by including within the supporting text clear guidance on the types of location where aggregate recycling would be suitable, and introducing a cross-reference to Policy D2 and D4;**

**(REC.0308) that no other modification be made to the DD in response to these objections and, in particular, that NA 116 be not accepted.**

## POLICY C17 – REVIEW OF OLD MINERAL PLANNING PERMISSIONS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA117

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/39	Environment Watch Wales & the Borders		143

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/90	Welsh Assembly Government		214

### Main Issues

- Reference to the “approval” of mineral review site applications
- The legal context for reviewing old mineral planning permissions

### Inspector’s Considerations and Conclusions

#### *Reference to the “approval” of mineral review site applications*

1. Pre-inquiry Proposed Change NA 117 suggests a form of wording that more accurately reflects the regime governing the review of old mineral planning permissions by referring to the *determination* of such applications rather than their *approval*. I concur that this should be incorporated within the Plan.

#### *The legal context for reviewing old mineral planning permissions*

2. Based on the submissions of the parties it appears that the legal position regarding the review of some old mineral planning permissions is not clear, following intervention by the European Commission. In the circumstances it is suggested that the Council re-consider the comments made in the supporting text (4.3.27) to this Policy at the Proposed Modification stage, in the light of the most up-to-date legal position at that time. Furthermore, in the interests of clarity the explanatory text would benefit from the addition of a clause to the effect that, in line with the advice in MPPW, the review of mineral permissions should be subject to consideration by EIA where appropriate.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0309) that the DD be modified by the acceptance of NA 117;**

**(REC.0310) that the DD be modified by up-dating the supporting text in light of the latest legal position on review regime available at the time, if necessary;**

**(REC.0311) that the DD be modified by an addition to the supporting text setting out the circumstances when an Environmental Impact Assessment may be required;**

**(REC.0312) that no other modification be made to the DD in response to these objections.**

## POLICY C18 – DORMANT MINERAL SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/91	Welsh Assembly Government		215

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/1034/12	Wales National Trust		

### Main Issues

- Whether the sites should be shown on the Proposals Maps.
- Whether the supporting text should provide details relating to the sites.

### Inspector's Considerations and Conclusions

#### *Whether the sites should be shown on the Proposals Maps*

1. In response to an objection on the grounds that the Proposals Maps should identify dormant mineral sites the Council explains that, of the 11 dormant sites, 5 are the subject of Prohibition Orders preventing further working. The Council contends that, as the remaining sites do not need restoration work, it is not necessary for them to be identified on the Proposals Maps. In contrast MPPW informs that the development plan should identify inactive sites with planning permission for future working which are unlikely to be reactivated. It seems to me that there is no adequate reason for not doing so, not least as this would provide an opportunity for interested parties to comment on the whether they agree with the Council's position that a restoration scheme is not necessary. Moreover, it is not clear to me on what basis the Council reached a view that no restoration was required on any of its dormant mineral sites.

#### *Whether the supporting text should provide details relating to the sites*

2. The objector's suggestion, which is broadly in line with MPPW, is that the supporting text should provide details of dormant mineral sites such as their use, the extent of reserves and their impact on landbanks. The Council has not responded to this suggestion.

3. Although the Policy undertakes to review all dormant sites the Council's reference in its Proof of Evidence to the fact that it has determined that there is no

need for any restoration work on the remaining 6 sites (those sites that have not been the subject of prohibitions orders referred to in paragraph 1) suggests that these sites have by now been reviewed. If this is the case, the Policy is out-of-date and should be amended. If the review work continues to be outstanding it should be undertaken in advance of producing the proposed modifications.

4. In any event I consider that details of all the remaining dormant sites should be included in the supporting text along the lines set out in paragraphs 19 and 20 of MPPW. As MPPW points out, it is important that the future of such sites is determined to provide certainty for the local community and to secure restoration of old workings at the earliest opportunity. I am mindful that the Council considers that no restoration work is necessary but as I explain in paragraph 1 it is not clear to me whether this decision has been subjected to public scrutiny.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0313) that the DD be modified by the identification of dormant mineral sites on the Proposals Maps and the rewriting of the Policy and supporting text to address the matters raised in relation to the second issue.**

**(REC.0314) that no other modification be made to the DD in response to this objection.**

## POLICY C20 – LOCAL BUILDING STONE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA118

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1034/13	National Trust Wales		216

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/92	Welsh Assembly Government		

### Notes

- NA 118 introduces a new phrase to the Policy which has not been highlighted as a change to the DD, it appears after "within the area" and reads: ", or the construction of new building [sic] on sensitive sites".

### Main Issues

- The use of stone for walls as well as buildings.
- Should the 'need' for the stone include its use in new buildings as well as for the repair of existing structures.
- Should the Policy be limited to meeting a local need.

### Inspector's Considerations and Conclusions

*Is there need to broaden the policy to include a reference to the use of stone for walls as well as buildings*

1. The importance of stone walls to the local heritage of this area is not disputed and thus the inclusion of a reference to walls within the Policy is appropriate. This amendment would be more easily introduced by the insertion of "or walls" between "buildings" and "of architectural or historic importance", instead of the phrase "or walls of historic importance".

*Should the 'need' for the stone include its use in new buildings as well as for the repair of existing structures*

2. Situations may arise where the use of a particular stone is required for a new building project, for instance because of its juxtaposition with existing



structures. NA 118 broadens the scope of the circumstances that can justify re-opening a mineral operation to address this eventuality.

*Should the policy be limited to meeting a local need*

3. The explanatory text to the Policy recognises the contribution that local building stone can play in preserving local heritage. In its Deposit Draft form the Policy does not limit the use of stone to local projects whereas the Pre-inquiry Proposed Change (NA 118) introduces a requirement that the stone is used for "local" buildings or walls "within the area". NA 118 also includes projects for "the construction of new building on sensitive sites" but these are not limited to being local or within the area. Based on the information before me it is not clear why it is necessary to introduce a 'local' justification. The Policy requires that the operation is of small-scale, compatible with other policies and in the interests of building conservation. Furthermore, any planning permission would be limited to a maximum 12 month period and would be subject to a condition specifying the end-use of the product. It appears that these provisos will provide the necessary safeguards to avoid the abuse of the Policy and would allow for the sensitive repair of buildings of architectural or historic interest which, despite lying outside the County, have been constructed using stone from Gwynedd. Thus, on the basis of the evidence before me, the reference to "local" and "within the area" proposed by NA 118 is inappropriate.

4. If the Council considers that there is an overwhelming justification for limiting the use of the stone to local projects then it seems that referring to both buildings and walls as 'local' is appropriate, thus avoiding the potential for confusion created by including the terms 'local' and 'area'. An explanation of what is meant by local ought to be included in the explanatory text. In the interests of consistency the limitation imposed by the term 'local' should apply to new buildings as well as existing and the Policy should be amended accordingly.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0315) that the DD be modified by inserting "or walls" after "buildings" in the second line;**

**(REC.0316) that the DD be modified by inserting "or the construction of new buildings, walls or other structures on sites of architectural or historic importance" after "importance" in the third line;**

**(REC.0317) that no other modification be made to the DD in response to these objections and, in particular, that NA 118 be not accepted.**

#### 4.4 WASTE MANAGEMENT, SITES AND FACILITIES INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA119; NA120

This Section is subject to Further Proposed Changes Nos: NAP64

##### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/94	Welsh Assembly Government		540

##### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/97	Welsh Assembly Government		

##### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2203	Welsh Assembly Government		540

##### Notes

- Objection B/734/94 is dealt with in the section of the report on Policy C21.
- Within this section I have also addressed part of objection B/776/10 and the Council's response in its Proofs of Evidence 540 and 144.

##### Main Issues

- Should there be a reference to TAN21 and the Wales Waste targets, and the way Gwynedd intends to meet the targets.
- Should the text refer to the title of European Union Directive in full.

##### Inspector's Considerations and Conclusions

*Should there be a reference to TAN21 and the Wales Waste targets, and the way Gwynedd intends to meet the targets*

1. NA 119 introduces additional text to paragraph 4.4.1. This includes reference to European directives and, at national level, to TAN21: Waste and the

Wales Waste Strategy 'Wise About Waste'. There is also a brief reference to the need to meet the targets set by the national strategy and the way in which the Council intends to comply with the requirements through promoting the development of sustainable waste management systems. Further Proposed Change NAP 64 makes reference to the 4 key principles that underpin the North Wales Regional Waste Plan: sustainability, proximity, regional self sufficiency and the waste hierarchy. I consider that these changes add useful background information on the Council's waste strategy. As this change has not been subject of formal public consultation any comments received when it is subjected to public scrutiny as part of the proposed modifications process will need to be carefully considered.

*Should the text refer to the title of European Union Directive in full*

2. The Council explains that it is anxious to avoid the use of "jargon", hence it has sought to use "popular" terms when referring to various directives. The Council considers that amending the Plan in line with the objection, given the minor change involved, could be done at the proposed modifications or when the final version is published. It seems to me that in order to assist the Plan's readers to locate the relevant directive that its full title would be useful, together with the abbreviated title included within parentheses.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0318) that the DD be modified by the acceptance of NA 119 as further amended by the inclusion of the full titles of the European directives with their abbreviated title included in parentheses;**

**(REC.0319) that the DD be modified by the acceptance of NAP 64;**

**(REC.0320) that no other modification be made to the DD in response to these objections.**

**POLICY C21 – PROVISION OF WASTE MANAGEMENT AND RECYCLING FACILITIES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA121; NA122; NA123

This Section is subject to Further Proposed Changes Nos: NAP 31; NAP77

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/93	Welsh Assembly Government		196
B/734/98	Welsh Assembly Government		196
B/866/19	Snowdonia National Park Authority		196

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/10	Environment Agency Wales		144
B/776/11	Environment Agency Wales		224

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1362/2001	Mr S.M. Crocker		196
B/1368/2001	Dafydd Herbert Errington		196
B/1600/2001	Steve Eggleston & Judith Francis		196
B/1663/2001	Frances G Stanford-Parker		196
B/1665/2001	T. Jackson		196
B/1669/2001	Ramona Crocker		196
B/1670/2001	Mr DF Good & Mrs L Curd		196
B/1657/2001	John & Clare Curtis		196

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B/1642/2001	Mr Anderson & Miss Ansderson		196
B/1667/2002	A.LI. & S.E. Parry		196
B/1664/2001	Llifon Glyn Hughes		196
B/1575/2001	Cara Whomsley & Adrian Walker		196
B/1428/2001	Mr Steve Hindle		196
B/1420/2001	Father Demetrius		196
B/1432/2001	First Industrial	Samantha Ryan (Turley Associates)	196
B/1425/2001	Gregory Johnston-Keay		196
B/1441/2001	R.Powell & S.M. Lloyd		196
B/1437/2001	Susan Shannon		196
B/1436/2001	Anthony Hilton		196
B/1472/2003	William Richard Griffiths		196
B/1473/2001	Mr Paul Stevens		196
B/1380/2001	J. Jones		196
B/1480/2001	Mrs Margaret A. Perry		196
B/1393/2001	Louise Curd		196
B/1396/2001	Dr Barry Kiehn		196
B/1411/2001	Emyr Roberts		196
B/1394/2001	Mrs Mary Kiehn		196
B/1548/2001	Melfyn V Spragg		196
B/1579/2001	Megan Rees		196
B/844/2076	CPRW		196
B/790/2038	Gwynedd Archaeological Trust		196
B/1497/2001	Mr Roger A. Perry		196
B/1474/2001	Mrs Linda Stevens		196
B/1365/2001	John Gruffudd Williams		196
B/1355/2002	Sandra Hilton		196
B/1360/2001	Councillor Dilwyn Lloyd		196
B/1315/2003	John Little		196
B/1359/2002	Elfed Vaughan Roberts		196
B/228/2011	Y Felinheli Community Council		196

<b>B/1034/2021</b>	<b>National Trust Wales</b>	<b>Chris Lambart</b>	<b>196</b>
<b>B/790/2036</b>	<b>Gwynedd Archaeological Trust</b>		<b>224</b>
<b>B/790/2037</b>	<b>Gwynedd Archaeological Trust</b>		<b>224</b>

### Unconditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1379/2001</b>	<b>Morris Jones</b>		

### Notes

- In addition to the representations listed above I have also taken into account objections B/734/94 & 95, and the Council rebuttals contained in its Proof of Evidence 196 in my consideration of this Policy.
- Objection B/776/10 is in part dealt with in the section of my report on Introduction 4.4 as well as within this section.

### Main Issues

- Reducing the volume of waste disposed of by landfill.
- Up-date the information on landfill waste sites.
- Identifying suitable sites for waste management facilities.
- Is the identification of sites sufficiently precise in terms of their boundaries and the nature of suitable activities.
- Directing waste management facilities towards industrial sites.
- Timescale for the provision of facilities in the regional waste plan.
- Open-windrow composting.
- Provision for the management of hazardous waste
- Working arrangements between the Council and the Snowdonia National Park Authority

### Inspector's Considerations and Conclusions

#### *Reducing the volume of waste disposed of by landfill*

1. In relation to the identification of landfill/landraise sites objection is raised on the basis that the Plan should not seek to make provision for such facilities, in favour of techniques that feature higher up the waste hierarchy. However, the approach set out in the Plan follows from the direction set out in the Regional Waste Plan which identifies a continuing need for landfill/landraise capacity for the "foreseeable future" even allowing for initiatives to minimise the proportion of waste which is treated in this way.

#### *Up-date the information on landfill waste sites*

2. Since the preparation of the Deposit Draft and Pre-inquiry Proposed Changes versions of the Plan there have been significant changes in the situation relating to

one of the 2 major landfill sites within the County – the Cilgwyn landfill site has failed to secure a Pollution Prevention and Control permit from the Environment Agency. This has necessitated the identification of a new facility that had hitherto been considered to have been adequately met by existing provision, ie a waste landfill site.

3. Although there were serious doubts regarding the future of the Cilgwyn site by the time the Pre-inquiry Proposed Change version was produced the supporting text maintained that Gwynedd was fortunate in having 2 landfill sites. It acknowledged that a licence had been refused but referred to an appeal and continued to estimate its capacity as 22-24 years. The Further Proposed Changes version accepts the necessity to secure an alternative site. Given that this represents a fundamental change in the way waste will be disposed of within Gwynedd during the Plan period it is necessary that the Council publicises this significant change in circumstance at the proposed modifications stage.

*Identifying suitable sites for waste management facilities*

4. The Deposit Draft version of the Plan provides an estimate, by facility type, of the number of additional waste management facilities required in 2013 for the County. These figures are based primarily on the Regional Waste Plan, and have been produced in accordance with the Best Practicable Environmental Option method taking into account the principles of sustainability, proximity, regional self-sufficiency and the waste hierarchy. In response to objections to the Deposit Draft the Council has identified locations that are considered suitable, subject to compliance with other Plan policies, to site waste management facilities - the Pre-inquiry Proposed Changes version identifies 14 sites, this is amended to 13 by a Further Proposed Change. The identification of the sites has been made on the basis of a study by SLR Consulting on behalf of the Council which assessed 43 sites.

5. The approach of identifying sites provides greater direction to all stakeholders on the matter of waste management and thus aligns with TAN21. In principle, I concur with the Council's decision to amend the Deposit Draft version of the Plan by identifying specific locations that would be suitable either for new facilities or to expand existing ones.

*Is the identification of sites sufficiently precise in terms of their boundaries and the nature of suitable activities*

6. For reasons I set out above, it is appropriate that the Plan provides greater detail than is contained in the Deposit Draft version on the type and location of waste management facilities which will be required during the Plan period. However, it is evident from the responses received to some of the sites proposed at Pre-inquiry Proposed Changes stage that the level of information provided on a site-by-site basis was deficient. The decision not to identify site boundaries means that the precise location and the extent of a site are not known. Whilst I appreciate that identifying precise boundaries may be difficult in some cases, the present approach is unduly vague. One objector cites, as an example, the difficulty of commenting on a specific location rich in archaeological value because of the lack of precision in identifying the potential extent of the land under consideration. It seems to me that, provided that the Plan makes clear that the boundaries are to be treated as indicative rather than definitive, the appropriate

balance could be struck between providing the necessary degree of flexibility should detailed site investigations warrant a revised site boundary and the necessary degree of detail reasonably expected in the context of Part 2 of the UDP.

7. The problem was not helped by the means used to identify the sites on the Pre-inquiry Proposed Change version of the Plan. Site representation on the A4 maps used often contain little useful context, especially in some of the remoter areas. There is a failure to name the site, identify significant landmarks or quote the OS grid reference on the maps. It seems likely that some interested parties have been unaware of the Plan's proposals in this respect despite having consulted the document. I also share the concerns of some objectors that the failure to identify the envisaged waste facility for particular sites meant that objectors had difficulty in responding to the Plan.

8. Cumulatively these deficiencies are serious. It is acknowledged that the Council has attempted to address many of the short-comings that are identified in the preceding paragraph through the introduction of Further Proposed Changes. However, given that these significant changes have not been the subject of public consultation, I am unable to comment on their merit, other than insofar as I have already made clear, additional site-specific information was required to facilitate meaningful public consultation and to provide future direction to the waste industry. It will be for the proposed modifications process to elicit the informed views of interested parties.

9. It is also evident that the primary basis for identifying the sites was the SLR Consulting study commissioned by the Council. The first study was undertaken in 2005, after the preparation of the Deposit Draft version of the Plan. That study makes clear that further work is required to assess the availability and suitability of certain sites. A subsequent report prepared by the same consultants was produced in February 2006, shortly before the opening of the Public Inquiry into the Plan, which assessed specific matters in relation to 6 of the sites previously identified. The latest study acknowledges that there were on-going developments that would affect the assessment process, for instance it was decided that the views of the Environment Agency would be sought after the publication of the report. There has also been a significant development in relation to the landfill situation.

10. The Council has sought to progress work aimed at securing such a facility for the short term at Llwyn Isaf, Clynnog with the possibility of a longer term provision through this site to Cefn Graianog. During the Inquiry it was confirmed that the Council had resolved to use compulsory purchase powers to secure the short-term facility. There can be no doubt that the situation with regard to landfill provision has been the subject to several fundamental changes over the time that this Plan has evolved.

11. Given the importance of this matter, as a crucial element in the provision of a network of waste management facilities to serve the County, and possibly the region, it is suggested that there is a need to examine this issue once more in the light of the latest information and to undertake a comprehensive public consultation exercise on the findings. It may be that a short- to medium-term measure can be identified with greater certainty than was the case when the Further Proposed Changes were prepared. Work on a longer term solution may be a matter that may not need to be addressed in the Plan, but which can be fine-tuned in preparation for a review or replacement of the UDP.



*Directing waste management facilities towards industrial sites*

12. In a letter dated 28 May 2004 WAG emphasised the important role that industrial land can play in meeting the need for waste management sites; general industrial areas are described as the most suitable locations for many types of new waste facilities. The types of facilities are wide ranging, excluding only landfill and windrow composting. The Plan, in its revised form acknowledges the role of industrial land in this respect: NA 121 identifies specific industrial sites as suitable for such facilities and NA 201 includes a reference to the suitability of such facilities on industrial land. It seems to me that a cross-reference between Policies C21 and D2 would be useful. Furthermore, given that D2 allows such facilities that have "similar features to B2 or B8" and that paragraph 4.4.4 informs that certain facilities may not be suitable near Class B2 uses, it seems to me that a cross-reference between C21 and D4 (which deals with 'bad neighbour' industries) would be helpful.

13. In this context it should be borne in mind that the Regional Waste Plan suggests that a number of waste facilities are likely to be Class B2 uses. If the Council is minded to exclude certain waste management facilities from general industrial sites, guidance should be provided within the Plan on the types of activity which are not deemed suitable on such sites. This would provide the necessary degree of certainty for the waste industry to seek to provide such facilities.

*Timescale for the provision of facilities in the regional waste plan*

14. NA 122 has been introduced by the Council to address this issue – rather than stating that additional waste facilities "would be required by 2013" it has been changed to "would be required in 2013". The clarity of meaning would be improved by the insertion of "that" immediately before this phrase.

*Open-windrow composting*

15. The supporting text to the Policy refers to open-windrow composting, but only as an example of a waste management facility that would not be suitable on an industrial site. An objector suggests that reference to such composting in relation to agricultural diversification should be considered. This would align with advice set out in the WAG letter of May 2004. Bearing in mind that the Regional Waste Plan identifies a need within Gwynedd for open windrow composting plant for 2013 as 7,128 tonnes which has been quantified in Table 3 of the Plan as 1 unit, I consider that the Plan should be amended to provide guidance on this topic. As the factors governing the location of such a facility are distinct from most waste management facilities, and that it does not merit site identification in the Plan, it may be best that this issue is addressed within a new policy.

*Provision for the management of hazardous waste*

16. In response to an objection that Table 3 within Policy C21 does not refer to hazardous waste facilities the Council explains that this is based on the approach set out in the Regional Waste Plan. As this issue is dealt with by NA 125, NA 126 and NA 127 – which I address in the sections of this reporting dealing with Policies C22 and 23 respectively - I concur with the Council that this matter need not be covered under C21.

*Working arrangements between the Council and the Snowdonia National Park Authority*

17. There is a close inter-relationship between the County Council and the National Park Authority in terms of waste issues, but it is not appropriate to include a statement of intent or a description of administrative arrangements within the Plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0321) that the DD be modified by revising the approach to the provision of landfill/landraise options in the light of the latest available information, and that a short to medium-term facility is identified, and if possible a longer-term facility or range of potential facilities are identified;**

**(REC.0322) that the DD be modified by identifying sites deemed suitable as potential waste management facilities, other than for landfill purposes;**

**(REC.0323) that the DD be modified by identifying all potential waste management facility sites on the Proposals Map by means of indicative site boundaries and suitable annotation to aid identification of location by users of the Plan;**

**(REC.0324) that the DD be modified by the insertion of suitable cross-references between this Policy and appropriate policies dealing with industrial land;**

**(REC.0325) that the DD be modified by identifying and justifying which types of waste management facilities are deemed to be unsuitable to be sited near to B2 and B8 industrial land;**

**(REC.0326) that the DD be modified by deleting from paragraph 4.4.5 "will be required by 2013" and replacement with "that would be required in 2013";**

**(REC.0327) that the DD be modified by including a new policy to deal with open-windrow composting;**

**(REC.0328) that no other modification be made to the DD in response to these objections and, in particular, that NA 121, 122 and 123, and NAP 31 and 77 be not accepted.**

## POLICY C22 – WASTE MANAGEMENT FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA124; NA125; NA126

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/99	Welsh Assembly Government		226
B/734/100	Welsh Assembly Government		277

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1441/2004	R. Powell & S.M. Lloyd		226
B/1413/2001	DF Good		226

### Notes

- B/734/100 is concerned with Policy C23, and is dealt with in that section of my report.
- B/734/96 includes matters that relate to C22 and are considered below, together with the Council's Proof of Evidence 225.

### Main Issues

- Guidance on the provision for special or hazardous waste.
- Whether the need for an "overwhelming justification" for landfill/landraise is consistent with Policy C23.
- Greater emphasis on waste reduction.

### Inspector's Considerations and Conclusions

#### *Guidance on the provision for special or hazardous waste*

1. NA 125 introduces a new supporting paragraph to C22 which deals with hazardous waste. It explains that the quantity of special or hazardous waste created in Gwynedd does not justify a site to deal with it. The Council's view that the relatively low volume of hazardous waste arising from within the area makes the provision of local disposal impractical is consistent with the North Wales Regional Waste Plan. The Regional Plan proposes to review its approach to special

and hazardous waste, once this has been done a review of this Plan's approach to such waste will be necessary. Although this Pre-inquiry Proposed Change refers to special as well as hazardous waste at its outset, it dispenses with the reference to 'special' thereafter. This creates uncertainty regarding the position of the Plan in relation to special waste - this ought to be addressed at the proposed modifications stage.

2. Objections are raised on the grounds that the storage of hazardous wastes would have public health risks. There are other controls that would regulate the way in which such waste was stored before forward transportation to a suitable disposal site elsewhere which would safeguard public health. Any such activity that would require planning permission would be assessed, subject to the introduction of NA 127, against C23 which includes a requirement that the proposed development is compatible with existing nearby uses.

*Whether the need for an "overwhelming justification" for landfill/landraise is consistent with Policy C23*

3. The objector compares paragraph 4.4.9, under C22, with the following policy, C23 and implies that there is a contradiction in their approach to landfill/landraise. Whilst the former refers to the need for an "overwhelming justification" for such sites, this is in the context of areas subject to a national nature conservation designation. In C23, in the context of general criteria for any landfill or landraise site, the need is expressed as a "demonstrable local need". The Council has proposed a change to this wording (NAP 65) which is dealt with in the section of my report on Policy C23. In its Proof of Evidence 226 the Council appears to take the position that there is no inherent contradiction in these different terms and that it is not necessary to amend C22. I agree. However, included in its proposed change NA 126 is the replacement of "overwhelming justification" with "demonstrable local". It would seem that such a change would mean that the same test would be applied to landfill/landraise schemes regardless of whether they are within an area of national nature conservation importance. Furthermore, given that the Council proposes to replace the reference to "demonstrable local need" in Policy C23 the consistency that the change may have sought would not be achieved if this Further Proposed Change is pursued. There appears to me to be no sound reason for replacing the original wording of "overwhelming justification", thus it should remain.

*Greater emphasis on waste reduction*

4. In response to an objection on this issue the Council proposes 2 Pre-inquiry Proposed Changes to the Plan. Firstly, NA 143 introduces a New Policy on waste management facilities in new developments - I address this in the corresponding section of my report. Secondly it proposes NA 124 which seeks to amend paragraph 4.4.7 by inserting a reference to giving priority to the reduction of waste. This addition to the supporting text of C22 gives greater emphasis to waste minimisation, in line with regional, national and European requirements.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0329) that the DD be modified by the acceptance of NA 124;**

**(REC.0330) that the DD be modified by the acceptance of NA 125;**

**(REC.0331) that the DD be modified by the acceptance of NA 126 but NOT insofar as it proposes to strike out "overwhelming justification in terms of" and replace with "demonstrable local";**

**(REC.0332) that the DD be modified by clarifying the Plan's position in relation to special waste;**

**(REC.0333) that no other modification be made to the DD in response to these objections.**

## POLICY C23 – LANDFILL AND LANDRAISE SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA127; NA128; NA129; NA130

This Section is subject to Further Proposed Changes Nos: NAP64; NAP65; NAP66; NAP67

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/866/20	Snowdonia National Park Authority		227
B/756/40	Environment Watch Wales and the Borders		144
B/767/3	Friends of the Earth (Mon and Gwynedd)		227

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/102	Welsh Assembly Government		144
B/734/101	Welsh Assembly Government		229
B/776/12	Environment Agency Wales		144

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2215	Welsh Assembly Government		144

### Notes

- The above box heading includes a reference to NAP 64. As it amends introductory paragraph 4.4, I have dealt with it in that section of my report.
- In addition to the above listed representations I have also considered objection B/734/100 and the Council's response set out in its Proof of Evidence 277 within this section.

## Main Issues

- Whether the Policy should encompass hazardous waste.
- Whether the reference to the 'need' for the facility should be rephrased.
- The criterion dealing with site management.
- Nature conservation, water resources and drainage regimes.
- Flooding risk.
- Whether the Policy should presume against landraise schemes.
- Whether the Policy should presume against new landfill sites that would have an impact on the Snowdonia National Park.
- The future requirement for landfill.
- The waste hierarchy.
- Mode of expression.

## Inspector's Considerations and Conclusions

### *Whether the Policy should encompass hazardous waste*

1. NA 127 broadens the scope of the Policy by proposing to add "and hazardous waste collection/disposal" to the title and the opening line of the Policy; together with NA 125 it addresses a previous vacuum in the Plan with regard to hazardous waste. NAP 67 corrects a typographical error. These changes improve the Plan but, to avoid any potential confusion, it is suggested that the "and" that precedes "hazardous substances" in the policy is altered to "and/or", thereby avoiding the impression that the policy applies only to schemes proposing both landfill/landrise *and* hazardous waste. The North Wales Regional Waste Plan includes a commitment to review its approach to hazardous waste: once undertaken a review of this Plan's approach to hazardous waste will be necessary. In line with my findings in relation to NA 125 which is set out in the section of my report dealing with C22, it may be necessary to refer in C23 to 'special' as well as hazardous waste.

### *Whether the reference to the 'need' for the facility should be rephrased*

2. Further Proposed Change NAP 65 replaces the requirement in criterion 1 for a "demonstrable local need" with "a local, sub-regional or regional need". As this better reflects the principle of regional self-sufficiency as set out in the Regional Waste Strategy the change is commended, although any responses to this change at the proposed modifications stage will need to be carefully considered.

### *The criterion dealing with site management*

3. NA 128 introduces changes to criterion 5 to include "site control" and "aftercare management". These changes provide a more extensive list of matters that need to be managed during and after waste disposal operations. The wording could be further clarified by the insertion after "site control" of "during and after waste disposal". In this context I agree with an objector that it would be helpful to refer to the need to avoid the unnecessary duplication of controls between planning and site licensing in the supporting text, in line with the position set out in paragraph 1.2.4 of PPW.

*Nature conservation, water resources and drainage regimes*

4. The introduction under NA 129 of a ninth criterion to the Policy which seeks to protect nature conservation, water resources and drainage regimes draws attention to matters that are likely to be fundamental issues in the evaluation of many landfill/landraise proposals. This change adds clarity to the Policy.

*Flooding risk*

5. NAP 65 proposes a reference to the risk of flooding as an addition to the ninth criterion (as proposed by NA 129). As this is a potentially crucial factor in cases involving significant changes in ground levels specific mention of it is warranted.

*Should the Policy presume against landraise schemes*

6. In many circumstances a landraise scheme has the potential to be visually more intrusive than a landfill option, but national policy does not stipulate a blanket prohibition of landraise schemes. It would be necessary to assess individual schemes on their merits, against the criteria identified in the policy (including that the scale of development is appropriate to its immediate surroundings) and any other relevant policies of the Plan.

*Whether the Policy should presume against new landfill sites that would have an impact on the Snowdonia National Park*

7. As PPW points out in paragraph 5.3.7, the duty to have regard to National Park purposes in planning decisions applies to activities affecting those areas, whether the activities lie within or outside the designated area. The Council proposes to introduce a new policy through NA 99 which deals with the protection of the landscape character of the National Park. Thus, any application for a landfill site would need to satisfy this policy as well as C23, which includes among its criteria that there are "no other more suitable sites" available. In the interests of conciseness it is not desirable to specifically refer to the National Park in this policy, especially as there are several other designations that would also need to be mentioned, not least Areas of Outstanding Natural Beauty.

*The future requirement for landfill*

8. Paragraph 4.4.10 of the DD states that "there will always be a need for landfill/landraise sites". In line with the original objector's suggestion NA 130 alters this to being a need "in the foreseeable future". A further suggestion that this be revised to immediate or near future has been suggested but the PIC version is an accurate representation of the position, which aligns with the government's position as set out in TAN21; no further change is necessary. NAP 66 is based on the DD wording of the sentence – it is assumed that this is an oversight which will be addressed at the proposed modifications stage.

*The waste hierarchy*

9. The waste hierarchy underpins national waste management strategy, and is reflected in the Regional Waste Strategy. The insertion proposed by NAP 66 of a brief description of the hierarchy within the supporting paragraph 4.4.10 is an



appropriate addition as it identifies the position of waste disposal at the bottom of the hierarchy. However, given the importance of this consideration I consider that the first criterion of the Policy should be amended by insertion at its end of "which cannot be met through means that perform better in relation to the waste hierarchy".

*Mode of Expression*

10. The extent of changes proposed by the Council via NA 127 to 130 and NAP 64 to 67 is testimony to its acceptance of the need to significantly alter the DD. I agree with the need to amend the Policy and consider that the Pre-inquiry Proposed Changes as further amended by the Further Proposed Changes generally represent a significant step in the right direction. Nevertheless, for reasons I set out in my assessment of the preceding main issues, there are further changes that are necessary. In the interests of clarity, rather than seeking to adapt the inadequate intermediate text produced by the Council since the DD, I shall set the Pre-inquiry Proposed Change and Further Proposed Change versions of the Policy to one side and recommend changes to the DD version.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0334) that the DD be modified by inserting within the title a reference to "AND HAZARDOUS WASTE COLLECTION/DISPOSAL" immediately before "SITES";**

**(REC.0335) that the DD be modified by deleting "landfill or landraise" from the first line of the Policy and replacement with "landfill/landraise and/or waste collection/disposal";**

**(REC.0336) that the DD be modified by deleting "demonstrable local" from criterion 1 and replacing it with "a local, sub-regional or regional";**

**(REC.0337) that the DD be modified by the inserting at the end of criterion 1 - "which cannot be met through means that perform better in relation to the waste hierarchy";**

**(REC.0338) that the DD be modified by inserting "site control during and after waste disposal" after "adequate measures for" in criterion 5, and in the same criterion to delete "site" and replace with "aftercare";**

**(REC.0339) that the DD be modified by the addition of an additional criterion, - "9. the development will not have an adverse impact on nature conservation interests of acknowledged importance, nor on water resources or drainage regimes and that there is no risk of flooding.";**

**(REC.0340) that the DD be modified by deleting "always" from the first line of paragraph 4.4.10 and in the same line to insert "in the foreseeable future" after "sites";**

**(REC.0341) that the DD be modified by inserting the text set out in NAP 66 which begins with "The waste hierarchy ..." and ends with "... without**

recovering energy." into paragraph 4.4.10, immediately after "in the foreseeable future" (which is inserted by the preceding recommendation);

(REC.0342) that the DD be modified by inserting a reference in the supporting text to the effect that planning controls will not be used to duplicate matters that can properly be controlled by site licensing;

(REC.0343) that the DD be modified so as to clarify the position in relation to special waste, unless this is clarified by an additional change to be introduced elsewhere in the Plan, for instance Policy C22;

(REC.0344) that no other modification be made to the DD in response to these objections and, in particular, that NA 127, 128, 129 and 130, and NAP 64, 65,66 and 67 be not accepted.

**POLICY C24 – INERT WASTE DISPOSAL ON AGRICULTURAL LAND**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA131; NA132

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/104	Welsh Assembly Government		170
B/756/41	Environment Watch Wales and the Borders		145

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/14	Environment Agency Wales		170
B/734/103	Welsh Assembly Government		145

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/13	Environment Agency Wales		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2094	Environment Watch Wales & the Borders		145
B/756/2095	Environment Watch Wales & the Borders		170

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/844/2068	CPRW		
B/844/2067	CPRW		

### Main Issues

- The need for a policy to deal with waste disposal on agricultural land.
- Requirement that disposal results in an essential improvement to the land.
- The monitoring and recording of waste.
- Whether nature conservation should be identified as a criterion.
- Whether pollution should be identified as a criterion.
- Reference to an Environmental Impact Assessment.
- Registering waste disposal activities with the Environment Agency.
- Approval from the Welsh Assembly agricultural division.

### Inspector's Considerations and Conclusions

#### *The need for a policy to deal with waste disposal on agricultural land*

1. There are concerns that waste has been deposited on farmland for reasons that purport to be agricultural as a means to exploit a 'loophole' in the waste management regime. However, there will be circumstances where the use of inert waste can prove an economically feasible means of securing significant improvements to the quality of agricultural land, for instance in improving drainage or topography. Accordingly it is appropriate that the approach to such schemes differs from that which applies to landfill and landraise proposals (dealt with under Policy C23). Criteria 4 to 7 of C24 all reinforce the basis of the Policy, that there is an agricultural requirement for the activity, although criterion 6 - which refers to the land being capable of improvement - ought to be deleted as it is superfluous given the effect of criterion 7, that there is a long term improvement in land quality.

2. Pre-inquiry Proposed Changes NA 131 and 132 introduce a host of revisions to the Policy and supporting text some of which are dealt with in relation to the other issues that have been identified. One of the most significant changes is the requirement that proposals will be judged against the criteria set out in Policy C23, which would be in addition to those in C24. The criteria in C23 include demonstrating a waste disposal need for such a facility and deals with matters of after-care. Such matters would not arise in cases where the intention is to improve the quality of agricultural land. In its revised form the Policy becomes more complicated and confusing given the introduction of this cross-reference to C23. Most of these proposed changes ought to be omitted although there is need to revise the DD. Firstly, to avoid any confusion the title ought to be changed to "The use of inert waste to improve agricultural land". Criteria 3 and 8, which require a demonstrable need for a disposal site and that there are no more suitable alternatives available should be omitted as these deal with schemes that are driven by the intention of disposing of waste rather than improving the quality of farmland. In the supporting text the sentence referring to landfill tax payments is an observation which does not contribute to the Plan and should be deleted. The

reference in NA 132 to the fact that this type of activity is regarded as a waste disposal operation clarifies the fact that even where the purpose is agricultural this does not obscure the fact that the operation involves the disposal of waste.

*Requirement that disposal results in an essential improvement to the land*

3. NA 132 introduces a requirement, in the Policy's supporting text, that the waste disposal activity should bring with it an "essential" improvement. Such a requirement is excessive and contradicts the test set out in fifth criterion, which is that the land is in "need" of improvement. The term "necessary" would be a more reasonable expression in this context.

*The monitoring and recording of waste*

4. The monitoring and recording of the disposal of waste is normally undertaken under the waste management regime, which is a separate statutory process to the planning system. However, subject to certain limitations some forms of waste activity are exempt from waste management licensing, this can include the disposal of waste in association with the improvement of agricultural land. As government has decided that such activities may be undertaken without the detailed controls imposed by the licensing regime it is not appropriate to use the planning system as an alternative means of achieving the same degree of control. The expectation that developers would provide the waste planning authority with access to its records of the disposed inert waste, as proposed in NA 132, should be omitted.

*Whether nature conservation should be identified as a criterion*

5. There will be circumstances where land which is difficult to farm, especially with modern machinery, will be left vacant for a considerable period of time. This absence of agricultural activity may contribute to such land having a high nature conservation value. It is therefore appropriate that such a consideration is identified as a criterion; NA 131 proposes such an addition.

*Whether pollution should be identified as a criterion*

6. As the only waste that can be deposited under this Policy would be inert there is no need to refer to matters relating to pollution in the Policy, nor is there a need to undertake any future monitoring of the land.

*Reference to an Environmental Impact Assessment*

7. The circumstances in which an EIA is required is set out in legislation. In the interest of conciseness it is not desirable to refer to the potential requirement for an EIA in every instance where this could arise. No change to the Plan is necessary in response to this issue.

*Registering waste disposal activities with the Environment Agency*

8. NA 132 explains that under the control regime administered by the Environment Agency inert fill for the purposes of improving farmland, whilst not requiring a licence, needs to be registered. Such a modification to the Plan aids clarity and should be incorporated.

*Approval from the Welsh Assembly agricultural division*

9. Objection has been raised on the basis that the Policy should include a reference to the need for approval from the Welsh Assembly agricultural division. The reason for this suggestion is not clear, but whilst the Council may wish to seek the advice of that body in relation to planning applications where this policy would be relevant, the responsibility for determining applications rests with it as the local planning authority. Any control directly administered by another body is not a matter that needs to be addressed by the Plan. I conclude that there is no need to change the Policy in this respect.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0345) that the DD be modified by the deletion of the title and replacement with "THE USE OF INERT WASTE TO IMPROVE AGRICULTURAL LAND";**

**(REC.0346) that the DD be modified by the deletion of "can" and replacement with "are" in the second line of the Policy;**

**(REC.0347) that the DD be modified by the deletion of criteria 3, 6 and 8;**

**(REC.0348) that the DD be modified by the insertion of an additional criterion relating to nature conservation, as proposed by NA 131;**

**(REC.0349) that the DD be modified by the insertion of a reference to the requirement to register with the Environment Agency in the supporting text, as proposed by NA 132;**

**(REC.0350) that the DD be modified by the insertion of the reference in NA 132 to the activity being a waste disposal operation in its own right should be included;**

**(REC.0351) that the DD be modified by the insertion of "and necessary" after "identifiable" in paragraph 4.4.13;**

**(REC.0352) that no other modification be made to the DD in response to these objections and, in particular, that NA 131 and 132 be not accepted other than the specific elements identified in the above recommendations.**

**POLICY C25 – RECYCLING FACILITIES INCLUDING SEPARATION, TRANSFER, COMPOSTING AND INCINERATION (WITH OR WITHOUT FACILITIES FOR ENERGY RECOVERY)**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA133

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/105	Welsh Assembly Government		539
B/767/1	Friends of the Earth (Mon and Gwynedd)		539
B/76/47	Mike Webb (RSPB)		539

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/15	Environment Agency Wales		539

**Main Issues**

- Does this Policy contradict Policy C21.
- Whether the Policy should include incineration.
- Would such schemes breach Environmental Impact Assessment Regulations.
- Important wetlands, water resources and water regimes.

**Inspector's Considerations and Conclusions**

*Does this Policy contradict Policy C21*

1. An objector questions the role served by this Policy bearing in mind Policy C21, as revised, and suggests that it ought to be re-worded or at least partly deleted. The purpose served by this policy is not clear to me, particularly in the light of Policy C22 and the significant revisions proposed to Policy C21. Policy C22 is a general policy that requires proposals for waste management facilities to accord with principles such as the waste hierarchy and the proximity principle as well as a number of site specific tests.

2. The scope of Policy C25 encompasses incineration (with or without facilities for energy recovery). Although 'incineration' is not a facility identified in the list of waste facilities set out in Table 3 of the Plan, the table estimates the requirement

for 'energy from waste' facilities to be 0.4 units. As the Policy purports to deal exclusively with recycling facilities the inclusion of all forms of incineration is difficult to understand – the national strategy 'Wise About Waste' places incineration without energy recovery with landfill at the bottom of the waste hierarchy. Even though this contradiction has been pointed out by an objector the Council has decided not to revise the scope of the policy.

3. Whilst I appreciate the Council's desire to include a policy within its Plan that addresses incineration, this policy is not the appropriate place. It seems to me that Policy C22 would cover such facilities. Indeed it appears to me that C22 would cover all the remaining activities listed within C25 which all fall within the description of 'waste management facilities'. The requirement of C22 to adhere to the waste hierarchy would provide the encouragement for recycling ahead of disposal.

4. In its Proof of Evidence the Council claims that the reference to meeting a "local need" has been removed by NA 133 – it has not. Such a requirement is at odds with the regional approach that is sought by national and regional waste strategies. In any case, the identification of sites in the revision to C21 has been undertaken in order to meet the identified need.

5. In my view the Policy is superfluous and its retention will only serve to add confusion to the Plan. It ought to be deleted and any of the criteria it contains which are not covered in Policy C22 could be added to that Policy if it is deemed necessary.

*Whether the Policy should include incineration*

6. This is a matter dealt with in my consideration of the first issue.

*Would such schemes breach Environmental Impact Assessment Regulations*

7. A decision on whether a particular proposal ought to be the subject of an Environmental Impact Assessment must be taken in response to a planning application, and is not a matter that needs to be addressed under the Plan's Policies.

*Does the Policy provide adequate safeguards for of important wetlands, water resources and water regimes*

8. NA 133 introduces an additional criterion, which addresses biodiversity, water resources and drainage regimes. This addition identifies important considerations in schemes dealing with waste recycling.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0353) that the DD be modified by the deletion of Policy C25 and the supporting text in its entirety and to add any criteria set out therein to Policy C22, or to modify criteria in C22, as is deemed necessary;**



**(REC.0354) that no other modification be made to the DD in response to these objections and, in particular, that NA 133 be not accepted.**

## 4.5 RENEWABLE ENERGY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA134; NA135

This Section is subject to Further Proposed Changes Nos; NAP 101

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/989/4	Future Energy Solutions	Martin Miller	634

#### Note

- Within this section I address part of objections B/989/1 and 3 in addition to the representation identified above.

#### Main Issues

- Whether the reference to Government targets should be updated.
- National planning policy and research work.

#### Inspector's Considerations and Conclusions

##### *Whether the reference to Government targets should be updated*

1. The Council accepts the objector's comments and has sought to address these in revisions it has introduced under NA 134. I concur with these changes.

##### *National planning policy and research work*

2. An objector suggests that a reference to Government policy and to a study undertaken in 2001 would be useful additions to the renewable energy section of the Plan. In my opinion it would be helpful to make reference to the latest sources of national policy and advice: Ministerial Interim Planning Policy Statement (MIPPS) 01/2005 and the revised TAN8, both entitled 'Planning for Renewable Energy', but that reference to a study of renewable energy resources in Wales is not necessary.

3. The Council proposes a Further Proposed Change which reflects changes in national policy, as detailed above, that have occurred since the Pre-inquiry Proposed Changes version of the Plan was prepared. Bearing in mind the position set out in a letter from WAG on 1 July 2003 on new national planning policy and technical guidance in the context of UDP preparation, I am satisfied that it is appropriate for me to consider NAP 101, whilst appreciating that this will be subject to public scrutiny through the proposed modifications process. On the basis of the available information I consider that this Further Proposed Change is generally acceptable, with one exception. Read literally the reference to "developing on-

shore sources of wind" is incorrect and should be replaced by a term such as that used in the MIPPS – "on shore wind energy development".

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0355) that the DD be modified by the acceptance of NA 134 as amended by NAP 101 as further amended by the following:**

- **the addition of a reference to latest sources of national planning policy and advice within paragraph 4.5.1;**
- **the deletion from NAP 101 of "developing on-shore sources of wind" and replacement with a form of words along the lines of "on shore wind energy development";**

**(REC.0356) that the DD be modified by the acceptance of NA 135 as further amended in accordance with the comments contained in the section of this report dealing with Policy C26 (the first issue therein);**

**(REC.0357) that no other modification be made to the DD in response to these objections.**

## POLICY C26 - WIND TURBINES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA136

This Section is subject to Further Proposed Changes Nos: NAP 99: NAP104

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/22	CCW		557
B/1034/14	National Trust Wales		557
B/767/7	Friends of the Earth (Mon and Gwynedd)		557
B/76/48	Mike Webb (RSPB)		557
B/844/13	CPRW		557

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/20	Gwynedd Archaeological Trust		557
B/734/106	Welsh Assembly Government		557
B/734/107	Welsh Assembly Government		557
B/734/108	Welsh Assembly Government		557
B/989/1	Future Energy Solutions		557

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/866/21	Snowdonia National Park Authority		
B/76/49	Mike Webb (RSPB)		

## Note

- In its Proof of Evidence 557 the Council refers to NAP 100. Based on the Council's schedule of Further Proposed Change I have taken this to be an error which ought to have read as NAP 99.

## Main Issues

- Nature conservation, the historic environment and the landscape.
- Wind energy developments within the Llyn AONB.
- Is criterion 3 too restrictive.
- Should renewable energy developments take priority over existing electro magnetic transmitting/receiving systems.
- Noise and health implications.
- Is there a need for minor re-wording of the Policy.
- The Council's Further Proposed Changes.
- Mode of expression.

## Inspector's Considerations and Conclusions

*Should the Policy include safeguards for nature conservation, the historic environment and the landscape*

1. Objectors are concerned that the Policy does not include safeguards for interests of nature conservation, the historic environment and the landscape. In response the Council explains that, in order to avoid unnecessary duplication, its approach has been to avoid including matters within one policy which are covered in another. I recognise the advantage of such an approach in terms of conciseness but it is evident that this approach has not been consistently applied to all policies. In this case the Policy is one of many which contains a form of words along the lines of "proposals will be approved provided that all the following criteria are met". This gives the impression that the policy has a degree of self-containment in terms of the matters that would need to be assessed at planning application stage.

2. In the interests of clarity it would seem beneficial in such cases that there are no significant omissions from the listed criteria. Moreover there are several instances where the Council proposes additional criteria via Pre-inquiry Proposed Changes despite such matters being covered in another policy. Such inconsistency can lead to confusion and I suggest that the Council re-consider its approach across the Plan in order to achieve a more consistent approach. It seems to me that the identification of archaeology among the criteria would provide prominence to a matter likely to be an important consideration in some cases, without adding significantly to the length of the Policy. Despite objectors' concerns in relation to visual impact, landscape and nature conservation I consider that these matters are adequately covered in criteria 2 and 3 of the Policy. One objector raises a particular concern regarding the impact on wildlife during construction work. As this would fall within the consideration of the impact on nature conservation there is no need to make a specific reference to the matter.

3. I note that it is proposed, via NA 135, to include a more detailed list of the most relevant policies in relation to Policy C26 and C27 at the beginning of the Renewable Energy section of the Plan. Whilst this is a useful cross-reference for users of the Plan consideration should be given to further broadening the collection

of policies identified for instance by including B3 (the setting of listed buildings), B4 (the setting of conservation areas), B10 (Landscape Conservation Areas), B12 (historic landscapes, parks and gardens) and the new policy dealing with the setting of the National Park proposed by NA 99. The introduction of such a cross-reference would address the concerns of objectors regarding the potential impact of wind farms on such buildings/areas.

*Does the Policy deal appropriately with wind energy developments within the Llyn AONB*

4. As an objector points out, criterion 1 of the DD is written in such a way that it creates a policy vacuum in terms of sites within the AONB and those that affect the setting of AONBs or the National Park. It seems that the Council sought to 'plug this gap' by introducing changes through NA 136. In its DD and Pre-inquiry Proposed Change versions the Policy defines "windfarms" as being 2 or more turbines. By implication the Policy, in its revised form, is supportive of single turbines not only within the AONB but also on sites that would have an "unacceptable impact on the setting" of an AONB or National Park. Furthermore, such schemes are not covered by the Policy's second paragraph, and thus would not be required to comply with the criteria listed thereafter.

5. Relevant national policy and advice is contained in Ministerial Interim Planning Policy Statement (MIPPS) 01/2005 and TAN8 both entitled 'Planning for Renewable Energy'. They were published after the preparation of the Pre-inquiry Proposed Changes version of the Plan. An objector who considers that the Policy's approach is too restrictive in relation to AONBs relies on national guidance set out in Planning Policy Guidance 22, but as this applies only in England I have assessed this concern in the context of the policy framework provided by WAG. Paragraph 12.8.11 of MIPPS deals with National Parks and AONBs and informs that in such nationally designated areas the "development of wind farms or other large scale renewable energy schemes will not generally be appropriate".

6. In its Proof of Evidence the Council explains that it is "not in a position to introduce a blanket refusal of all individual wind turbines in the AONB" on the basis that to do so would be contrary to these latest expressions of Government policy. However, in the context of protecting nationally designated areas there is no indication in MIPPS or the TAN of what is meant by 'wind farms' neither is there any reference to single turbine developments. Thus, it seems to me that the threshold of 2 turbines is an arbitrary one for which there appears to be no justification. In terms of the likely impact of a scheme on the important characteristics of either of these designated areas there seems to be no cogent reason to believe that a single turbine scheme is likely to be materially more acceptable than, say, a pair of turbines. Indeed it is likely that the first turbine would have the greatest single visual impact.

7. The importance attached by WAG to promoting renewable energy projects is clear and, in the short-term, it sees wind-power as offering the greatest potential for an increase in the generation of electricity from such energy. Nevertheless, it also recognises the need to minimise the impact on the environment and landscape. Its strategy seeks to strike a balance between these interests by concentrating on a few large scale wind farms in carefully located areas, known as Strategic Search Areas (SSAs). No part of the Plan area falls within this designation. The TAN indicates, in paragraph 2.13, that it is acceptable for local

policies in development plans to restrict almost all wind energy developments, larger than 5MW, to within SSAs and urban/industrial brownfield sites. Developments below this threshold are termed 'small'.

8. Thus, it seems to me that within the Llyn AONB, or on sites which would affect the setting of AONBs or the National Park, there is no justification for the Policy to be anymore supportive of proposals for all types of single turbines than, for instance, of a small-scale, multi-turbine scheme. I suggest that all phrases that seek to distinguish between single turbine developments and wind farms are deleted from the Policy and replaced by the generic term "wind turbine developments". In line with latest national policy I suggest that specific reference is made to *domestic* (rather than *single*) wind turbine developments in addition to the community based schemes referred to in NAP 99. The Council should consider whether to adopt a different approach to such development according to whether they are proposed within or outside the AONB.

*Is criterion 3 too restrictive*

9. In response to an objection that the requirement set out in criterion 3, that there should be no detrimental impact on the landscape or nature conservation features, was unduly restrictive the Council has proposed a rewording through NA 136. The change qualifies "detrimental" with "unacceptable". I concur with the need for a form of qualification but consider that reference to 'acceptability' is not suitable given that would lead the decision maker to reach a view on the scheme's overall acceptability as part of the process of determining whether it would conflict with the policy in question. A decision on acceptability ought to be undertaken at a later stage of the process of determining a planning application - when all material considerations are weighed against any conflict with the development plan. A more appropriate phrase would be "significant harm". Other changes proposed by the Council in the wording of this criterion improve clarity in the terms of the cumulative effect.

*Should renewable energy developments take priority over existing electro magnetic transmitting/receiving systems*

10. I note that in response to an objection suggesting that the term "appropriate steps" in criterion 5 should be defined, the Council has sought to omit this term and to re-phrase the criterion as set out in NA 136. An objector considers that the importance of achieving greater use of renewable energy is such that the Policy ought to state that wind farm developments should override any interference to electro magnetic systems. I disagree – it would not be reasonable for a Policy to be prescriptive in terms of the requiring one consideration to assume precedence over another. I consider that the introduction of the word "significant" to qualify the term "interference" would strike an appropriate balance by requiring the decision maker to consider the seriousness of any impact on electro magnetic transmissions together with the implications of any such impact in evaluating whether a particular scheme aligned with the Policy. The insertion of 'significant' would also align with the Council's suggested change to criterion 3.

*Noise and health implications*

11. An objector suggests that turbines should be sited well away from dwellings, schools, etc, on the basis that noise and health problems are not yet properly

understood. Criterion 4 deals with environmental impact and effect on amenity. In my view this is an adequate safeguard which will allow the decision maker to take into account the effect of a particular scheme on neighbouring residents/occupiers of buildings. There is no need to amend the Policy in response to this concern.

*Is there a need for minor re-wording of the Policy*

12. The Council rightly accepts that the phrases "presumption in favour" and "detrimental" as used in the DD are inappropriate. These matters are addressed through NA 136. The Welsh version of the same Pre-inquiry Proposed Change also provides a more precise translation of "cumulative". These changes are all considered to improve the Plan.

*Whether the Plan should incorporate the Council's Further Proposed Changes*

13. The Council has introduced Further Proposed Changes NAP 99 and 104. The latter merely corrects what appear to be minor typographical errors in the Welsh version which should be incorporated in the Plan. It seems to me that NAP 99 seeks to reflect the changes at national level that I have referred to above. In seeking to update the Plan in this respect the Council has followed the advice on new national planning policy and technical guidance sent to Chief Planning Officers by WAG in July 2003. However, it seems to me that given the significance of the proposed changes which inevitably involve a degree of interpretation of national policy, these changes may stimulate a response from interested parties. Given that public consultation on these changes has not been undertaken these are matters best dealt with as part of the proposed modifications process which will provide a forum to elicit the views of interested parties. Notwithstanding this, the Council may wish to consider whether it has failed to delete text in the opening line of the second paragraph – it seems that "or windfarms" should be omitted. If this is the case, the Policy is silent in relation to wind farms that fall outside "small community ... schemes".

*Mode of Expression*

14. The extent of changes proposed by the Council via NA 136 and NAP 99 is testimony to its acceptance of the need to significantly alter the DD and I concur with the need to amend the Policy. I consider that the changes proposed by NA 136 are a step in the right direction. Nevertheless, for reasons I set out in my assessment of the preceding main issues, there are further changes that are necessary. In the interests of clarity, rather than seeking to adapt the inadequate intermediate text proposed by the Council since the DD, I shall set the Pre-inquiry Proposed Change of the Policy to one side and recommend changes to the DD version.

15. As explained above NAP 99 introduces substantive changes to the Policy. Whilst I consider that, in broad terms, the revisions that it seeks to introduce are necessary, I am mindful that my assessment of these changes is not informed by any comments that may have arise had the change been exposed to public consultation. In the circumstances I am unable to recommend the acceptance or modification of such a significant change to the Plan. The proposed modifications process will provide an opportunity for formal public consultation on the changes to this policy that are necessary in order to reflect the latest national policy.



## RECOMMENDATIONS

I recommend:

(REC.0358) that the DD be modified by the deletion of the title and replacement with "WIND TURBINE DEVELOPMENTS" and that all other references that draw a distinction between individual wind turbines and windfarms be replaced by the more generic term "wind turbine developments";

(REC.0359) that the DD be modified by the insertion of a new sentence at the beginning of the Policy along the lines of "Proposals for wind turbine developments on sites within the AONB will be refused." unless further refinement is deemed appropriate in response to REC.0362;

(REC.0360) that the DD be modified by the deletion from the opening paragraph of the Policy of "There will be a presumption in favour of proposals for individual wind turbines or windfarms" and replacement with "Proposals for wind turbine developments will be approved", and within the same paragraph the deletion of "including any ancillary associated developments (e.g. buildings/structures, car parking areas, fences, roads etc.);

(REC.0361) that the DD be modified by the deletion of criterion 1 and replacement with "that the development would not have a significantly harmful impact on the setting of the Llyn or Anglesey AONBs or the Snowdonia National Park;

(REC.0362) that the DD be modified by the insertion of "(eg buildings/structures, car parking areas, fences, roads etc)" after "ancillary developments" in criterion 2;

(REC.0363) that the DD be modified by the deletion of "conjunction" from criterion 3., and the insertion of "(either individually or combined", the insertion of ")" after "developments" and the insertion of "significant" after "not have a" in the same criterion;

(REC.0364) that the DD be modified by the deletion of "appropriate steps have been taken to avoid" in criterion 5. and replacement with "the development will not create significant", and in the same criterion the deletion of "or, where possible, agreement can be reached on appropriate mitigation measures" and replacement with "that cannot be adequately mitigated";

(REC.0365) that the DD be modified by the inclusion of an additional criterion that seeks to safeguard archaeology from significant harm;

(REC.0366) that the DD be modified by the acceptance of NAP 104;

(REC.0367) that the DD be modified in such a way as to reflect the latest national planning policy and advice contained in MIPPS 01/2005 and TAN8 including that a distinction is drawn between large- and small-scale wind

turbine developments, and specifically addressing domestic as well as community-based schemes;

**(REC.0368) that the DD be modified by the wording of criterion 3 in line with the changes set out in NA136;**

**(REC.0369) that no other modification be made to the DD in response to these objections and, in particular, that NA 136 and NAP 99 be not accepted.**

## POLICY C27 – OTHER FORMS OF RENEWABLE ENERGY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA137

This Section is subject to Further Proposed Changes Nos: NAP4

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/27	Sustainable Gwynedd Gynladwy		15

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/874/3	Peter Marston		558
B/989/3	Future Energy Solution Ltd	Martin Miller	558

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/866/22	Snowdonia National Park Authority		

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/874/2004	Peter Marston		

### Main Issues

- Pump storage schemes.
- Renewable energy developments within the Llyn AONB.
- Whether the final sentence of paragraph 4.5.6 is complete

### Inspector's Considerations and Conclusions

#### *Pump storage schemes*

1. In response to an objection the Council has introduced NA 137. This change acknowledges the significant contribution that pump storage schemes can make to

an energy management scheme. Linked to this, the change also draws a distinction between *renewable* energy development schemes and *sustainable* energy development schemes but is equally supportive of both types. To avoid confusion the title of the Policy ought to be altered to reflect this distinction.

*Renewable energy developments within the Llyn AONB*

2. An objector suggests that, whilst the Policy deals with major developments within the AONB or which affect the setting of AONBs or the National Park, its approach to smaller developments within these areas is not clear. It seems to me that the Policy as written implies that it is supportive of such smaller developments not only within the AONB but also on sites that would have an “unacceptable impact on the setting” of an AONB or National Park. This cannot be the intention - the Policy ought to be revised so that it is clear in its approach to development that would have an unacceptable impact on the setting of these nationally designated areas.

3. The objector also considers that the Policy's approach is too restrictive in relation to AONBs and relies on national guidance set out in Planning Policy Guidance 22; as this applies only in England I have assessed this concern in the context of the policy framework provided by WAG. Relevant national policy and advice is contained in Ministerial Interim Planning Policy Statement (MIPPS) 01/2005 and TAN8 both entitled ‘Planning for Renewable Energy’. They were published after the preparation of the Pre-inquiry Proposed Changes version of the Plan. Paragraph 12.8.11 of MIPPS deals with National Parks and AONBs and informs that in such nationally designated areas the “development of wind farms or other large scale renewable energy schemes will not generally be appropriate”. Thus I do not share the objector's view that the Policy is too restrictive in this respect.

4. The Council does not explain the reason for the use of 5MW as its lower threshold for defining a ‘major’ scheme in relation to this Policy. Although this figure is used in MIPPS, it is applied only to wind energy developments. In the absence of an alternative means of distinguishing between major and small-scale I consider that the Council's approach is acceptable for sites within AONBs, but that it should include a proviso that small-scale schemes should not cause significant harm to the special qualities of the AONB. For areas outside the AONB, but which could affect the setting of the either AONB or the National Park, there would appear to be no justification for setting a size threshold. Not only is there no national policy basis for so doing, but the likely impact of a scheme on the setting of such areas will not only depend on its size but its distance from the designated area. Instead the Policy ought simply to resist schemes that would significantly harm the setting of such areas.

*Whether the final sentence of paragraph 4.5.6 is complete*

5. Although no change was initially suggested by the Council to address this objection, it now accepts the need to alter the supporting text so that the final sentence of paragraph 4.5.6 includes “wind powered” before “renewable energy”. As this change, set out in NAP 4, merely addresses a minor error I can recommend its inclusion in the Plan.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0370) that the DD be modified by the deletion of the title and replacement with a form of wording along the following lines "RENEWABLE AND SUSTAINABLE ENERGY SCHEMES";**

**(REC.0371) that the DD be modified by the acceptance of NA 137 as further amended by redrafting the first criterion in line with my comments in relation to the second main issue, ie to include a reference to the need to protect the Llyn AONB and setting of both AONBs and the National Park from development that would harm their special qualities, and that the reference to major renewable energy development schemes is limited to schemes within the AONB;**

**(REC.0372) that the DD be modified by the acceptance of NAP 4;**

**(REC.0373) that no other modification be made to the DD in response to these objections.**

## 4.6 NATURAL RESOURCES – BACKGROUND

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA138

This Section is subject to Further Proposed Changes Nos: NAP83

### Objections to Deposit Draft

Objection Ref	Name of Objector	Agent	Response Ref
B/866/23	Snowdonia National Park Authority		237
B/734/109	Welsh Assembly Government		237

### Note

- The number that appears in the main title box above ought to refer to 4.6, not 4.5.

### Main Issues

- Should the Plan refer to the “plan area” rather than “Gwynedd”.
- In describing high quality agricultural land should the Plan adopt the same terminology as PPW.

### Inspector’s Considerations and Conclusions

*Should the Plan refer to the “plan area” rather than “Gwynedd”*

1. Pre-inquiry Proposed Change NA 138 avoids giving the impression that the Plan covers the whole of the county of Gwynedd and is a change that should be incorporated into the Plan.

*In describing high quality agricultural land should the Plan adopt the same terminology as PPW*

2. Further Proposed Change NAP 83 introduces the same term as set out in PPW, “best and most versatile” land, which avoids the potential confusion that would have arisen as a result of the previous term which referred to “best and most productive”. Bearing in mind the minor nature of this change I am satisfied that it is appropriate for me to consider NAP 83, whilst appreciating that this will be subject to public scrutiny through the proposed modifications process. Any comments received in relation to this change would need to be carefully considered.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0374) that the DD be modified by the acceptance of NA 138 as further modified by NAP 83;**

**(REC.0375) that no other modification be made to the DD in response to these objections.**

## POLICY C28 – SAFEGUARDING AGRICULTURAL LAND

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA139

This Section is subject to Further Proposed Changes Nos: NAP78; NAP79

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/110	Welsh Assembly Government		237
B/844/14	CPRW		237

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2077	CPRW		237

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2096	Environment Watch Wales & the Borders		

### Note

- I have taken into account objection ref no B/866/23 (Snowdonia National Park Authority) even though it has not been identified in the above table.

### Main Issues

- The protection of lower grade agricultural land.
- Should the Policy and explanatory text be rewritten to better reflect national policy in PPW

### Inspector's Considerations and Conclusions

*Should the policy seek to protect lower grade agricultural land*

1. The DD seeks to protect agricultural land of all quality, with particular emphasis to higher quality land. An objector contends that, to reflect the fact that Gwynedd is characterised by lower quality agricultural land, such land should be afforded the same degree of protection as higher quality land. I disagree - there is no cogent reason for affording greater protection to such areas of agricultural land



than the generally restrictive countryside policies of the plan and, in some areas, the specific protection offered by nature conservation policies. On the other hand, the relative scarcity of high quality agricultural land in the Plan area means that it is a particularly valuable resource for the farming industry which needs special protection. NA 139 omits the reference to agricultural land other than grade 1, 2 and 3a and thus ensures that the Policy better aligns with the approach to protecting higher quality agricultural land as set out in national policy.

*Should the Policy and explanatory text be rewritten to better reflect national policy in PPW*

2. Pre-inquiry Proposed Change NA 139 introduces revisions which more closely align with national policy as set out in PPW but it needs to be redrafted to correct grammatical errors. There is also a need to alter the wording and arrangement of the criteria as set out in NA 139 to improve its clarity. Firstly, "overriding need for the development" should be a standalone requirement which is a prerequisite in all cases. The presence of the word "or" immediately before criterion 2 suggests that it is sufficient only to meet that second criterion. The evaluation of alternatives need only be undertaken in circumstances where there is an overriding need that would be sufficient to justify development on land which the Policy seeks to protect. Furthermore, the explanatory text should offer guidance to developers as to what would represent an 'overriding need'. By rewording and rearranging the numbered criteria of the Policy the significance of alternative sites should be better explained. In the interests of clarity, I have set NA 139 to one side in my recommendations given the deficiencies of this intermediate text. Nevertheless I have incorporated much of its content with specific recommendations.

3. The deletion of criterion 3 from the Policy as proposed in Further Proposed Change NAP 79 merely corrects the failure to do so in the drafting of NA 139. The introduction of the term "best and most versatile" instead of "best and most productive" encompassed in NA 139 avoids potential confusion by adopting the description used in PPW. As both these further changes reflect national policy they should be included within the Plan.

4. NAP 78 seeks to correct the failure of the Welsh version of the Pre-inquiry Proposed Change draft of the Plan to fully incorporate the intended change introduced by NA 139 which sought to replace "cynhyrchiol"(productive) with "amlddefnydd" (versatile) in the explanatory text at paragraph 4.6.4. However, the latest version fails to specify the word 'amaethyddol' (agricultural) which ought to appear after "tir" (land). For clarity of expression I will set this further change to one side, incorporating its effect within my recommendations.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0376) that the DD be modified by the deletion of "agricultural land, particularly the best and most productive agricultural land (grade 1, 2 and 3a)" and its replacement with "grade 1, 2 or 3a agricultural land";**

**(REC.0377) that the DD be modified by the insertion of "there is an overriding need for the development and" in the opening sentence of the**

**Policy, immediately after “will be refused unless” before the colon punctuation mark;**

**(REC.0378) that the DD be modified by the deletion of all three criteria and replacement with a form of wording along the following lines:**

- “1. there is no previously developed land available;**
- 2. there is no land of lower agricultural grades available, other than land that has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs agricultural considerations.”;**

**(REC.0379) that the DD be modified by the deletion of “agricultural land, especially” and “productive land” from paragraph 4.6.4 and the insertion of “versatile agricultural land (grades 1,2 and 3a) immediately after “best and most”;**

**(REC.0380) that the DD be modified by inclusion within supporting paragraph 4.6.4 of an indication of what constitutes an overriding need;**

**(REC.0381) that the DD be modified by the acceptance of NAP 79;**

**(REC.0382) that no other modification be made to the DD in response to these objections and, in particular, that NA 139 and NAP 78 be not accepted other than insofar as they are incorporated within the above recommendations.**

## POLICY C29 – SAFEGUARDING WATER RESOURCES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA140; NA141

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/16	Environment Agency Wales		133
B/734/111	Welsh Assembly Government		133
B/756/42	Environment Watch Wales and the Borders		133

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2097	Environment Watch Wales & the Borders		133

### Main Issues

- Freshwater ecosystems, refer to “surface water” instead of “water courses” and “open stretches of water.
- The reference to water abstraction.
- Effect on agriculture, biodiversity etc.

### Inspector’s Considerations and Conclusions

#### *Freshwater ecosystems and surface water*

1. In response to an objection Pre-inquiry Proposed Change NA 140 introduces a reference to freshwater ecosystems and replaces the terms “water courses” and “open stretches of water” with “surface water”. As such changes improve the clarity of the Plan I conclude that they should be incorporated.

#### *The reference to water abstraction*

2. In line with an objector’s suggestion, the Council proposes, via NA 141, to delete the reference to “water abstraction”. As this change addresses an error in the DD the plan should be amended in this respect.

*The possible effect on agriculture, biodiversity etc*

3. Although the Council in its Proof of Evidence suggests that this is a matter addressed in NA 141 this is not so. I see no reason for not including a specific reference to the effects on agriculture, biodiversity etc within the supporting text.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0383) that the DD be modified by the acceptance of NA 140;**

**(REC.0384) that the DD be modified by the acceptance of NA 141;**

**(REC.0385) that the DD be modified by the deletion of "these activities" from the end of the third sentence of paragraph 4.6.6 and replacement with "such proposals on agriculture, biodiversity etc";**

**(REC.0386) that no other modification be made to the DD in response to these objections.**

## OMMISSION POLICY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA124; NA125; NA143

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/96	Welsh Assembly Government		225

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1431/2001	D F Good		226
B/1441/2004	R Powell & S M Lloyd		226

### Notes

- There is a spelling error in the title.
- Objection B/734/96 is partly dealt with in the section of the report dealing with Policy C22. The above mentioned objections to the Pre-inquiry Proposed Change are also dealt with in the same section, as are Pre-inquiry Proposed Changes NA 124 and 125.

### Main Issue

- Provision of waste management facilities within new developments.

### Inspector's Considerations and Conclusions

1. In accordance with the provisions of PPW, an objector considers that the UDP should contain policies proposing that any major new development should incorporate adequate and effective waste management facilities. The Council agrees and proposes a New Policy through NA 143. Although criterion 6 of C5 deals with the same matter it does so in a broad manner within the context of sustainable building considerations. The level of detail and the targeting of larger scale developments contained in the New Policy justify its inclusion in the Plan. I suggest that the first criterion is reworded so that it explains what is meant by 40 units, by inserting 'residential' before 'units'.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0387) that the DD be modified by the acceptance of NA 143 as further amended by the insertion within the first criterion of 'residential' before 'units';**

**(REC.0388) that no other modification be made to the DD in response to these objections.**

## OMMISSION POLICY – USE OF INDUSTRIAL SITES (CLASS B2)

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA143

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/95	Welsh Assembly Government		644

### Notes

- Objection B/734/95 is dealt with in the section of my report dealing with Policy C21.
- The box heading above refers to NA 143 but this Pre-inquiry Proposed Change is addressed in the section titled "Omission [sic] Policy" within this Chapter.

## OMMISSION POLICY – REDEVELOPMENT SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA142

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/160	Welsh Assembly Government		299
B/734/188	Welsh Assembly Government		164
B/985/3	Welsh Highland Railway	Graham Farr	647
B/985/1	Welsh Highland Railway	Graham Farr	647

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/985/2017	Welsh Highland Railway Ltd	Graham Farr	

### Main Issue

- Whether the Plan should contain a policy to address areas designated for redevelopment

### Inspector's Considerations and Conclusions

1. In response to objections the Council has introduced NA 142, which proposes a New Policy on 'Redevelopment Sites'. This policy fills a previous void in the Plan by providing a link for the reader between the areas identified on the maps as redevelopment areas and the detailed requirements set out in the various development briefs, as well as referring to the possibility of masterplans. As it introduces greater clarity to the Plan it should be incorporated.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0389) that the DD be modified by the acceptance of NA 142;**

**(REC.0390) that no other modification be made to the DD in response to these objections.**

## MONITORING

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

This Section is subject to Further Proposed Changes Nos: NAP7; NAP54; NAP84

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/28	Sustainable Gwynedd Gynladwy		10
B/734/112	Welsh Assembly Government		307

### Main Issues

- Should the performance indicator and target for the energy rating of new buildings be measured against the requirements of the Building Regulations.
- Should the performance indicator and target for the energy rating of new buildings be measured as a percentage rather than a total number.
- The title of the monitoring section.
- The FRCA as a Key Partner.

### Inspector's Considerations and Conclusions

*Should the performance indicator and target for the energy rating of new buildings be measured against the requirements of the Building Regulations*

1. To measure the success of the Plan in a way that includes meeting the minimum standard set by another statutory regulation would be meaningless. This is recognised by the Council in their Further Proposed Change NAP 7 which rather than referring to the standard set by Part L of the Building Regulations being equalled or bettered, seeks only to record instances where the minimum standard has been surpassed. However, this change raises the question of how helpful such a measurement would be given that a nominal improvement above the standard would meet the test although it may not result in a materially higher standard. Although an objector suggests specifying a standard 10% higher than that sought by Building Regulations, no evidence has been provided to support the appropriateness of this figure or the practical implications of seeking to impose such a requirement.

2. TAN 8 confirms that WAG considers that the standards established under the EcoHomes scheme for residential development and BREEAM scheme for other development form a useful framework for energy efficiency consideration. The specific mention of BREEAM as an addition to EcoHomes in both the indicators and target columns would be beneficial. Furthermore, given that the BRE standards include a range varying from pass to excellent, monitoring should be based on the

various rating categories. Given the value of using these standards reference to Building Regulations appears to be superfluous, not least given the misgivings I set out in the preceding paragraph. Such reference ought to be deleted unless there is sound evidence to show that measuring success on the basis of being better than Building Regulations would provide valuable information that would not be gleaned through the EcoHomes and BREEAM schemes.

*Should the performance indicator and target for the energy rating of new buildings be measured as a percentage rather than a total number*

3. In terms of monitoring the success of the Plan in reducing the long term effects of development on the environment performance indicators are measured as a percentage. It is, therefore, anomalous that the targets that follow are based on totals rather than a proportion. Moreover, reliance on totals is inappropriate as it could be achieved merely as a result of an increase in the overall numbers of development projects, rather than by a greater emphasis on re-using buildings and in new buildings improving their energy rating and making better use of renewable energy. NAP 54 addresses this anomaly.

*The title of the monitoring section*

4. As the title of the Chapter is "Prudent use of natural resources" there is no reason for replacing the first word with "effective", as suggested by an objector, in relation to the headings set out within the monitoring section.

*The FRCA as a Key Partner be altered*

5. As a result of organisational changes by WAG the reference to the "FRCA" is now out-of-date. NAP 84 addresses this by replacing it with "Technical Services Division, Welsh Assembly Government"

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0391) that the DD be modified by the acceptance of NAP 54;**

**(REC.0392) that the DD be modified by the acceptance of NAP 84;**

**(REC.0393) that the DD be modified by the deletion from both the Indicators of Policy Performance and the Targets of the clauses that refer to the standards set by Part L of the Building Regulations;**

**(REC.0394) that the DD be modified by insertion of the acceptance of "/BREEAM" after "EcoHomes" as an Indicator of Policy Performance and a suitable corresponding reference in the adjacent Target column;**

**(REC.0395) that no other modification be made to the DD in response to these objections.**

## GENERAL – CHAPTER C

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/55	CPRW		236
B/844/52	CPRW		235

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/53	CPRW		

### Note

- Objection 844/52 raises concerns regarding 2 distinct elements of Section C – the location of new development and the conversion of buildings in rural areas. I addressed the former concern within Policy C1 of this report, the latter in C4.
- Objection B/844/55 is also dealt with in the part of this report which deals with Policy C5.

### Main Issue

- Energy conservation and energy production

### Inspector's Considerations and Conclusions

1. The aim of ensuring that development proposals do not unacceptably impact on the environment and the general support for the provision of energy from renewable resources are set out in Strategic Policies 6 and 9 respectively. More detail is added within Part 2, Chapter C – Policy C5 deals with building in a sustainable manner, which includes energy conservation measures, and Policies C26 and C27 deal with renewable energy. Subject to the comments on the wording of these policies set out elsewhere in this report, the Plan's approach to these issues broadly accords with the thrust of current national policy. The objector suggests identifying energy conservation as an issue within development briefs. These briefs are not part of the UDP and thus fall outside my remit, although the Council may wish to take on board this suggestion as a means of increasing the prominence of this consideration. I conclude that there are no changes that are needed to the Plan in response to these objections.

**RECOMMENDATION**

**I recommend:**

**(REC.0396) that no modification be made to the DD in response to these objections.**

## BANGOR GOODS YARD, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/3	Network Rail Infrastructure Ltd		498

### Note

- In addition to the objection recorded above I have also taken into account objection B/844/35 by the CPRW.

### Main Issues

- Whether the Bangor railhead should be protected and coloured pink on the Inset Map.
- Is there a need for flexibility in the approach to the site's redevelopment.

### Inspector's Considerations and Conclusions

#### *Protection of the Bangor railhead*

1. An objector seeks the identification of the Bangor railhead as a Protected Rail Terminal and Wharf on the Inset map. In response the Council points to the fact that any redevelopment scheme would be assessed against Policy C15, which safeguards existing and potential railhead and wharfage facilities. It explains that the protection of the railhead would be an important consideration in any redevelopment scheme. The Plan's approach in this respect is inconsistent - there are other redevelopment sites identified in the Plan which have areas safeguarded as a Protected Rail Terminal and Wharf and coloured pink on the relevant map. There is no dispute that the railhead area should be protected. Rather than relying on a development brief or masterplan it seems to me that its protection should be secured through its designation by the Plan. This would not only provide a greater protection but would also avoid any potential confusion for would-be developers.

#### *Is there a need for flexibility in the approach to the site's redevelopment*

2. The objector explains that there are operational railway issues that need to be resolved prior to the site's redevelopment, and also raises the matter of a proposed footbridge extension. As such matters fall outside the scope of Plan they are not within my remit. Rather they are detailed considerations which will ultimately fall to be determined at the planning application stage. The Council explains that whilst it would generally expect any scheme to comply with the

development brief which has been prepared for the site it also maintains that the brief is intended only as a guide to development by setting out general principles. I conclude that no changes are required in this respect.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0397) that the DD be modified by designating the relevant part of the Bangor Goods Yard site as a Protected Rail Terminal and Wharf on the Inset map;**

**(REC.0398) that no other modification be made to the DD in response to these objections.**

## HIRAEI BAY, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/750/3	John Roberts		502
B/750/1	John Roberts		502
B/844/35	CPRW		502
B/1345/3	Margaret Player		502

### Conditionally Withdrawn Objections to Draft Deposit

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/38	CPRW		502
B/790/31	Gwynedd Archaeological Trust		502

### Notes

- Objection B/844/35, by the CPRW, is dealt with in the section of the report on the Redevelopment Sites at Bangor Goods Yard.
- This section of the report should be read in conjunction with sections dealing with the Protected Open Space at Garth Gardens and on land between Garth Road and Ffordd Islwyn. Objections B/750/1 and B/1345/3 are dealt with in those sections respectively.

### Main Issues

- Whether the access and poor quality of buildings means that the area is not suitable for designation as a Redevelopment Site.
- The car park adjacent to the Union public house.
- The historic value of the Hirael Bay.

### Inspector's Considerations and Conclusions

*Whether the access and poor quality of buildings means that the area is not suitable for designation as a Redevelopment Site*

1. In response to an objection the Council acknowledges the deficiencies of the highway access to the area and the quality of the built environment, but explains that the site's designation as a Redevelopment Site, supported by the development brief, is intended to serve as an instrument to address these problems. The Plan's intention in this respect is a laudable one. The objector also considers that the



development brief should be amended to maximise the role of the site as a gateway to the surrounding area. Whilst it is clear that the Council considers that its brief already serves this purpose, this is not part of the UDP and so lies outside the scope of my report.

*The car park adjacent to the Union public house*

2. The objector considers that the inclusion of the public house car park within the Redevelopment Site is unsuitable given the general scarcity of parking in the locality. The Council explains that it is not the Plan's intention to promote new development on all parts of the site and that the extent of the redevelopment area reflects linkages between different parts of the site. It advises that the development brief has been amended to ensure that adequate attention is given to the issue of parking in the area. It seems to me that the site's inclusion within the Redevelopment Site does not prejudice the continued provision of the facility - any proposal to redevelop the site would have to be assessed against normal development control criteria, including highway considerations, regardless of whether it is within a designated Redevelopment Site.

*The historic value of the Hirael Bay*

3. The objector feels that as one of the most important harbours in Wales, and given its past links to the quarries above Bethesda and Penrhyn Castle, the historic value of the area is so great that it should not be the subject of a comprehensive redevelopment scheme. The content of the associated design brief reinforces its concerns. In response the Council agrees that the historic character of the area is an important attribute and contends that the development brief seeks to safeguard this interest.

4. As I have already pointed out the development brief is not part of the development plan and thus falls outside my remit. It seems to me that, sensitively executed, the redevelopment of the area has the potential to achieve many benefits, including the enhancement of the built environment. This need not be at the expense of protecting the historic character of the area. The need to prepare a master plan for the site provides an early opportunity to consider features of the site that are worthy of protection. Other Plan policies, particularly in Chapter B, will require that the protection of the historic environment will be a factor to be considered in the determination of any scheme to redevelop the site.

## **RECOMMENDATION**

**I recommend:**

**(REC.0399)that no modification be made to the DD in response to this objection.**

## COED BOLYN MAWR WASTE MANAGEMENT SITE, BETHEL

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA378

### Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/1667/2003		A.LI & SE Parry		196

### Main Issue

- Whether the site is appropriate as a waste management facility

### Inspector's Considerations and Conclusions

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations, and thus I am unable to reach a view on the merits of designating this particular site. The proposed modifications procedure will provide a mechanism for full public consultation, and this will enable a properly informed decision to be made on this matter.

2. The position regarding waste disposal through landfill/land raise in the short to medium term within the northern part of Gwynedd has been a matter that has been evolving concurrently with the UDP inquiry. It is hoped that matters will be clearer by the time the Council prepare its proposed modifications to the plan.

### RECOMMENDATIONS

I recommend:

**(REC.0400) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal consultation on its allocation;**

**(REC.0401) that no other modification be made to the DD in response to these objections and, in particular, that NA 378 be not accepted.**

## COFI BAY/VICTORIA DOCK, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/567/1	Caernarfon Civic Society		1
B/844/40	CPRW		636
B/877/1	Caernarfon Harbour Trust		636

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/12	Welsh Water		636

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/760/48	CCW		

### Main Issues

- The provision of a public dock or slipway.
- Possible deficiencies in the drainage system.
- Whether the designated area should be expanded.

### Inspector's Considerations and Conclusions

#### *The provision of a public dock or slipway*

1. The designation of this area for redevelopment reflects the Council's aspirations for the environmental enhancement of the area and the introduction of a variety of uses, as a means to provide social and economic benefits for the wider area. The provision of a slipway is a matter raised by an objector. As this is a detailed matter it need not be addressed by the Plan. Such a provision could be adequately assessed in the context of a planning application on its individual merits in the light of the Plan, including specific policies dealing with maritime activities (Policy CH45) and nature conservation (particularly B14).

#### *Possible deficiencies in the drainage system*

2. Dwr Cymru Welsh Water originally objected to the site's designation because of concerns relating to deficiencies in the drainage system which it was seeking to

address. On the basis of the Council's submissions it appears that planning permission has already been granted for the development of the designated area and that Dwr Cymru Welsh Water has conditionally withdrawn its objection. An inspection of the area in March 2007 revealed that construction work on the site is well advanced.

*Whether the designated area should be expanded*

3. One objector suggests that the redevelopment area should be expanded to incorporate the former shipping berth for the Oil Wharf which lies immediately to the north-east of the designated area, another suggests that consideration should be given to utilising land slightly further along the coastline, at the furthest end of the nearby coach parking area. These sites are suggested as being suitable for the provision of slipway and boat moorings. As explained in my comments on the first issue above, I consider that the Plan's policies provide an adequate framework for the assessments of such schemes without the need to specifically identify sites suitable for such facilities.

**RECOMMENDATION**

**I recommend:**

**(REC.0402) that no modification be made to the DD in response to this objection.**

## SLATE QUAY, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
<b>B/760/49</b>	<b>CCW</b>		<b>269</b>
<b>B/844/21</b>	<b>CPRW</b>		<b>269</b>
<b>B/790/28</b>	<b>Gwynedd Archaeological Trust</b>		<b>269</b>
<b>B/1342/3</b>	<b>Mike Hart, Ffestiniog Railway Company</b>		<b>269</b>

### Notes

- Although Objection B/1342/3 was submitted on a form relating to Development Briefs, the Council has treated part of the representation as being a duly-made objection to the UDP and I have dealt with it accordingly.
- In addition to the representations listed above I have also taken into account objection B/790/14.

### Main Issues

- Whether the area should be designated as a Redevelopment Site.
- Whether the Redevelopment Site should be extended to include the track and temporary railway station of the Welsh Highland Railway.
- Whether the Redevelopment Site should be extended to include Coed Helen Park.
- The natural water channel that leads to the Slate Quay.

### Inspector's Considerations and Conclusions

*Whether the area should be designated as a Redevelopment Site*

1. This Redevelopment Site covers the estuary and part of the River Seiont and adjacent land, most of which is on the town side of the river. The site includes land designated as a Special Area of Conservation, a Site of Special Scientific Interest and a Conservation Area, is within a historical landscape registered as a Landscape of Exceptional Historic Interest and contains listed buildings. It also lies adjacent to the castle and the town walls, designated as a World Heritage Site, as well as other important historical buildings. Objectors raise concern that the particular sensitivity of the site, as reflected in these designations, is such that it is unsuitable for the large-scale redevelopment which would be likely to follow as the result of the Redevelopment Site designation. Objectors also rely on what are

portrayed as short-comings in the Development Brief for the site which are seen as serving to reinforce their concerns.

2. As the Council points out this area serves as one of the main routes into the town centre, linking the main road to the Slate Quay car park which lies in the shadow of the castle. Along this route there are land and buildings that detract from the quality of the environment because of their state of repair or the unsuitability of the nature of the buildings or the use of the premises. The cumulative effect of this falls short of the favourable first impression that would be expected of this important historic town. For this reason I consider the Plan's ambition of securing the redevelopment of this area to be soundly based as a means of improving the environmental quality of the area as well as providing the opportunity for social and economic benefits.

3. Concerns relating to the Development Brief are not a matter for me as the document does not form part of the Plan. I note that the Council has suggested that, in response to some of the matters raised by objectors, it intends to revise the brief prior to issuing a final version. It does not follow that the designation of this large tract of land for redevelopment would result in large-scale individual developments. Given the sensitivity of the site, statutory duties and the requirements of a raft of proposed UDP policies it will be necessary that any new development respects its context.

4. The designation provides an opportunity for a comprehensive approach to the development of the area, providing opportunities to consider the full range of considerations that dictate good quality urban design, including: landscaping to screen, where needed, the unsightly features that cannot be relocated; permeability to encourage pedestrian movement; and sensitive siting, scale and massing of buildings. Detailed concerns regarding, for instance, the setting and prominence of the castle, and the effect on the ecology of the area, are matters that would need to be taken on board in the overall design. The Council has referred to a master plan that has been the subject of public consultation and which has been prepared to guide the development of the area.

*Whether the Redevelopment Site should be extended to include the track and temporary railway station of the Welsh Highland Railway*

5. In response to an objection the Council explains that the temporary nature of the building does not provide adequate justification for including the site within the redevelopment area, and points to the extensive preparation work and public consultation that have been undertaken based on the present site.

6. I accept that, as the Council rightly points out, the exclusion of the land in question from the designated area does not prevent its redevelopment. However, it is not clear to me why this land has not been incorporated within the Redevelopment Site designation. As a small parcel of land sandwiched between the designated area and the Welsh Highland Railway line it would seem to be a natural part of the area's redevelopment. The temporary nature of the building means that it has the potential to fulfil a useful role in the area's redevelopment. Notwithstanding that a master plan has already been prepared for the area, it does not seem to me that the inclusion of this modest tract of land will jeopardise this work, but rather would address what appears to be an anomaly in the way the boundaries of the designation have been drawn. The Plan should be altered to

incorporate the land occupied by the railway station and its immediate surroundings. As the railway line forms a clear boundary to the area there is no need to include it within the designation.

*Whether the Redevelopment Site should be extended to include Coed Helen Park*

7. In order to improve pedestrian and cycle access to the nearby Coed Helen Park an objector considers that it would be beneficial to include the Park, or at least the entrance to it near Aber Bridge, within the Development Brief and any plans for the area's development. It seems to me that the extent of the designated redevelopment area is sufficient to enable the issue of access to this open land, which lies on the opposite side of the river to the town, to be properly addressed as part of the overall plan for the designated site.

*The natural water channel that leads to the Slate Quay*

8. The Council acknowledges the importance of protecting the river from harmful development and explains that such matters influenced the preparation of the master plan for the area. I am also mindful that careful consideration will need to be given to matters relating to flow of water within the estuary and the river in the context of any specific development proposals that may come forward at planning application stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0403) that the DD be modified by incorporating the railway station building and its immediate surroundings within the designated Redevelopment Site;**

**(REC.0404) that no other modification be made to the DD in response to these objections.**

**CILGWYN GRID REF 250250 354250**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA379

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/1480/2003	Mrs Margaret A Perry		196
B/1669/2003	Ramona Crocker		196
B/1362/2003	Mr SM Crocker		196
B/1315/2004	John Little		196
B/1396/2003	Dr Barry Kiehn		196
B/1394/2003	Mrs Mary Kiehn		196
B/1579/2003	Megan Rees		196
B/1436/2003	Anthony Hilton		196
B/1355/2003	Sandra Hilton		196
B/1665/2003	T Jackson		196
B/1548/2003	Melfyn V Spragg		196
B/1368/2003	Dafydd Herbert Errington		196
B/1425/2003	Gregory Johnston Keay		196
B/1380/2003	J Jones		196
B/1575/2003	Cara Whomsley & Adrian Walker		196
B/1600/2003	Steve Eggleston & Judith Francis		196
B/1411/2003	Emyr Roberts		196
B/1420/2003	Father Demetrius		196
B/1360/2003	Councillor Dilwyn Lloyd		196
B/1497/2003	Mr Roger A Perry		196
B/1365/2003	John Gruffudd Williams		196
B/1664/2003	Llifon Glyn Hughes		196
B/1663/2003	Frances G Stanford-Parker		196
B/1441/2003	R Powell & SM Lloyd		196



B/1393/2003	Louise Curd		196
B/1670/2003	Mr DF Good & Ms L Curd		196
B/1473/2003	Mr Paul Stevens		196
B/1474/2003	Mrs Linda Stevens		196
B/1428/2003	Mr Steve Hindle		196
B/1472/2003	William Richard Griffiths		196
B/1359/2003	Elfed Vaughan Roberts		196
B/1657/2003	John & Clare Curtis		196
B/1642/2003	Mr Anderson & Miss Anderson		196

### Unconditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1379/2003	Morris Jones		

### Main Issue

- Whether the site is appropriate as a waste management facility

### Inspector's Considerations and Conclusions

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that the interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations, and thus I am unable to reach a view on the merits of designating this particular site. The significant public reaction to the proposed allocation of this site is evidence that the public consultation short-comings that I have identified have not proven to be a much of a problem as is likely to have been the case with most of the sites. This does not affect my findings that the public consultation exercise has been inadequate. The proposed modifications procedure will provide a mechanism for full public consultation, and this will enable a properly informed decision to be made on the matter.

2. The position regarding waste disposal through landfill/land raise in the short to medium term within the northern part of Gwynedd has been a matter that has been evolving concurrently with the UDP inquiry. It is hoped that matters will be clearer by the time the Council prepares its proposed modifications to the plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0405) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal public consultation on its allocation;**

**(REC.0406) that no other modification be made to the DD in response to these objections and, in particular, that NA 379 be not accepted.**

**CAE PENFFRIDD, DEINIOLEN & CLWT Y BONT**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA274

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/550/1</b>	<b>Mrs Carys Griffiths</b>		

**FERODO GRID REF 249650 365250**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA380

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/228/2012</b>	<b>Y Felinheli Community Council</b>		<b>196</b>

**Main Issue**

- Whether the site is appropriate as a waste management facility

**Inspector's Considerations and Conclusions**

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations. Indeed the objection to this site is based on the lack of information regarding the type of waste facility envisaged by the Plan. Thus, I am unable to reach a view on the merits of designating this particular site. The proposed modifications procedure will provide a mechanism for full public consultation, and this will enable a properly informed decision to be made on this matter.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0407) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal public consultation on its allocation;**

**(REC.0408) that no other modification be made to the DD in response to these objections and, in particular, that NA 380 be not accepted.**

## FFERM BRYN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA381

This Section is subject to Further Proposed Changes Nos: NAP31

### Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/228/2013		Y Felinheli Community Council		641

#### Note

- I have dealt with NAP 31 in the section of my report on Policy C21.

#### Main Issue

- Whether the site is appropriate as a waste management facility

### Inspector's Considerations and Conclusions

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations. Indeed the objection to this site is based on the lack of information regarding the type of waste facility envisaged by the Plan. Thus, I am unable to reach a view on the merits of designating this particular site.

2. Since the site was identified in the Pre-inquiry Proposed Change version the Council explains that a further assessment of the site and progress in identifying Pen-Hesgyn as fulfilling the envisaged composting role means that the site is not considered to be suitable for such allocation. NAP 31 proposes to exclude the site from the list of waste management facilities. This has not been the subject of public consultation and in the absence of compelling evidence that the site is unsuitable or not needed as a composting site I am unable to comment on the merits of the Further Proposed Change.

3. The proposed modifications procedure will provide an opportunity for public consultation on the Council's intention to withdraw the site as a potential waste management facility, enabling a properly informed decision to be reached.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0409) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal public consultation on its allocation;**

**(REC.0410) that no other modification be made to the DD in response to these objections and, in particular, that NA 381 be not accepted.**

## GLYN RHONWY/COED DOCTOR, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1318/1	Mr & Mrs S Hughes		366
B/1317/1	D Roberts		366
B/1314/1	Mrs G Stott		366
B/303/1	Mrs Ann Roberts		366
B/1329/1	Pete Frost		366
B/760/57	CCW		366
B/1323/1	Malcolm & Deborah Burns		366
B/914/1	Llyr Jones		366
B/676/1	Medwyn Iloyd Roberts		366

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1322/1	Mrs M Jones		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/977/1	Snowdonia Gateway Ltd	H Jones	

### Note

- Although several of the representations referred to above have been made on forms relating to the Development Brief for the site, the Council has treated them as duly made objections to the UDP. Insofar as the comments are relevant to the UDP I have taken them into account in my consideration of this matter.

### Main Issues

- The potential landscape impact of the site's designation.
- The potential traffic impact of the site's designation.
- Limiting part of the site to uses falling within Use Class B1.
- The Coed Doctor area.

## **Introduction**

1. The area of land identified as a Redevelopment Site lies immediately to the north-west of Llanberis, between the A4086 and Clegyr Road. It comprises a derelict slate quarry, a former Second World War bomb store and woodland. The land has been the subject of a recent land reclamation programme.
2. On the basis of the draft Development Brief for the site and The Invitation of Statements of Interest from Developers that have been prepared by the Council, copies of which are appended to its Proof of Evidence, it is evident that the site is envisaged to provide 'high quality' and 'sustainable' employment opportunities. As an aside I note that the area defined in the Invitation of Statements of Interest identifies a site as being more than twice that shown in the draft Development Brief and on Inset Map 28 of the UDP. Under Policy D1 of the Deposit Draft version of the Plan 3.73ha of land at Glyn Rhonwy is earmarked solely for high quality employment sites falling within use class B1. The precise location of the 3.73ha within the much larger area designated as a Redevelopment Site (56.55ha) is not identified in the plan or the Council's submissions to the Inquiry, although the Development Brief explains that it is around an existing industrial site operated by Euro/DPC. NA 200 introduces changes to the Policy to provide greater flexibility in terms of the types of uses that would be acceptable by permitting, in addition to Class B1 uses, other uses which would support the needs of employees on the site, and also inserts "Part of" before "Glyn Rhonwy" in the list of sites. A Further Proposed Change, NAP 114, has also been introduced which excludes the site from the list of sites set out in Policy D1.
3. In its Proof of Evidence the Council explains that it has shortlisted 2 declarations of interest for the site's development: one is a mountain biking centre and business cluster, the other is a multi-purpose leisure development.
4. The Plan does not give an indication of the nature or scale of the development that would be acceptable within the site and the draft Development Brief adds little significant detail in this respect. The Plan treats this Redevelopment Site, which lies outside the Development Boundary of Llanberis, in the same way as it has approached those Redevelopment Sites that lie within a Development Boundary. In my view this is inappropriate. Unlike in the case of sites that lie within settlements, both national planning policy and the UDP are generally restrictive in relation to development in the countryside.
5. The allocation of a site of this size as a Redevelopment Site for an unspecified scale or nature of development, does not sit comfortably within this planning framework. It seems to me that the Council may have a clearer picture of the type of redevelopment schemes that it would be willing to accept and that this may be reflected in the nature of the declarations of interest that it has shortlisted. Nevertheless, this needs to be made clearer within the Plan. Paragraph 2.8 of Unitary Development Plan Wales, 2001, informs that site specific proposals provide a positive lead for development, and help create certainty for developers and the local community. In this case, the absence of detail means that the allocation lacks adequate certainty. Whilst flexibility is another important attribute for a Plan, I consider that the lack of direction on the type and scale of activity that would be acceptable on this site causes significant problems.



6. It seems to me that it would be difficult to reconcile Plan policies that seek to safeguard interests of acknowledged importance, for instance landscape protection, with an allocation that envisages the redevelopment of this site for an unspecified purpose. Furthermore, given the changes to the Plan that affect the site and which have been carried out since the DD was published, it seems that the Council does not have a clear picture of the type of development that it would wish to see on the site.

7. The apparently open-ended approach to the site's development may have prejudiced interested parties commenting on the DD – a more focused approach to the site's development potential in the DD may have elicited a greater response from the public. There are fundamental considerations relating to how this site should be developed which means that it is a matter that should be addressed by the Plan rather than only through a Development Brief.

### **Inspector's Considerations and Conclusions**

*Is the site's designation as a Redevelopment Site appropriate in light of the potential impact on the landscape*

8. As an objector points out the site lies in proximity to the National Park and to a Landscape Conservation Area, and the site has a historical significance within the local landscape. In relation to the mountainous terrain that lies nearby the land is low lying and, thus, is overlooked from the higher ground much of which is popular with walkers and cyclists. Despite the previous industrial activity parts of the site are assimilating into the natural landscape as vegetation becomes re-established. I share the objector's concerns regarding the potential visual impact of the development of a site of this size.

9. I am mindful that the nature of any visual impact that would arise from the site's redevelopment would depend on the details of any scheme – density, siting and external materials together with landscaping will all be important considerations. However, it seems to me that there is a need for the Plan to set parameters for any development of the site, such as defining areas suitable for the erection of buildings, the total floorspace of any buildings, as well as the broad range of uses likely to be acceptable. This would enable any potential developer to appreciate the likely scale and nature of development that can be accommodated on the site. This additional information should be incorporated within the proposed modifications, thereby enabling full public consultation.

*Is the site's designation as a Redevelopment Site appropriate in light of the potential traffic impact*

10. An objector raises concerns regarding the impact of additional traffic flows that would arise from the site's development, which may harm local accessibility and give rise to the need to improve the highway network, particularly to the south towards the A5 at Capel Curig through Pen y Pass. Although the site has direct access onto the A4086, its overall size means that the potential traffic volumes that could be attracted could have a very significant effect on the local highway network. Neither the Plan nor the Development Brief provides clear parameters in terms of the type or scale of development that would be permitted on this 56.55ha site, other than to suggest that the Coed Doctor area should be protected and recognising that part of the area has already been developed by Euro/DPC. For the

same reasons as I give in relation to the first issue, I consider it necessary that the Plan provides greater detail on the envisaged redevelopment and that this is considered at the proposed modifications stage.

*Whether part of the site should be limited only to uses falling within Use Class B1*

11. It is evident that the Council considers that the particular attributes of this reclaimed land means that it offers an opportunity for a high quality development. The purpose of denoting an area of 3.73ha within the overall site for use class B1 only is not clear to me, especially as it may prohibit ventures linked to the leisure and tourism industry which the Council identifies as possible uses in its Development Brief. The broadening of the type of uses that would be permitted by Policy D1, as proposed by NA 200, would not significantly alter the situation. The Council's Business Support Manager has objected to the B1 restriction, and it appears that this consideration led to the Council proposing NAP 114.

12. For reasons I have already set out above I consider that the Plan should include further detail on the nature of any redevelopment of this site. However, on the basis of the information currently before me, I consider that restricting part of the site only to B1 uses would be unnecessarily restrictive as it would prevent some tourist/recreational activities that may be appropriate on the site.

*Should the Coed Doctor area be excluded from the Redevelopment Site designation*

13. It is evident that local residents value the Coed Doctor area as an informal recreation area which is easily accessible from the village and has a species-rich ecology. The Council acknowledges its importance in this respect through its designation as a local nature reserve. The area is also an Ancient Woodland and, on the basis of the Council Proof of Evidence, it may also contain trees protected by a preservation order. Nevertheless the Council does not consider that the site should be excluded from the Redevelopment Site designation, but accepts that matters of biodiversity and public resource should be given greater attention in the Development Brief.

14. I acknowledge that the proposed new policy introduced by NA 142 to deal with redevelopment sites requires that schemes conform to the Development Brief and/or Masterplan agreed by the Council. However, the new policy's explanatory text informs that such sites are intended to provide opportunities to make effective use of previously developed sites or sites that are not being fully utilised. Opportunities for a range of uses are identified in the new policy. In relation to previously developed land, an objector contends that the designation of the Coed Doctor area conflicts with Policy C3 of the Plan given the area's ecological and environmental heritage value and its role as an important open space. It is also argued that as the remains of previous activities and structures on the land have blended into the landscape that the site does not fall within the Government's definition of previously developed land. The draft Development Brief, which deals with the whole of the designated Redevelopment Site, informs that any development should not have a negative impact on Coed Doctor as it is an important informal leisure site for local residents.

15. I am in no doubt that the most effective means of providing an appropriate level of protection to the Coed Doctor area would be to exclude it from the redevelopment designation rather than by incorporating protection measures

within a development brief which does not enjoy the same status as the development plan.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0411) that the DD be modified by the introduction of a rigorous definition of the scope of anticipated development within the site;**

**(REC.0412) that the DD be modified by amending the Inset map to exclude the Coed Doctor area from the Redevelopment Area;**

**(REC.0413) that no other modification be made to the DD in response to these objections.**

**COOKES, PENRHYNDEUDRAETH GRID REF 261700 338800**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA387

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection No</b>	<b>Ref</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1034/2022</b>		<b>National Trust Wales</b>		<b>196</b>

**Main Issue**

- Whether the site is appropriate as a waste management facility

**Inspector's Considerations and Conclusions**

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations, and thus I am unable to reach a view on the merits of designating this particular site. The proposed modifications procedure will provide a mechanism for full public consultation, and this will enable a properly informed decision to be made on the matter.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0414) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal public consultation on its allocation;**

**(REC.0415) that no other modification be made to the DD in response to these objections and, in particular, that NA 387 be not accepted.**

**PENYGROES INDUSTRIAL ESTATE GRID REF 246900 352500**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA305

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/551/2008</b>	<b>Llanllyfni Community Council</b>		<b>553</b>

**Main Issue**

- Whether the site is appropriate as a waste management facility

**Inspector's Considerations and Conclusions**

1. Although the identification of this site was made as part of the Pre-inquiry Proposed Changes to the Plan, which was subject to full public consultation, no details of the envisaged use or the extent of the site were provided. The former detail was subsequently set out in Further Proposed Change NAP 31 but this has not been the subject of a formal public consultation exercise; no elaboration on the latter detail has been forthcoming. For reasons I detail in the section of the report dealing with Policy C21 I consider that the absence of these details means that the interested parties have not been given an adequate opportunity to comment on any of the proposed waste management site allocations. Indeed the objection is partly based on the lack of information regarding the type of waste facility that is envisaged. Thus I am unable to reach a view on the merits of designating this particular site. The proposed modifications procedure will provide a mechanism for full public consultation, and this will enable a properly informed decision to be made on this matter.

2. The objector also considers that the site ought to be utilised as an extension to the existing industrial units. However, I note that on the basis of a survey of employment land commissioned by the Council there is no need for additional employment land in the relevant Dependency Catchment Area. On the basis of the available information I consider that this element of the objection does not justify excluding the site as a potential waste management facility.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0416) that the DD be modified by the identification of the envisaged boundaries of this site and that the Council undertakes a formal public consultation on its allocation;**

**(REC.0417) that no other modification be made to the DD in response to these objections and, in particular, that NA 305 be not accepted.**

## GELERT FARM WORKS, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA356

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/985/13	Welsh Highland Railway Ltd	Graham Farr	482
B/985/8	Welsh Highland Railway	Graham Farr	482
B/1342/1	Mike Hart Ffestiniog Railway Company		482
B/985/14	Welsh Highland Railway Ltd	Graham Farr	482

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/985/2015	Welsh Highland Railway Ltd	Graham Farr	482

### Notes

- Since the preparation of the skeleton report by the Council as set out above it has confirmed that objection B/985/8 has been unconditionally withdrawn and objections B/985/13 & 14 have been conditionally withdrawn.
- Although Objection B/1342/1 was submitted on a form relating to Development Briefs, the Council has treated part of the representation as being a duly-made objection to the UDP and I have dealt with it accordingly.

### Main Issue

- The expansion of the Redevelopment Site and revision of the development limit boundary.

### Inspector's Considerations and Conclusions

1. The DD identifies the main group of buildings and structures that serve the narrow gauge railway as a Redevelopment Site. In response to objections, the Council proposed NA 356 which provides for a westwards expansion of this designation to include a parcel of land that lies between the development limit to the north and the Cambrian Coast railway line to the south. The addition of this area covered only part of the area sought for inclusion by the objectors, other tracts of nearby land are:

- (i) a strip of land extending westwards from the area identified in NA 356 which would include the Welsh Highland Railway station and would extend as far as the main road (A487);
- (ii) a narrow strip of land that runs along the southern side of the Cambrian Coast railway line and which abuts an area designated as public open space in Plan;
- (iii) a tapering parcel of land that lies between the originally designated Redevelopment Site and a path which the Plan identifies as the development limits and a protected railway line;
- (iv) a small tract of land that extends north-eastwards along the line of the Welsh Highland Railway.

2. The objectors advise that these sites lie within the ownership of either the Welsh Highland Railway Ltd or the Ffestiniog Railway Company and that they are considered to form important components of the land which is available to facilitate the redevelopment of the area. A scheme is envisaged that would take advantage of the site's location in terms of creating a railway terminus that could provide a link between the Welsh Highland Railway, the Ffestiniog Railway and the national rail network, as well as improving pedestrian links to the town including bus stops and car parks. The scheme would not only provide a public transport benefit but would also create opportunities for the development of tourist and educational facilities.

3. The Council has not explained its decision to exclude these tracts of land from the redevelopment area. Given that the tract of land described in (iv) above extends into countryside from the built up area of the town I agree with the Council that this area should not be included within the redevelopment area. In reaching this view I have noted the unconditional withdrawal of an objection relating to the Development Boundary as it affects this area. Bearing in mind the relationship of the remaining sites to the local rail network, their physical state and their relationship to the existing built form I see no reason to exclude any one of them from designation as a Redevelopment Site, despite the decision of one objector to conditionally withdraw its objections. It seems to me that the inclusion of these areas would maximise the flexibility in terms of site configuration which may assist in securing the area's redevelopment. If it is subsequently established that all or part of this additional land is not required this can be taken into account in determining any future planning applications on these sites.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0418) that the DD be modified by the acceptance of NA 356;**

**(REC.0419) that the DD be modified by extending the Redevelopment Site to incorporate the sites listed (i) to (iii) above, the boundaries of which are shown on the map accompanying objection B/985/13 and 14;**

**(REC.0420) that no other modification be made to the DD in response to these objections.**



## CO-OP FOODSTORE, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/995/1	The Co-operative Group	Caroline Simpson	486

### Main Issue

- Whether the Co-op Foodstore in Porthmadog should be identified as a redevelopment site

### Inspector's Considerations and Conclusions

1. The Co-op foodstore operator site explains that retailing patterns have altered substantially in recent years following the opening of a Tesco supermarket (the Co-op store has subsequently closed). It is suggested that the Plan should allocate the site as a Redevelopment Site under Policy C3 (re-using previously developed land) as it is appropriate for a range of uses. I have borne in mind that since this representation was made, the Council has produced the Pre-inquiry Proposed Change version of the Plan which clarifies the way redevelopment sites are dealt with by introducing a New Policy which deals specifically with Redevelopment Sites. It seems to me that the redevelopment of this site does not raise any issues that are not adequately covered by a raft of policies within the Plan, such as C3 which has been identified by the objector. There seems to me to be no benefit in identifying the site as a Redevelopment Site.

### RECOMMENDATION

I recommend:

**(REC.0421) that no modification be made to the DD in response to this objection.**

Since the preparation of the Skeleton Report it has emerged that an objection by the CPRW on the basis of a site's omission from those designated for redevelopment had not been recorded on the Council's database. This error has subsequently been addressed and I have added the following reporting cell to deal with the matter.

## OLD SMITHY SITE, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/98	CPRW		652

### Main Issue

- Designation of the Old Smithy site in Pwllheli as a redevelopment site.

### Inspector's Considerations and Conclusions

1. On the basis of the Council's response it is evident that since this objection was made planning permission to use the site as a car park has been granted and implemented. As there is no reason to believe that this site will become available for redevelopment in the foreseeable future I consider that it is not appropriate to identify it as a redevelopment site.

### RECOMMENDATION

I recommend:

**(REC.0422) that no modification be made to the DD in response to this objection.**

## TY GLANDWR REDEVELOPMENT SITE, TREFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA339

This Section is subject to Further Proposed Changes Nos: NAP113

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/673/3	Llanaelhaearn Community Council		567

### Main Issue

- Whether the boundaries of the Redevelopment Site should be amended.

### Inspector's Considerations and Conclusions

1. The Council explains that, following discussions with the owner of part of the site originally identified as a Redevelopment Site, it has decided to alter the Plan to exclude an area that may be unavailable for redevelopment. NA 339 proposes the exclusion of Ty Glandwr from the designated area. For the same reason, it proposes NAP 113 which suggests the exclusion of most of the remaining western half of the site from the designation.

2. Based on the objector's formal submission to the Council it seems that it considers it unlikely that the bus depot that presently occupies most of the site would be able to relocate and concludes that there is no intention to redevelop the site "which includes Glandwr site" (translated from Welsh).

3. In considering the extent of any area to be ear-marked as a Redevelopment Site in the Plan the willingness or otherwise of any landowner to agree to such a scheme at the time of plan-preparation does not seem to me to be an overriding consideration. Clearly, in pursuing the redevelopment of such a site there would be a need to involve all those with a legal interest, but at this stage an owner's intention should not in itself dictate the extent of any site, not least given that the identity of land owners and their ambitions could change over the Plan period. In this case, based on the Development Brief, it appears that the originally designated site was identified because it provided an opportunity for the environmental improvement of a site which affects the setting of a Conservation Area as well as providing an opportunity to avoid environmental problems associated with the flow of heavy vehicles to and from the site. The western part of the site assumes particular importance in terms of the appearance of the village because of its prominent street frontage location and proximity to the Conservation Area.

4. There is no substantive evidence to suggest that there is no reasonable prospect of this part of the site being redeveloped - the Council's submission describes the situation as the "owner is possibly not agreeable to the principle of including the property within the redevelopment area". In the circumstances I

consider that it ought to be retained within the designated area, thereby maximising the flexibility of the site to accommodate new development. The inclusion of the whole of the site within the designated area would not prevent consideration of a planning application for the development of part of the site, which would have to be determined in light of the circumstances at that time.

## **RECOMMENDATION**

**I recommend:**

**(REC.0423) that no modification be made to the DD in response to this objection and, in particular, that NA 339 and NAP 113 be not accepted.**

## OLD SLATE TIPS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/46	CCW		635

### Note

- The above objection relates to the general approach to old slate tips rather than a site specific concern. It is therefore dealt with in the section of the report on Policy C14.

**OBJECTIONS TO CHAPTER 'CH'**

## INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA145; NA146; NA147; NA148; NA149; NA150; NA151

This Section is subject to Further Proposed Changes Nos: NAP8; NAP45; NAP52

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/866/24	Snowdonia National Park Authority		RTS Housing
B/866/27	Snowdonia National Park Authority		534
B/244/4	Steve Eaves		534
B/756/43	Environment Watch Wales & the Borders		147
B/867/18	House Builders Federation		RTS Housing
B/867/19	House Builders Federation		RTS Housing
B/867/20	House Builders Federation		RTS Housing
B/867/21	House Builders Federation		RTS Housing
B/952/22	RCH Douglas Pennant	Guy D Evans, Carter Jonas	534
B/952/15	RCH Douglas Pennant	Guy D Evans, Carter Jonas	534
B/959/3	Mr K Salisbury	CDN Planning	534
B/952/10	RCH Douglas Pennant	Guy D Evans, Carter Jonas	534
B/960/5	Mrs Lowri Williams	Charles F Jones & Son	534
B/930/4	Dishland Ltd	Derek Prosser, Derek Prosser Associates	RTS
B/866/25	Snowdonia National Park Authority		RTS Housing
B/867/22	House Builders Federation		534
B/866/26	Snowdonia National Park Authority		RTS
B/666/1	Buan Community Council		534
B/235/1	Kenneth Williams		340
B/983/4	Headland Promotions	Emery Planning Partnership	RTS

B/1032/5	Mrs C Jones		RTS
B/999/9	Rossisle Development Ltd	M Gilbert (The Planning Consultancy)	RTS Housing
B/317/1	Bangor Civic Society		534
B/317/3	Bangor Civic Society		534
B/699/1	Vernon Oldfield		534
B/793/3	Michael Parry		RTS Housing
B/731/8	Iwan Rhys Edgar		534
B/801/6	Welsh Agricultural Union		38
B/756/13	Environment Watch Wales & the Borders		114
B/1218/1	Llandwrog Community Council		341

#### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/994/3	Bennet Homes Ltd	Jan Tyrer	RTS Housing
B/939/1	Dr & Mrs HM Davies	Berwyn Owen, Owen Davenport Ltd	477
B/911/11	Welsh Development Agency		RTS
B/734/118	Welsh Assembly Government		339
B/734/116	Welsh Assembly Government		336
B/734/117	Welsh Assembly Government		336
B/734/115	Welsh Assembly Government		334
B/734/119	Welsh Assembly Government		308
B/734/120	Welsh Assembly Government		309

#### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/113	Welsh Assembly Government		
B/734/121	Welsh Assembly Government		
B/734/114	Welsh Assembly Government		



**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/783/15	Welsh Language Board		
B/783/14	Welsh Language Board		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of objector	Agent	Response Ref
B/756/2099	Environment Watch Wales & the Borders		157
B/844/2078	CPRW		534
B/867/2031	House Builders Federation		RTS Housing

**Notes**

- The following objections are dealt with in the section of this report which relates to Policy CH1: B/866/27, B/244/4, B/867/22, B/844/2078, B/756/43, B/235/1, B/801/6, B/866/24, B/867/18, B/867/19, B/867/21, B/866/25, B/866/26, B/983/4, B/1032/5, B/999/9, B/793/3, B/911/11, B/867/2031.
- Objection B/756/13 is responded to in LPA proof 115, not 114.
- Objection B/952/22 is dealt with in the section of this report which relates to the proposed housing allocations at Craig y Pandy and Waun Pandy, Tregarth.
- Objection B/952/15 is dealt with in the section of this report which relates to the settlement status of Llandygai.
- Objection B/952/10 is dealt with in the section of this report which relates to the settlement status of Talybont.
- Objection B/960/5 is dealt with in the section of this report which relates to the Development Boundary of Mynytho.
- Objection B/666/1 is dealt with in the section of this report which relates to the settlement status of Boduan.
- Objections B/317/1 and B/317/2 are dealt with in the section of this report which relates to Policy CH1 and also in the sections that relate to each of the proposed housing land allocations.
- Objection B/699/1 is dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text' and in the sections which relate to the status of settlements.
- Objections B/1218/1, B/867/20 and B/731/8 are dealt with in the sections of this report which relate to Policy CH1 and 'Affordable Housing for Local Need Text'.
- Objection B/756/13 is dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text'.
- Objection B/939/1 is dealt with in the section of this report which relates to the settlement status of Llwynhudol.
- Objection B/930/4 is dealt with in the section of this report which relates to the omission of housing allocations in Dolgellau/Abermaw DCA.

## Main Issues

- The maintenance of an adequate supply of housing land.
- The phased development of the proposed housing land allocations.
- The control of housing development in the countryside.
- The role of private investment.
- The importance of infrastructure provision.
- The consistency of the Welsh and English text.

## Inspector's Considerations and Conclusions

### *The maintenance of an adequate supply of housing land*

1. PPW (paragraph 9.2.3) advises that, in preparing their development plans, LPAs must ensure that sufficient land is genuinely available or will become available, to provide a 5 year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. An objector argues that the plan should contain a policy which ensures that this level of provision is maintained. The LPA agrees and, via NA 191, proposes to introduce this. I conclude that the proposed policy, and the reference in the supporting text to the use of a plan review to remedy deficiencies of supply that arise, will provide the necessary clear commitment to keep this vital matter under review.

### *The phased development of the proposed housing land allocations*

2. DD paragraph 5.2.3, in support of policy CH1, expresses the intention to phase the release of the larger housing allocations. An objector notes that this is not reflected in the policy itself. The LPA agrees that, because this is a matter relating to the control of development, it should be expressed within the policy. It proposes, via NA 153, to amend policy CH1 to provide that the housing land allocations so specified on the proposals map will be developed in phases. I conclude that this will bring the plan into conformity with the advice of 'Unitary Development Plans – Wales' (paragraph 2.14) that it is only the policies of the development plan that have special status in deciding planning applications.

### *The control of housing development in the countryside*

3. DD paragraph 5.1.25 advises that the remainder of the plan area (i.e. the part outside the Development Boundaries) will be considered as open countryside. New housing will not be permitted in those areas unless there is a genuine agricultural need. An objector argues that this is too restrictive and, in particular, that areas of previously developed land should be given priority for development wherever they are.

4. PPW (paragraph 9.2.21) advises that UDPs should include a policy to resist new housing in the countryside away from settlements or other areas allocated for development. Paragraph 9.3.6 advises that isolated new homes in the open countryside require special justification. Dwellings for farm and forestry workers are given as examples. It is clear, therefore, that dwellings to meet other needs would be acceptable so long as a special justification can be demonstrated. In recognition of this the LPA proposes NA 149 which secures that new housing in the

countryside will be strictly controlled and that a special justification will be required for this. I conclude that this brings the paragraph into conformity with PPW advice. As regards previously developed land, PPW (paragraph 2.7.1) advises that not all such sites are suitable for development. One factor to be taken into account is its location. Policy C3 of the DD deals specifically with re-using previously developed sites. The use of Development Boundaries provides a clear and consistent basis for decision making on this aspect.

*The role of private investment*

5. Paragraph 5.1.17, as introduced by NA145, informs that when deciding how to distribute the forecast housing requirement between the DCAs, the LPA had regard among other things to the potential of localities to attract investment. An objector argues that it is not a planning function to build houses to attract investment. It is, however, clear from the proposed text of the plan that this is not the intention of the LPA. Instead, it is giving consideration to the scope for private sector investment to deliver the houses themselves. This is in complete conformity with the advice of PPW, which envisages that the private sector will provide not only dwellings to meet market needs but also, in specified areas, dwellings for occupation as affordable housing. I conclude that the plan text should not be modified in response to this objection.

*The importance of infrastructure provision*

6. An objector argues that the UDP should, among other things, seek to promote development in areas where the necessary infrastructure already exists or, if there is a deficiency, in areas where this can be adequately remedied. The LPA agrees and proposes to secure the introduction of this objective via NA 151. I conclude that, in conforming to policy CH16, this will promote the internal consistency of the plan.

*The consistency of the Welsh and English text*

7. An objector notes that, within paragraph 5.1.28 of the Welsh version of the DD, the word 'brifion' should be 'gyflenwadau' if it is to maintain consistency with the English text. The LPA agrees and proposes to secure this via NA 150. I conclude that this will improve the internal consistency of the plan.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0424) that the DD be modified by the acceptance of NA 149;**

**(REC.0425) that the DD be modified by the acceptance of NA 150;**

**(REC.0426) that the DD be modified by the acceptance of NA 151;**

**(REC.0427) that the DD be modified by the acceptance of NA 153;**

**(REC.0428) that the DD be modified by the acceptance of NA 191;**

**(REC.0429) that no other modification be made to the DD in response to these objections.**

## HOUSING - INTRODUCTION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA152

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/783/4	Welsh Language Board		279

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/122	Welsh Assembly Government		279
B/734/123	Welsh Assembly Government		279

### Supporters of Pre-Inquiry Proposed Changes

Ref No	Name of Supporter	Agent	Response Ref
B/773/2048	Chris Wynne (North Wales Wildlife Trust)		

### Main Issues

- The relevance of Linguistic Impact Assessment to individual policies.
- The relationship between key policy considerations.

### Inspector's Considerations and Conclusions

#### *The relevance of Linguistic Impact Assessment to individual policies*

1. The table in DD paragraph 5.2.1 states that Policy A2 (Linguistic Impact Assessment) is a key policy consideration in relation to the use of Policies CH1, CH2, CH5 and CH8. An objector argues that such an assessment should be required when all of the policies between CH1 and CH15 are applied.

2. Policy A2 provides that proposals which, because of their size, scale or location, have an unacceptable impact on the social, linguistic or cultural cohesion of communities, will be refused. The supporting text, (paragraph 2.2.7) clarifies that the assessment would be required at planning application stage. However, the preceding paragraph, 2.2.6, explains that the Welsh language has been a basic consideration in all Plan proposals. Thus it is not necessary to make the cross-reference to Policy CH1 because the relevant sites have been allocated for housing development only after regard has been had, among other things, to the impact of

their development on individual settlements. For this reason I agree with the LPA that the cross-reference between Policy A2 and Policy CH1 should be deleted by NA 152.

3. Policy A2 is intended to relate to proposed developments of a significant size. The number of dwellings arising from Policy CH4 (new dwellings in rural villages), Policy CH6 (rural exception sites), Policy CH7 (new dwellings in the open countryside), Policies CH9 and CH10 (conversion of buildings for residential use), Policy CH11 (demolition and reconstruction of dwellings), Policy CH12 (conversion of dwellings), Policy CH13 (conversion of the floors above shops), Policy CH15 (permanent occupation of caravans, chalets and cabins) are likely to be very small in each individual scheme. A cross-reference to Policy A2, is not, therefore, appropriate in respect of these policies.

4. The LPA, via NA 155, proposes to delete the word 'in-fill' from Policy CH3. This would leave the policy in a form in which it would apply to all proposals to build dwellings on undesignated sites of any size within Local Centres and Villages. Large scale schemes could therefore, in theory, arise in such places. A cross-reference to Policy A2 is, therefore appropriate.

*The relationship between key policy considerations*

5. An objector argues that, because Policies CH3, CH4 and CH6 provide for development proposals to be approved in certain circumstances, it is necessary to make a cross reference to Policy B22 (Impact on Amenities). In the interests of comprehensibility I agree with the LPA that this should be done. The LPA proposes to achieve this via NA 152.

## **RECOMMENDATIONS**

### **I recommend:**

**(REC.0430) that the table in DD paragraph 5.2.1 be modified by the deletion of the cross reference between Policy A2 and Policy CH1 in accordance with NA 152;**

**(REC.0431) that the table in DD paragraph 5.2.1 be modified by the insertion of the cross reference between Policy B22 and Policies CH3 and CH6 in accordance with NA 152;**

**(REC.0432) that the table in DD paragraph 5.2.1 be modified by the insertion of a cross reference between Policy A2 and Policy CH3;**

**(REC.0433) that no other modification be made to the DD in response to these objections.**

## HOUSING IN GENERAL IN GWYNEDD

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/731/14	Iwan Rhys Edgar		611
B/731/7	Iwan Rhys Edgar		611
B/713/1	Michael Jones		294
B/766/3	Plaid Cymru		611
B/731/11	Iwan Rhys Edgar		611

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/250/5	Pentir Community Council		

### Notes

- Objection B/713/1 is responded to in LPA proof 268 not 294 and is dealt with in the section of this report which relates to the Development Boundary of Penisarwaun.
- Objections B/731/7, B/766/3 and B/731/11 are dealt with in the section of this report which relates to Policy CH1.
- Objection B/731/14 is dealt with in the section of this report which relates to Policy B32.

## DEVELOPMENT BOUNDARIES IN GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/5	Aberdaron Community Council		610

### Main Issue

- Whether the DD is appropriate, having regard to the definition of Development Boundaries.

### Inspector's Considerations and Conclusions

1. The DD (paragraph 1.3.46) informs that Development Boundaries have been designated for the towns and villages of the plan area. Their purpose is to restrict development to sites that are within settlements so as to regulate development and protect the countryside. An objector argues that planning applications should be assessed on their individual merits without reference to such a policy device.

2. PPW (paragraphs 2.3.2, 2.5.3 and 2.5.7) advises that planning policies should promote resource-efficient settlement patterns that minimise land take and urban sprawl. Major generators of travel demand should be located primarily within urban areas. Development in the countryside should be located within and adjoining settlements where it can best be accommodated in terms of various stated criteria. In order that the UDP can conform to this advice it is necessary for it to define which areas are within and which lie outside of settlements. Development Boundaries do this and secure a clear basis for consistent decision making. For these reasons I conclude that they should remain as a key aspect of the UDP.

### RECOMMENDATION

I recommend:

**(REC.0434) that no modification be made to the DD in response to this objection.**



**POLICY CH1 – NEW HOUSES ON DESIGNATED SITES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA153

This Section is subject to Further Proposed Changes Nos: NAP89

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/288/1	Andrew Foskett		506
B/783/4	Welsh Language Board		279
B/915/1	WWF Cymru		343
B/756/44	Environment Watch Wales and the Borders		148
B/871/3	Robyns Owen		118
B/756/45	Environment Watch Wales and the Borders		149
B/678/3	Tywyn City Council		RTS
B/839/4	Sally Miles	RPS Planning	430
B/952/20	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	506
B/952/24	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	83
B/952/16	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	506
B/952/11	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	506
B/952/8	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	506
B/1032/6	Mrs C Jones	John Alun Jones	RTS
B/152/3	David Cooper		506
B/928/3	Mrs M Jones	Guy D Evans, Carter Jonas	RTS
B/983/5	Headland Promotions	Emery Planning Partnership	506
B/952/3	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	506
B/980/1	Robin Jones	Gareth J White	506
B/981/1	Mrs M Davies	Gareth J White	506
B/979/1	Robert F Jones	Gareth J White	506
B/965/6	Watkin Jones	Dalton Warner Davis	506
B/243/1	I Thomas		370

B/986/3	Lawson Stebbing & Co Ltd	Andrew Piatt/Alex McGibbon, Halliwels LLP	506
B/76/29	Mike Webb (RSPB)		358
B/959/4	Mr K Salisbury CDN Planning		9
B/965/4	Watkin Jones	Dalton Warner Davis	506
B/768/5	Gareth Dobson		506
B/330/1	Phil Wheeler		506
B/952/33	RCH Douglas Pennant	Guy D. Evans, Carter Jonas	83
B/1004/3	Joanna Thomas		506
B/935/4	Mr & Mrs A Davies		506
B/1031/3	Mr Nigel Williams	SG Williams & Associates	118
B/999/4	Rossisle Development Ltd	M Gilbert, The Planning Consultancy	178

#### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/126	Welsh Assembly Government		344
B/734/125	Welsh Assembly Government		344
B/734/124	Welsh Assembly Government		344

#### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/127	Welsh Assembly Government		

#### Supporters of Deposit Draft

Ref. No	Name of Supporter	Agent	Response Ref.
B/981/4	Mrs M Davies	Gareth J White	
B/322/3	Morbaine Ltd		
B/311/3	T.M. Wheldon-Williams		
B/355/1	Bruce Edwards		
B/767/11	Friends of the earth (Mon & Gwynedd)		
B/322/3	Morbaine Ltd		

<b>B/311/3</b>	<b>T.M. Wheldon-Williams</b>		
<b>B/355/1</b>	<b>Bruce Edwards</b>		

### Objections to Pre-Inquiry Proposed Changes

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/867/2032</b>	<b>House Builders Federation</b>		<b>334</b>
<b>B/844/2079</b>	<b>CPRW</b>		<b>334</b>

### Notes

- Objections B/1031/3, B/999/4, B/980/1 and B/959/4 are dealt with in the section of this report which relates to the omission of housing allocations in Caernarfon DCA.
- Objections B/952/24 and B/952/33 are dealt with in the section of this report which relates to the proposed housing allocation near Maes Coetmor, Bethesda.
- Objection B/839/4 is responded to in LPA proof 171 not 430.
- Objections B/243/1 and B/756/45 are dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text'.
- Objection B/1031/3 is responded to in LPA proof 5 not 118.
- Objection B/288/1 is dealt with in the section of this report which relates to the status of settlements within Llyn DCA.
- Objections B/952/20, B/981/1, B/965/6, B/1004/3 and B/952/8 are dealt with in the section of this report which relates to proposed housing allocations in Bangor DCA.
- Objections B/952/11 and B/952/16 are dealt with in the section of this report which relates to the status of settlements in Bangor DCA.
- Objection B/152/3 is dealt with in the section of this report which relates to proposed housing allocations in Caernarfon DCA.
- Objections B/952/3 and B/979/1 are dealt with in the section of this report which relates to the omission of housing allocations in Bangor DCA.
- Objection B/986/3 is dealt with in the section of this report which relates to the omission of housing allocations in Porthmadog DCA.
- Objection B/965/4 is dealt with in the section of this report which relates to the omission of housing allocations in Llyn DCA.
- Objection B/935/4 is dealt with in the section of this report which relates to proposed housing allocations in Llyn DCA.
- Objection B/783/4 is dealt with in the section of this report which relates to the Housing Introduction.
- Objection B/839/4 is dealt with in the section of this report which relates to the alignment of Development Boundaries in Caernarfon DCA.

### Main Issues

- The requirement for new house building in Gwynedd as a whole.
- The requirement for new house building in the area of the Gwynedd UDP.
- The requirement for housing allocations in the area of the Gwynedd UDP.

- The distribution of the housing requirement between the component parts of the plan area.
- The distribution of future house building between the tiers of the settlement hierarchy.
- The detailed wording of policy CH1.
- The relationship between the location of housing land allocations and the position of the Welsh language.
- The merits of the LPA's approach to phasing the development of housing allocations.

## **Inspector's Considerations and Conclusions**

### *The requirement for new house building in Gwynedd as a whole*

1. PPW (paragraph 9.2.2) advises that the latest Assembly Government National and Sub-National Household Projections for Wales should form the starting point for assessing housing requirements. Where LPAs seek to deviate from these they must justify the reasons for doing so.

2. Because up to date household projections for the area of the UDP were not available from the Welsh Assembly Government at the time of plan preparation the LPA, together with others in North Wales, commissioned the preparation of such projections from the London Research Centre.

3. In my view the non-availability of national or sub-national projections, and the urgent need to progress UDP preparation, are sound reasons for the LPA to take this course. The available projections have the merit of being consistent between the North Wales LPAs. No better alternative sources of projections were suggested by the objectors to the DD and the Pre-Inquiry Proposed Change version of the plan. The projections present numbers of households at various dates for the whole of Gwynedd, i.e. the part that is within the plan area and the part that lies outside this within the area of the Snowdonia National Park.

4. The plan period is for 15 years from April 2001 to April 2016. The DD (paragraph 5.1.12) presents the outcome of the projections of the London Research Centre that the number of households at 2001 (50840) is projected to increase by 4410 to some 55250 by 2016.

5. The Pre-inquiry Proposed Change version of the plan provides additional information by which the projected numbers of households are converted into projected numbers of additional houses. On that basis the 57451 houses in Gwynedd as a whole in 2001 is projected to increase by 5024 to 62475 in 2016. The figures for housing numbers are consistently 13% greater than those for households. The LPA explained at the relevant RTS that this allows for vacant dwellings, second homes and holiday homes. Objectors have not contended that this is an unreasonable adjustment.

6. An objector argues that the LPA should adopt the structure of the draft Flintshire UDP in relation to its housing policies. It is, however, the prerogative of this LPA to decide upon the appropriate structure of its planning documents, having regard to local circumstances.

*The requirement for new house building in the area of the Gwynedd UDP*

7. The 5024 projected new dwellings between 2001 and 2016 is for the whole of Gwynedd, including not only the area of the UDP but also the Snowdonia National Park which lies beyond this. In order to estimate the number of new dwellings to be built in the UDP area it was necessary to deduct from this those that are likely to be built in the area of the National Park.

8. An objector refers to DD paragraph 5.1.15 which informs that 81% of the population of Gwynedd as a whole lies within the UDP area and the remainder within the area of the National Park. He argues that the figure for the UDP area is, instead, 82%. The difference is not, however, meaningful in the process by which Gwynedd-wide household projections are translated into a UDP-specific requirement for housing land allocations.

9. The UDP (table 3) allows for some 627 dwellings to be built on permitted sites (i.e. those that already had planning permission) within the National Park area. The LPA for the Snowdonia National Park confirmed at the relevant RTS that this was a reasonable figure for the base date of the plan (2001).

10. Table 3 also makes an allowance for the construction of some 293 dwellings on small sites and windfall sites within the National Park Area in the period 2001 to 2016. The LPA for that area did not dispute that this was a reasonable assumption. It confirmed that it will monitor the situation and feed the outcome into the regular reviews of the UDP.

11. An objector expresses doubt that some 920 dwellings (i.e. the 627 on committed sites and 293 on small and windfall sites) will be forthcoming in the area of the National Park during the plan period. Building rates have averaged 57 dwellings per year in the period 1991 to 2005 in that area. This is the equivalent of 855 over 15 years and is near enough to the 920 figure that it does not significantly undermine the LPAs strategy. Any wider divergence, if it arises, can be dealt with by a future review of the UDP.

12. At DD stage table 3 had allowed for the construction of 40 dwellings on allocation sites within the area of the Snowdonia National Park. This was omitted from the Pre-inquiry Proposed Change version of this table. The LPA for the Snowdonia National Park confirmed at the relevant RTS that these 40 units had been proposed for allocation in an emerging development plan for that area. This plan is not now proceeding to adoption. I conclude that this is a reasonable basis for their omission from the proposed changed version of that table.

13. On this basis the amount of new house building to be accommodated within the UDP area has been calculated by the LPA as 5024 minus 627 minus 293 = 4104 dwellings.

14. An objector argues that, rather than base the housing requirement for the UDP area on the household/dwelling projections for the whole of Gwynedd and then make an allowance for the part of the supply likely to arise within the area of the Snowdonia National Park, it would have been better to have based the plan on UDP area-specific data from the start. The objector did not, however, indicate that such better data or forecasts exist or attempt to demonstrate that this would have resulted in significantly different conclusions.

*The requirement for housing allocations in the area of the Gwynedd UDP*

15. The LPA proposes to meet the estimated requirement for 4104 new dwellings in the UDP area in a number of ways. As at 2001 it had identified 991 dwellings which had not yet been built on sites which had planning permission. These dwellings are on sites which are reviewed by the regular Housing Land Availability Studies. No reasoned arguments were presented to cast doubt on their likely contribution to the housing stock during the plan period.

16. At DD stage table 3 incorporated an allowance of 1497 dwellings which the LPA anticipated would be constructed during the plan period on small sites and windfall sites. This is said to be based on a continuation of past trends that, on average, 92 new dwellings have been built each year on such sites in the UDP area. The construction of 92 units per year for 15 years results in a total of 1380 units, however, not the 1497 referred to. This is corrected in the Pre-inquiry Proposed Change version of table 3.

17. An objector noted that, in the Pre-inquiry Proposed Change version of table 3, the note to column 5 states that 'on average 92 new units were available in the area of the plan' when it should say that these had been built. The LPA agreed that this is the correct emphasis and has proposed NAP 52 to secure this.

18. The soundness of the assumption that 92 dwellings per year will be built on small and windfall sites for the whole of the plan period was queried by objectors because it is based on only 4 years experience. No earlier reliable data is, however, available, for the whole of the plan area. The LPA argued that the capacity of such sites coming forward since the 2001 base date of the plan confirms that there is, as yet, no basis for a conclusion that this is an unreasonable assumption. In the section of this report which relates to 'Affordable Housing for Local Need Text' I have recommended that the Development Boundaries of Local Centres and Villages be re-drawn so that they follow the existing built-up area more closely. This will not have the effect of reducing the scope for small and windfall sites to come forward. Within the Development Boundaries of settlements of all sizes Policies CH2 and CH3 will provide the framework within which small and windfall sites can be developed whilst Policy CH6 (as subject to NA 158) will provide the framework for dwellings to arise on Rural Exception sites directly adjoining the Development Boundaries of Villages and Local Centres.

19. The number of dwellings for which allocations of land must be made within the UDP area for the plan period is, therefore, 4104 minus 991 minus 1380 = 1733. When account is taken of negative numbers within two of the Dependency Catchment Areas (DCAs) shown in table 3, and these are treated as zero, the capacity of necessary housing land allocations can be regarded as some 1807 dwellings.

20. In appendix 3 the DD proposes the allocation of specific areas of land to meet this requirement. At Pre-inquiry Proposed Change stage, via NA233, it proposes changes to these. I consider the objections which have been made to these proposed housing land allocations on a site-specific basis elsewhere in this report. If my recommendations are accepted a total of 63.86 ha of land would be allocated for housing throughout the UDP area with a capacity (as stated by the LPA) of some 1608 dwellings.

21. The average density of development of these proposed allocations is only some 25 dph. Objectors argue that the proposed density of the allocated sites is too low. They refer to the findings of the combined Strategic Environmental Assessment and Sustainability Appraisal of the Gwynedd UDP Deposit Draft which was undertaken for the LPA. This advised that developments of about 25 dph represent an inefficient use of land. In some instances low density is appropriate, for example in more inaccessible, outlying areas. But in town centres and at public transport hubs, developments should be at higher densities, i.e. above 30dph.

22. PPW (paragraph 9.2.12) advises that higher densities should be encouraged on easily accessible sites, where appropriate, but these will need to be carefully designed to ensure a high quality environment. For the reasons I give in my consideration of the proposed housing allocations on a site by site basis, those that I recommend be retained in the plan are those that, among other things, provide opportunities for access to a reasonable range of facilities by sustainable transport modes. They are, therefore, in places where higher densities than an average of 25dph would be appropriate.

23. The necessary total of 1807 dwellings could be achieved on the 63.86ha of the proposed allocations that I have found to be acceptable if the average density of development was raised slightly to 28.3dph. If the average density was raised to 30dph this would generate some 1915 dwellings on the allocated sites. The excess of about 100 units over the estimated requirement for the capacity of allocated sites would provide a safeguard against any unexpected development constraints arising on them. It would still provide scope for densities above and below this average on individual sites to reflect their particular characteristics.

24. Objectors argue that there is a need for the allocation of additional sites for housing because particular ones among those proposed by the LPA are unsuitable for development and unlikely to be developed, or because there is a need to provide a 'slippage allowance' to compensate for any failure to implement sites which are suitable. I deal with the matters of site suitability and developability in my consideration of the proposed allocations on a site by site basis elsewhere in this report. Only those that I consider capable of beneficial development make up the 63.86ha of housing land that I refer to above. The extra dwelling capacity that would arise from raising the average development density to 30dph will satisfy the requirement for a slippage allowance.

25. In my view it would, in any case, be wrong to make any further provision for market housing allocations in the plan area as a whole beyond those that make up the 63.86ha for the following reasons. First, PPW (paragraph 2.3.2) advises that planning policies and proposals should promote resource-efficient settlement patterns that minimise land take.

26. Second, the overall capacity of the proposed allocations, together with that of the committed sites (with planning permission) and the reasonable assumptions regarding small and windfall sites is sufficient to meet the identified requirement for the whole of the 15 year plan period. PPW (paragraph 9.2.3) limits its guidance in relation to the quantity of housing land to be identified in development plans to the advice that these should ensure that sufficient land is genuinely available or will become available to provide only a 5 year supply of land for housing. If unforeseen events do materially restrict the housing land supply there is ample

scope for this to be addressed by the reviews of the plan, which DD paragraph 1.1.38 confirms will be undertaken every 5 years. The margin of supply over a 5 year requirement is sufficient to prevent any crisis of supply arising.

27. Third, the requirement for the plan period of 4178 dwellings (991 commitments plus 1380 small sites/windfall sites plus 1807 allocations) is equivalent to some 278 dwellings per year over 15 years. A 5 year requirement is some 1390 dwellings. The commitments alone would meet 991 of this leaving only 399 units to be identified. A continuation of the past rate of 92 units on small and windfall sites would, over 5 years, contribute 460 dwellings. Therefore the 5 year requirement of PPW can be more than satisfied without any allocations at all.

28. Fourth, the actual dwelling completions in the plan area over the first 3 years of the plan period averaged some 188 per year. This is only 75% of that provided for by the plan. This supports a conclusion that the estimate of housing requirement is, if anything, on the generous side.

29. Fifth, as I have already noted the projected household figures for 2001 and 2016 have been inflated by 13% to produce the projected housing stock figures. This 13% allows for vacant dwellings, second homes and holiday homes. However, in places where second homes and holiday homes are in demand (i.e. the villages in the Coastal and Rural Housing Market Areas) the LPA is making no allocations for market housing. The allocations are made only where these sorts of dwellings are not in demand. The plan, therefore, makes an allowance in its housing requirement for a housing type which is unlikely to be taken up at previous rates. It thereby leaves spare capacity to meet other sorts of housing need.

30. Taken together these factors are sufficient justification for not increasing the housing land requirement figure. In reaching this view I have noted that some objectors argue that the mechanism of the housing requirement forecast is unclear and not detailed within the plan or that individual components of the calculation could have been given different values and these could, possibly, have resulted in a higher estimate.

31. An objector argues that there is double counting between the 'commitments' and the assumptions made in relation to the dwellings likely to arise on small and windfall sites. The first category is based on actual known sites with planning permission. The second category is an assumption about the capacity of small and windfall housing sites which will come forward for planning permission and be approved in the future, based on past trends. There can, therefore be no double counting between them.

*The distribution of the housing requirement between the component parts of the plan area*

32. Having identified an overall requirement for housing allocations, the LPA distributed these between the component parts of the UDP area. It sought to do this in a way which promoted a sustainable pattern of settlement and, therefore, had regard to the size of settlements and the range of services, facilities and opportunities available within them. It also sought to reflect the geography of this large and diverse plan area and the effect of physical features in constraining movement between the origins and destinations of trips.



33. Dependency Catchment Areas (DCAs) were therefore, defined by the LPA to encapsulate functional areas by reflecting the way that residents were perceived to use the facilities and services of an area and travel between them. In defining their coverage the Council consulted adjacent LPAs. The DCAs sometimes extend beyond the boundaries of Gwynedd as a whole to reflect the actual activities and travel patterns of residents. Their principal use has been in policy making in relation to housing land but they were said to also have a role in planning for retailing, employment land and various regeneration schemes.

34. The notes to table 3 describe a steering exercise which directed a disproportionate amount of new house building to particular DCAs. This was undertaken by the Unitary Development Plan Steering Group of elected members of the LPA. Various levels and patterns of steerage were applied and political judgements were made on the basis of the particular population profiles of each DCA, together with the effect of different levels of new house building upon them. The aim was to promote a sustainable pattern of settlement by steering most development to the most sustainable places while, at the same time, supporting the smaller settlements which were of importance to the maintenance of indigenous local culture. Objectors argued that such an intuitive process lacked the necessary technical rigour.

35. At the relevant RTS the LPA was unable to demonstrate the technical basis for the definition of DCA boundaries or justify the actual distribution between the DCAs on any basis other than that it had been made by elected members and reflected political judgement. Objectors, however, did not postulate an alternative distribution based on rational and quantifiable arguments. There is, therefore, no basis on which I can conclude that the distribution of housing allocations between DCAs should be changed in any particular way. It is clear, however, that the use of the DCAs has led to the promotion of an unsustainable pattern of settlement by the way that their boundaries have been regarded by the LPA as defining 'water tight compartments' unduly constraining the distribution of housing allocations.

36. The LPA confirmed that if, within a particular DCA, there was insufficient scope to locate the necessary housing allocations within the largest settlements e.g. an Urban Centre, because of development constraints, it sought to find alternative sites within the same DCA rather than look for opportunities in a settlement of similar status in an adjacent one. This often meant diverting allocations to Local Centres and even to Villages. I refer to the problems which arise from this in the following sub-section.

37. The actual geography of the plan area does not, in any case, support such an approach. Bangor and Caernarfon are in different DCAs, as are Criccieth and Pwllhelli but no insuperable physical barrier lies between them. Indeed, it is possible to live in one and work, shop or attend school in another by undertaking a very short journey along a good public transport corridor.

38. The lack of information on the technical basis for the definition of DCA boundaries, the lack of an explicit and reasoned basis for the distribution of the housing land requirement figures between them and the clear inappropriateness of DCA boundaries in several instances combine to convince me that this process lacks credibility. In my consideration of the merits of, and objections to, each individual proposed housing land allocation and in relation to the omission of these and to the alignment of Development Boundaries, I have had regard to the

characteristics of the site and the merits of its location in terms of sustainability. I have not given significant weight to the need to respect the control totals of housing land requirement within individual DCA boundaries.

*The distribution of future house building between the tiers of the settlement hierarchy*

39. Objectors argue, variously, that the UDP proposes an undue concentration of new house building in the larger settlements and, in particular, in the Sub-regional Centre of Bangor or that it proposes the reverse, an undue concentration on the smaller settlements and in particular the numerous villages of the plan area.

40. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or in other locations which are, or can be, well served by public transport or can be reached by walking or cycling. PPW (paragraph 9.2.9) advises that, in deciding which sites to allocate for housing, LPAs should consider the location and accessibility of potential development sites to jobs, shops and services by modes other than the car. It is clear that the larger the centre, the greater the scope to minimise car use.

41. In the context of the UDP area the existing urban areas comprise the Sub-regional Centre, the Urban Centres and the Local Centres. Some, but not all, Villages are well served by public transport. In the early years of the plan period, however, the majority of housing land planning permissions and housing completions have been located within the Local Centres, Villages and Rural Villages.

42. At April 2001 the distribution of the committed housing sites (those with planning permission) which are referred to in table 3 of the DD must have reflected the policies that pre-date the UDP. Of this total capacity only some 15.8% was in the Sub-regional Centre and a further 14.8% in the Urban Centres. Altogether some 69.4% was in the Local Centres, Villages and Rural Villages.

43. At April 2002 the capacity of planning permission sites in the Sub-regional Centre had fallen to 9.6% of the total and in the Urban Centres to 12.6%. The capacity in the Local Centres, Villages and Rural Villages had risen to 77.8%.

44. At April 2004 the capacity of planning permission sites in the Sub-regional Centre had fallen again to 8.3% of the total and that of the Urban Centres had risen, but only to 14.3%. The planning permissions in the Local Centres, Villages and Rural Villages had remained constant at 77.4%.

45. Of the actual dwelling completions in the first 3 years of the plan period (from 2001/2 to 2003/4) only some 15.9% were in the Sub-regional Centre and 15.2% were in the Urban Centres. Completions in the Local Centres, Villages and Rural Villages were 68.9% of the total.

46. In the UDP (DD version) the capacity of the proposed allocations for market housing is distributed as follows. Some 38.8% to the Sub-regional Centre, 25.6% to the Urban Centres but 35.6% to the Local Centres and Villages.

47. In the UDP (Pre-inquiry Proposed Change version) the capacity of the allocations for market housing is distributed as follows. Some 35% to the Sub-

regional Centre and 24% to the Urban Centres, but 41% is still directed to the Local Centres and Villages.

48. If my recommendations, in relation to the proposed housing allocations at DD stage, as subject to the Pre-inquiry Proposed Change, are accepted, the distribution of dwellings built upon them would be some 39.1% to the Sub-regional Centre, 23.3% to the Urban Centres and 37.6% to the Local Centres and Villages.

49. I conclude that the LPA is attempting to steer the pattern of new house building away from a past unsustainable distribution, but that the degree of change proposed is marginal at best. It is certainly not the dramatic re-direction of development that is needed to achieve the aims of PPW. It is a cause for concern that some 70% of the capacity of the commitments (sites with planning permission) which make up such a large part of the total land resource, is in the smaller settlements. The LPA seeks to justify its decision at pre-inquiry change stage to locate 41% of the capacity of the new housing allocations in the Local Centres and Villages (37.6% if my recommendations are accepted) on the basis that it is a reflection of the particular circumstances of the plan area with its dispersed rural population, and as an attempt to sustain local facilities (even though it would probably not attract new ones) thereby avoiding a worsening situation of rural dwellers having to travel further for day-to-day facilities.

50. However, in the interests of promoting a sustainable pattern of settlement it is necessary to reduce the proportion of new house building that takes place in the Local Centres and Villages so that it may be increased in the Sub-regional Centre and the Urban Centres. As a contributory factor in achieving this necessary steerage it is necessary that no additional allocations of market housing above those which I endorse in this report from among those proposed at DD and Pre-inquiry Proposed Change stages, be made in the Local Centres and Villages. For the same reason it is necessary to restrict the quantity of new house building which arises in such settlements from windfall sites. This can be achieved by drawing the Development Boundaries tightly around them. If my recommendations are accepted residential development would still arise in Local Centres and Villages within the Plan period from: the past completions since April 2001; the commitments on undeveloped sites which already have planning permission; windfall sites within the re-drawn Development Boundaries; rural exception sites outside but immediately adjacent to them; the housing land allocations which I have endorsed from those that have been proposed by the Local Planning Authority in such places; and any allocations to be made by the Local Planning Authority purely for 100% affordable housing. It is therefore clear that acceptance of my recommendation does not entail a complete embargo on future house building in Local Centres and Villages. Instead it would promote the necessary re-direction of development to advance the aims of PPW.

51. If my recommendation on this matter is accepted it will nevertheless satisfy the concerns of several objectors by maximising the opportunities for the use of sustainable transport modes, thereby reducing the environmental footprint of Gwynedd, while at the same time providing scope for the construction of necessary dwellings.

52. An objector notes that the DD proposes no allocations of housing land in the village of Llandbedrog. He argues that these are needed there in order to promote a sustainable pattern of settlement. For the reasons I give in this sub-section I

conclude that no allocations of market housing in addition to those I endorse should be made in the Villages of the UDP area.

*The detailed wording of Policy CH1*

53. The DD version of Policy CH1 provides that proposals to build houses on sites designated for housing use, as noted in the table, will be approved. There will be a presumption against developing these sites for any use other than for housing. An objector argues that the policy does not actually allocate land for housing. I consider that the words used in the policy indicate clearly that the sites referred to are those that are intended to be developed for housing.

54. A further objector argues that the last sentence of DD Policy CH1 would prohibit the use of any part of an allocated housing site for purposes such as education or open space. The LPA agrees and, via NA 153, proposes to remove this prohibition. I agree because the DD wording would prevent the juxtaposition of land uses that are closely related in functional terms. Contrary to the views of an objector at pre-inquiry change stage, it would reduce the prospect of achieving a sustainable pattern of development. The objector also notes that the policy wording lacks clarity as to which table is referred to. He argues that its meaning would be improved if a direct reference was made to Appendix 3, the proposals map and the role of the Development Briefs. The LPA agrees, and, via NA 153, proposes to change the wording and structure of the policy to incorporate these references. I conclude that this would enhance the clarity of policy expression but note that the wording proposed by NA 153 omits the necessary words 'will be approved'. The LPA proposes, via NAP 89, to insert these. This is necessary in the interests of clarity.

*The relationship between the location of housing land allocations and the position of the Welsh language*

55. The LPA has deliberately avoided making allocations for market housing in the villages which are within what it has defined as coastal and rural housing market areas in order to reduce the scope for house purchase there by people from outside Gwynedd who are seeking holiday and second homes. It has done this because such persons are considered to be less likely than local people to speak Welsh. Objectors argue that allocations of market housing should be made in these villages in recognition of long established trends. Others contend that it is incomers to particular settlements who have preserved and enhanced Welsh culture.

56. PPW (paragraph 2.10.1) advises that the land use planning system should take account of the needs and interests of the Welsh language and, in so doing, contribute to its well being. Both the LPA and objectors are faced with a dilemma. If there are allocations for market housing in a particular settlement they may attract people of non-Welsh culture and, thereby, weaken the social fabric. If, however, the LPA does not make such allocations then the children of indigenous people can't remain in or return to the village. This too, would weaken the social fabric. In the absence of new allocations in the settlements that are popular the demand won't simply go away. It will, instead, inflate the price of the existing housing stock, removing it even further from the reach of local people. Also the absence of new general market construction will result in an absence of new affordable housing which would have been associated with that.

57. The LPA can't seek to control the occupancy of dwellings on linguistic grounds (PPW, paragraph 2.10.3). However, PPW advises that it should be the aim of LPAs to provide for the broad distribution and phasing of housing development, taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Appropriate UDP policies about the broad scale, location and phasing of new development can assist in that aim. The LPAs approach of distinguishing between settlements where second homes and holiday homes are in demand and those where they are not (the villages in the urban, dormitory and post-industrial housing market areas) and making allocations for market housing only in the latter category, is based on this advice. I conclude that it will achieve the desirable objective of maintaining the position of Welsh language and culture via the land use planning system to the extent that Government planning policy guidance allows.

*The merits of the LPA's approach to phasing the development of housing allocations*

58. The DD (paragraph 5.1.19) proposes that the development of particular proposed housing allocations should be phased by dividing their capacity between two development periods. This would allow the pace of development to reflect the impact of new housing on the facilities or employment opportunities available in a settlement and on its social fabric.

59. The DD (in Strategic Policy 10) presents a summary of the phasing of allocated sites within each DCA for the periods 2001 to 2011 and 2012 to 2016. This table is proposed to be deleted by NA 29 but nothing is proposed to be put in its place. The LPA, at the RTS, proposed that the phasing of the allocated sites would be achieved in the following way. The sites to be phased would be shown on the proposals map with the letter 'G'. The reasons for the phasing of the particular sites would be presented in the relevant Development Brief document. When an application is made for planning permission the LPA would, on such sites, negotiate with the developer the details of the phasing to be applied, having regard to local factors. Objectors are concerned that this approach would not secure necessary certainty in relation to future house building levels and that the reference to Development Briefs gives those documents an undue status in the decision process.

60. PPW (paragraph 3.1.2) advises that UDPs are intended to provide a firm basis for rational and consistent decisions on planning applications and appeals. In paragraph 3.1.6 it advises that UDPs should give developers and the public certainty about the type of development that will be permitted at a given location. For these reasons I agree with objectors that the LPAs intended approach should be made explicit in the plan. The stated intention of the LPA to negotiate the details of phasing with developers at planning application stage would allow the actual pace of development to reflect the circumstances then current (and allow the developer to present an assessment of these at that time) rather than those pertaining at the time of UDP preparation. Such an approach would maximise the scope for new housing provision while protecting interests of acknowledged importance.

61. This approach would, therefore, maximise certainty that housing development will proceed at as rapid a rate as prevailing circumstances allow. Since the Development Brief would present only the reasons why phasing is

needed, but not the actual details of this (which would be determined via negotiations) these documents would not condition the actual planning decision.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0435) that the capacity of the proposed housing allocations be reviewed with the objective of raising the average density of these to at least 30dph;**

**(REC.0436) that the DD be modified by the replacement of the note to column 5 of table 3 with the text presented in the Pre-inquiry Proposed Change, subject to the reference in the third sentence to the 92 new units being available being replaced with text to confirm that these units were actually built;**

**(REC.0437) that the DD be modified to incorporate the LPA's intended approach to the phasing of development of the sites allocated for housing as follows: that the sites to be phased be shown on the proposals map with the letter 'G'. The reasons for the phasing of the particular sites are to be presented in the Development Briefs document. When an application is made for planning permission the LPA will, on such sites, negotiate with the developer the details of the phasing to be applied, having regard to local factors then pertaining;**

**(REC.0438) that the DD be modified by the acceptance of NA 153 as proposed to be changed by NAP 89;**

**(REC.0439) that no other modification be made to the DD in response to these objections.**

**POLICY CH2 – NEW HOUSES ON UNDESIGNATED SITES WITHIN THE DEVELOPMENT BOUNDARIES OF THE SUB-REGIONAL CENTRE AND URBAN CENTRES**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP58

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/999/6	Rossisle Development Co. Ltd	M Gilbert	507
B/330/3	Phil Wheeler		507
B/1032/7	Mrs C Jones	John Alun Jones	507
B/960/3	Mrs Lowri Williams	Charles F Jones & Son	507
B/983/6	Headland Promotions	Emery Planning Partnership	507
B/987/3	Mr Tim Singh	Geraint Lewis Associates	507
B/967/3	Mr Aled Wyn Evans	John Alun Jones	454
B/966/3	DW & P Worsley	John Alun Jones	507
B/965/3	Watkin Jones	Dalton Warner Davis	538
B/288/3	Andrew Foskett		507

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/1005/6	British Telecommunications Plc	Mandip Dhillon (RPS)	
B/982/1	Mr Brian Jones	Gareth J White, Gareth White Partnership	

**Notes**

- Objection B/967/3 is dealt with in the section of this report which relates to omissions to housing allocations in the Porthmadog DCA.
- The element of objection B/999/6 which relates to land at Llainwen, Llanberis, is dealt with in the section of this report which relates to omission from housing allocations in the Caernarfon DCA.
- Objection B/330/3 is dealt with in the section of this report which relates to Policy CH1.

- Objection B/987/3 is dealt with in the section of this report which relates to the alignment of Development Boundaries in the Tywyn DCA.
- Objection B/966/3 is dealt with in the section of this report which relates to the alignment of Development Boundaries in the Llyn DCA.
- Objection B/288/3 is dealt with in the section of this report which relates to the status of settlements in the Llyn DCA.
- Objection B/965/3 is dealt with in the section of this report which relates to the omission of housing allocations in the Llyn DCA.

### **Main Issue**

- Whether the DD is appropriate, having regard to the scope of the policy.

### **Inspector's Considerations and Conclusions**

1. DD Policy CH2 provides that new houses on undesignated sites within the Development Boundaries of the Sub-regional Centre and Urban Centres will, in principle, be approved. Objectors argue that the scope of the policy should be extended to permit windfall development within Local Centres and Villages. Such a provision is, however, already made by Policy CH3.

### **RECOMMENDATION**

**I recommend:**

**(REC.0440) that no modification be made to the DD in response to this objection.**



**“AFFORDABLE HOUSING FOR LOCAL NEED TEXT”**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA154

This Section is subject to Further Proposed Changes Nos: NAP46; NAP96; NAP97

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/11	Aberdaron Community Council		533
B/731/12	Iwan Rhys Edgar		533
B/1042/4	Owen Davenport Ltd		533
B/768/6	Gareth Dobson		533
B/866/30	Snowdonia National Park		533
B/932/4	Mrs P Owen	Ron Douglas, Douglas Planning	533
B/762/2	Alan Osbourne & Ann Vaughan Jones		99
B/667/4	Glyn Thomas		369
B/867/23	House Builders Federation		533
B/866/29	Snowdonia National Park Authority		533
B/727/1	Cyng. Dafydd Glyn Owen		533
B/118/4	Dyfed C Thomas		RTS
B/824/1	Dafydd Henry Williams		29 & RTS Aff Hou
B/876/1	Beryl Fretwell		369
B/243/1	I Thomas		37
B/357/1	M Jones		490

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/29	Sustainable Gwynedd Gynladwy		533
B/870/32	Sustainable Gwynedd Gynladwy		533
B/734/129	Welsh Assembly Government		533
B/734/128	Welsh Assembly Government		490
B/734/130	Welsh Assembly Government		490
B/911/5	Tywyn Town Council		533

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/33	Sustainable Gwynedd Gynaladwy		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/589/3	Wyn Hobson		
B/866/28	Snowdonia National Park Authority		
B/870/31	Sustainable Gwynedd Gynaladwy		
B/870/30	Sustainable Gwynedd Gynaladwy		
B/553/1	Christopher William Jones		
B/555/1	Llyn Community's First Partnership		
B/767/11	Friends of the Earth (Mon & Gwynedd)		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2196	Welsh Assembly Government		490
B/589/2004	Wyn Hobson		490
B/734/2216	Welsh Assembly Government		490

### Notes

- Objection B/243/1 is responded to in LPA proof 370 not 37.
- Given their close inter-relationship with this section I have dealt with most of the objections to Policies CH3, CH4, CH5 and CH6 herein.

### Main Issues

- The definition of affordable housing.
- The need for affordable housing in the plan area.
- The proposed method of securing affordable housing.
- The merits of further residential development in Rural Villages.
- The merits of removing permitted development rights from affordable homes permitted under Policies CH3 and CH4.
- The framework of Government guidance.
- The comprehensibility of the plan.

## Inspector's considerations and conclusions

### *The definition of affordable housing*

1. The DD (paragraph 5.2.8) bases its policy on affordable housing upon the view of the Local Government Association that the definition of affordability should derive from the relationship between household income, house prices and rents. It notes that there is a distinction to be made between housing which is available for purchase at a price which can be afforded, having regard to local incomes, which it classifies as 'Local Need Affordable Housing' and housing available to be rented from a registered social landlord at an affordable cost which it terms 'Social Affordable Housing'. The LPA, at Pre-inquiry Proposed Change stage, considered these two terms to be superfluous and, via NA 154, proposed to delete them. However, TAN2 (June 2006) subsequently introduced a classification system which is very similar to that in the DD.

2. 'Social Rental Housing' is that provided by local authorities as registered social landlords. 'Intermediate Housing' is that where prices or rents are above those of social rent but below market prices or rents. All other types of housing are referred to as 'Market Housing'. I conclude that it would enhance the understanding of the UDP and secure future consistency with adjoining areas if the UDP adopted the terminology used by TAN2. I note that the LPA proposes to secure this via NAP 46. This has not been the subject of public consultation and a full debate on its merits has not been possible. The LPA should carefully consider any representations made in this respect at modification stage.

3. An objector argues that the definition of need for affordable housing in DD paragraph 5.2.17 should include households living in properties too large for their needs or too difficult for them to maintain. The LPA agrees and, via NA 154, proposes to insert the criterion that 'the dwelling is unsuitable due to requirements associated with a disability, long term illness or other long term physical difficulties'. I conclude that this would satisfy the concerns of the objector.

### *The need for affordable housing in the plan area*

4. The advice of TAN2 is that the requirements of a development plan in relation to affordable housing should be justified by reference to a recent Local Housing Market Assessment. The policies of the UDP are based on such an assessment undertaken in July 2000 and published in 2002 which, the LPA argues, demonstrates a substantial deficit of affordable housing throughout the UDP area. Objectors express concern that this work was undertaken too long ago to be regarded as a sound basis for the plan. The LPA refers to work done more recently to update this assessment and which supports the conclusion that its findings are still valid. The most recent of these studies was carried out in 2004/05. This showed that, rather than reducing, the need for affordable housing had increased since 2000. The level of need expressed in the UDP should, therefore, be regarded as a minimum. The LPA confirms that further assessments will be carried out which will inform the future review of the plan.

5. TAN2 advises that development plan policies should be based on an up-to-date assessment of the full range of housing requirements across the plan area

over the plan period. The Local Housing Market Assessment of July 2000 showed that the highest demand and greatest shortfall of affordable housing were in the Bangor, Caernarfon and Porthmadog areas. Objectors argue that relevant UDP policies should be limited to those areas. Although these were the areas containing the highest numbers of those in need, I conclude that the percentage of households requiring affordable housing throughout the area of study is sufficient to justify the application of the relevant policies to the whole of the UDP area.

6. The Local Housing Market Assessment identified the need for a minimum of 130 affordable dwellings to be created per year. The LPA confirms that this figure is for Gwynedd as a whole and that the study does not provide the basis for distributing this between the UDP area and the rest of Gwynedd. I agree with the LPA that it would be reasonable to split the total on the basis of the share of population in each area. On that basis about 81% of the annual figure, some 105 units, would be required within the UDP area. The LPA confirms that the 105 per year figure is the amount of affordable housing required to meet needs from all sources, not simply those households which would satisfy the criteria of Policies CH3 and CH4 (which deal with new dwellings on undesignated sites within local centres and villages, and new dwellings in rural villages respectively).

7. A minimum of 105 affordable dwellings per year for 15 years amounts to some 1575 dwellings. Appendix 3 of the UDP, at Pre-inquiry Proposed Change stage, indicates that some 561 affordable dwellings would arise from the allocated sites. For the reasons I give in my consideration of the proposed housing allocations on a site by site basis, elsewhere in this report, I have recommended that certain proposed allocations be deleted. I have, however, recommended that the total capacity of allocated housing sites be maintained by a slight increase in the development density. I, therefore, conclude that it is still possible for some 560 affordable dwellings to arise from the allocated sites.

8. The LPA confirms that very few affordable dwellings will arise from the committed sites (i.e. those with planning permission) which are referred to in UDP Table 3. The balance of some 1014 affordable dwellings would, if it is to be achieved, take up some 73% of the 1380 dwellings which the LPA assumes will arise during the plan period on small and windfall sites. The LPA concedes that the 105 dwellings per year target may well not be met. For this to happen it recognises that 'all the cards must fall correctly'. This reinforces my conclusion that the policies in respect of Affordable Housing should be applied throughout the plan area.

*The proposed method of securing affordable housing*

9. Policy CH5 provides at, DD stage, that proposals to develop 10 or more dwellings on allocated housing sites or on windfall sites of 10 or more dwellings must, if they are to be approved, incorporate a percentage of affordable dwellings for General Local Need. This proportion will vary from site to site. General Local Need Affordable Housing is intended to accommodate people who have lived or worked in the Dependency Catchment Area (DCA) which contains the site or within a Community Council area adjoining this for a continual period of 10 years immediately before submitting the planning application or occupying the property. People who live outside the DCA but who have previously lived within it for a continual period of 10 years or more, and those who live outside the DCA but who have lived there in the past for a total period of 10 years including a continual

period of 5 years or more within a period of 20 years, also qualify under the terms of General Local Need.

10. Pre-inquiry Proposed Change NA 157 requires that a percentage of affordable dwellings must be provided on all allocated housing sites regardless of their capacity. This must also be provided on windfall sites of 5 or more dwellings that become available in the Sub-regional Centre or in the Urban Centres.

11. Policy CH3 provides, at DD stage, that proposals to build dwellings on windfall in-fill sites within the Development Boundaries of Local Centres and Villages will be approved only if they provide General Local Need Affordable Housing. NA 155 proposes to remove the reference to in-fill.

12. Policy CH6 provides, at DD stage, that proposals for affordable dwellings on suitable rural sites directly adjoining the Development Boundaries of Villages will be approved as an exception to usual housing policies provided, among other things, that a General Local Need for Affordable Housing has been demonstrated. NA 158 proposes that the scope for such Rural Exception Sites should apply not only to land adjacent to Villages but also adjacent to Local Centres.

13. Policy CH4, at DD stage, provides that in Rural Villages a total of 2 new dwellings will be approved in the first 10 years of the plan. Where this has occurred one additional dwelling will be approved during the last 5 years of the plan. The grant of planning permission will depend, among other things, on a Local Community Need for affordable housing being demonstrated. The concept of 'Local Community Need' is more limited than that of 'General Local Need', because Rural Villages are considered by the LPA to have a more sensitive character than the larger settlements in social, cultural, linguistic and physical terms.

14. To qualify under the terms of 'Community Local Need' persons must have lived in the Community Council area for a continual period of 10 years immediately before submitting the relevant planning application or occupying the property in question. Alternatively they must have lived in that area for a continual period of 10 years or more in the past. People would also qualify if they have lived or worked for a continual period of 10 years or more within 4 miles 'as the crow flies' from the heart of the Rural Village.

15. NA156 seeks to change the text of Policy CH4. There is missing text in the proposed wording and it is intended to read 'in Rural Villages proposals for residential developments that include one or two units only will be permitted'. This again is subject to the requirement that a Local Community Need for an affordable dwelling has been proven.

16. Objectors express concern that the stated targets for the percentages of affordable homes on allocated sites are too high and will, in certain cases, prevent a financially viable development, or are too low and do not reflect local needs. They note that the DD plan, in relation to Policy CH5, does not reflect the advice of TAN2 (paragraph 10.9) that the stated percentage of affordable housing on each allocated housing site should be indicative and not prescriptive. The LPA agrees that this is necessary and, via NA 157, proposes to introduce text to confirm both that the percentage figures are indicative and that it will discuss these indicative targets, where relevant, and in accordance with the advice of PPW (paragraph

10.10), negotiate with developers to include an element of affordable housing on sites that are the subject of the policy.

17. Objectors note that such an approach is necessary in all cases and, therefore, that the words 'where relevant' are not appropriate. The LPA, at the RTS, concurred with this view. I also agree that discussions are needed in every case and will enable the particular characteristics of each site to be reflected in the numbers of affordable housing provided.

18. Objectors express concern that DD Policy CH5, as proposed to be changed by NA 157, requires a percentage of General Local Need Affordable Housing on allocated sites of all capacities. They fear that, on the small sites, this will erode profitability to the point where the site will be incapable of development and no affordable housing will be provided at all. For this reason they argue that the policy would be counter-productive.

19. TAN2 (paragraphs 10.3 to 10.8) advises that thresholds (a site capacity threshold for residential development on allocated and unallocated sites above which an element of affordable housing may be sought) may be set for the plan area as a whole, or different thresholds may be set for different parts of the plan area. When setting site capacity thresholds and site specific targets the LPA should balance the need for affordable housing against site viability.

20. TAN2 (paragraph 10.6) gives an example that if 90% of all housing completions are expected on sites of less than 5 units, then it may be appropriate to seek affordable housing on sites of 3 or more dwellings. Site viability will be a critical factor in determining thresholds, particularly on small sites. I recognise that all allocations of housing land in the UDP are of 5 dwellings or more capacity, and this is reflected in the proposed amended threshold for windfall sites in Policy CH5. Depending on the circumstances of particular sites a 5 dwelling threshold may be an appropriate one. However, given the emphasis placed by TAN2 on site viability (without which no development, including that for affordable housing, will take place) and the realisation (paragraph 10.10) that affordability of housing can change over a relatively short period, it is necessary for the UDP to take a more flexible approach than that proposed by Policy CH5.

21. In conformity with the advice of TAN2 (paragraph 10.10) LPAs should treat both thresholds and site specific affordable housing targets (percentages) as being indicative. The plan should, however, confirm that, in negotiation with developers, there would be strong expectation that the indicative target would be provided.

22. Objectors express concern that prospective developers may seek to implement a housing site piecemeal in parcels that would, individually, fall below the threshold at which a proportion of affordable housing would be required. The LPA agrees that this is a cause for concern and, via NAP 49, proposes revised wording to deal with this. This Further Proposed Change has not been the subject of public consultation and a full debate on its merits has not been possible. If the LPA considers that this change is appropriate it should pursue it at modification stage.

23. Paragraph 5.2.38 of the DD refers to a target of between 10% and 50% for the provision of affordable housing on sites which are subject to Policy CH5. An objector argues that, in the interests of certainty, this paragraph should refer to

the indicative targets presented in Appendix 3 and in the Development Briefs. The LPA agrees and proposes to secure this via NA 157.

24. The DD (paragraph 5.2.8) proposes, among other things, that at least 1% of the ownership of affordable dwellings should be transferred to the Local Authority. Objectors argue that this is not necessary to secure their continued availability as affordable dwellings. The LPA agrees and, having regard to prevailing uncertainty about the legality of this approach proposes, via NA 154, to remove this requirement. I conclude that planning conditions and/or obligations are sufficient to secure the continuing availability of dwellings to meet the need for affordable homes without the need for part ownership by the Local Authority.

25. Objectors argue that it is not always desirable to restrict the occupancy of affordable housing to those who conform to the definition of General Local Need presented in the DD. Each of the DCAs contains substantial settlements, the population of which is not unduly sensitive to the characteristics of newcomers. Essential workers from outside the UDP area or residents of Gwynedd from outside the relevant DCA could legitimately need to live in or near to the Sub-regional Centre, an Urban Centre or a Local Centre.

26. TAN2 (paragraph s10.16 and 10.17) advises that LPAs must set out in their development plans their definition of local need for affordable housing and envisages that the area within which needs will be considered to be 'local' may include the village or group of villages, the Community Council area, an electoral ward or group of wards or the whole of the local authority area. However, paragraph 10.16 confirms that the need for such specification is confined to the provision of affordable housing in rural areas. There is, therefore, no basis for its application to housing development in the Sub-regional Centre, Urban Centres or Local Centres.

27. Objectors argue that windfall sites within the Development Boundaries of Local Centres and Villages should not be limited to only General Local Need Affordable Housing because this would eliminate the scope for financial support from a related element of Market Housing. It would cause the development process to rely on public sector funding. This, in turn, would be difficult to co-ordinate because the inherent uncertainty which arises from a reliance on windfall sites will make it difficult for infrastructure providers to know where to provide increased capacity in advance of a planning application. They argue that the LPAs approach would reduce, rather than increase the prospect that the necessary levels of affordable housing will be achieved.

28. Other objectors argue that people with personal links to Local Centres and Villages, but who can afford to buy market housing, would be excluded from future residence in those settlements. They emphasise that such people should be given as much opportunity to live in those places as those who are in need of affordable housing.

30. The LPA argues that the extent of the need for affordable housing justifies its approach, and, in order to promote such development, it has deliberately drawn the Development Boundaries of Local Centres and Villages in such a way as to include numerous areas of open countryside within them. At the relevant RTS it confirmed that these were intended to stimulate the submission of planning applications for affordable housing under the terms of Policy CH3 on the basis that

these would be regarded as windfall sites. By deciding in advance where such development should go the LPA is, effectively, making pseudo-allocations for housing development, but limiting the dwellings to be built on these sites to General Local Need Affordable Housing only. Objectors argue that this approach simultaneously erodes the rural setting of many small settlements, leads to uncertainty as to the location of future development and gives too much emphasis to affordable housing compared with market housing. The latter, it is argued, is needed in Local Centres and Villages to maintain their social and commercial vitality.

31. PPW (paragraph 9.1.1) advises that the Assembly Government seeks to ensure that the overall result of new housing development in villages, towns or the edge of settlements is a mix of affordable and market housing. In paragraph 9.1.2 that document promotes mixed tenure communities. In paragraph 9.2.14 it emphasises the desirability, in planning terms, that new housing development in both rural and urban areas should incorporate a reasonable mix and balance of house types and size to cater for a range of needs. In paragraph 9.2.16 PPW advises that the requirement that a proportion of affordable housing be sought from developers applies to both the allocated sites and to unallocated (windfall) sites. This advice is repeated in TAN2 (paragraph 10.5). It is, therefore, inappropriate for the LPA to propose, via Policy CH3 that all windfall sites in Local Centres and Villages should be restricted to the development of affordable housing only.

32. If the pseudo-allocations are allowed to remain in the plan they would, in accordance with PPW and TAN2 guidance, have to be available for the development of both market and affordable dwellings. Having regard to the advice of TAN2 (paragraph 9.1) that the level of affordable housing in a development must be realistic, it would be likely that in any such development market housing would predominate. For the reasons I give in the section of this report which relates to policy CH1 I have concluded that there is no need for additional allocations of market housing in the plan area as a whole above those which I endorse in this report. Furthermore, in the interests of promoting a sustainable pattern of settlement the scope for housing development in the Local Centres and Villages should be strictly controlled. For this reason it is necessary for the Development Boundaries of each of the settlements in these particular categories to be re-drawn so that they tightly enclose the actual consolidated built-up area of each one, thereby limiting the scope for windfall housing development.

33. Such an approach would conform to the stated purpose of Development Boundaries in the DD (paragraph 1.3.47) that they are to restrict development to sites that are within settlements so as to regulate and protect the countryside. The elimination of the pseudo-allocations would, therefore, promote the internal consistency of the plan as a whole.

34. Any concern that this re-drawing of the Development Boundaries of Local Centres and Villages would reduce the scope for windfall sites to make their anticipated contribution to the overall housing land supply can be disregarded because the LPA, at DD and Pre-inquiry Proposed Change stages, has assumed that such sites will meet General Local Need for Affordable Housing only, in accordance with the provisions of Policy CH3. Such housing can be permitted in rural areas directly adjoining the tightly re-drawn Development Boundaries on Rural Exception Sites under the terms of Policy CH6.



35. If the LPA is convinced that developments for 100% affordable housing are necessary upon specific sites within particular settlements, the advice of TAN2 (paragraphs 10.1, 10.9, and 10.12) is that these should be achieved via allocations of land for this purpose. The Development Boundaries of relevant settlements would, of course, be defined to include such allocations. Such sites should, in accordance with TAN2 advice, be in places where evidence has identified the need for affordable housing to contribute to the creation of balanced and sustainable communities. The selection of the sites should be based on criteria set out in the development plan (eg accessibility to jobs, shops and services by modes of transport other than the car, and the potential to improve such accessibility). Such sites are likely to be small in scale and, in relation to the total number of sites available in a local planning authority area, small in number.

36. The important role of specific formal allocations of land for affordable housing is emphasised by the advice of TAN1 (paragraphs 7.1.1 to 7.1.3) that it is vital to monitor the numbers of affordable houses built each year and that this monitoring should be undertaken in relation to sites which have been granted planning permission or which have been allocated in a development plan. Allocation of sites for affordable housing is, therefore, seen as an essential element of a development plan approach that allows monitoring. It is an essential element of the plan, monitor and manage approach.

37. Such an approach would satisfy objectors who are concerned that the plan lacks certainty in respect of the quantity and location of affordable housing provision. Leaving a significant element of the supply of affordable housing to windfall sites provides the LPA with no mechanism to steer such provision to the areas that have been identified as being in most need of this. The windfall schemes envisaged under DD Policy CH3 would be for 100% affordable housing. They would not, therefore, benefit from the cross-subsidy of a scheme which contains market housing. Unless they could be supported by a finance provider they would not deliver any dwellings at all. The budgetary cycles of funding agencies depend on certainty of investment. They can't cope with uncertainty as to whether or not a site will be developable.

38. The use of formal allocations would also increase the degree of certainty that particular areas would be developed during the plan period and, as an aspect of this, by giving guidance to service providers, the likelihood that necessary infrastructure will be in place by the time a development project is formulated. The making of specific formal allocations for 100% affordable housing would also allow the Development Boundaries to be drawn tightly around the built-up areas of settlements at the points where allocations are not made. This would ensure, as an objector argues, that Rural Exception windfall affordable housing sites, although beyond the Development Boundary, are really on land adjoining the settlements as TAN2 (paragraph 10.13) advises. As UDP Policy CH6 stands, Rural Exception Sites are those that directly adjoin the Development Boundary of Villages and Local Centres. When such boundaries are loosely drawn that means that Rural Exception Sites could be approved in places where they do not actually adjoin the built-up area.

39. PPW (paragraph 9.2.15) advises that, where LPAs have demonstrated the need for affordable housing, they should include policies for this in their development plans for the area where need has been identified. The LPA says that

there is a need for affordable housing throughout the plan area but its own Local Housing Market Assessment of July 2000 showed that the highest demand and greatest shortfall were in the Bangor, Caernarfon and Porthmadog areas. The making of formal allocations for affordable housing would allow the LPA to conform to PPW advice by adjusting the provision according to demand. It could, as it says is necessary, make allocations throughout the plan area but make proportionally more in the places of identified need. The 'loose Development Boundaries approach' with its pseudo-allocations, does not enable it to conform to PPW advice because it provides no opportunity for the necessary steerage, via the development plan, to the parts of the UDP which are in greatest need.

40. The allocation approach would, furthermore, enable the LPA to have regard to particular local circumstances, e.g. the existence in the post-industrial villages of cheaper terraced houses. In such places the allocations could deliberately emphasise the provision of affordable housing to meet particular niche demands, e.g. for dwellings to accommodate larger households.

*The merits of further residential development in Rural Villages*

41. The LPA proposes, via Policy CH4, that a certain amount of residential development will be permitted within settlements classified as Rural Villages, provided it is limited to affordable housing to meet a demand arising within a limited spatial area defined by the term 'Community Local Need'. Objectors variously argue that further residential development of any sort is inappropriate in these locations or that a greater quantity of new housing could sustain local community services.

42. PPW (paragraph 9.2.21) advises that new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development, must be strictly controlled. It also notes that many parts of the countryside have isolated groups of dwellings. Sensitive in-filling of small gaps or minor extensions to such groups may be acceptable but much depends on the character of the surroundings, the pattern of development and the accessibility to main towns and villages. The UDP therefore, has an important role in deciding whether particular areas should be regarded as settlements.

43. The criteria for defining a Rural Village are set out in an inquiry Background Paper. In that document it is explicitly stated that Rural Villages do not contain a sufficient supply of services or facilities. There seems to me to be no sound basis to believe that development within Rural Villages will sustain essential services, given the present inadequacy of such provision. In terms of sustaining community vitality they are indistinguishable from other sporadic groups and isolated dwellings that are scattered within many parts of the Plan area's countryside – whilst they form part of rural communities they lack the physical attributes that comprise settlements.

44. From an examination of the proposed Rural Villages it is clear to me that their definition and selection is purely arbitrary. There is no consistency of approach to the inclusion or exclusion of dwellings within them from one Rural Village to the next. They have none of the characteristics of a settlement but, instead, are simply sporadic residential developments in the open countryside.

45. Policy CH4 effectively promotes development in the open countryside, contrary to the advice of PPW, with no tangible benefit in terms of cultural cohesion. The particular nature of the UDP area, with its multiplicity of sporadic, loosely grouped residential properties, makes it particularly vulnerable to the urbanisation of the rural landscape. The number of the proposed Rural Villages, and the level of development envisaged for each one, would result in a scale of house building which would simply continue and reinforce the past unsustainable pattern of development to which I have referred in the section of this report which relates to Policy CH1.

46. The concept of Community Local Need applies a test which relates to the length of residence in defined areas. It would allow the LPA to apply a more selective approach to development in the Rural Villages than in the Local Centres and Villages. It would ensure that the development opportunities that would arise in such settlements would be reserved to meet demand from within the immediate locality, thereby protecting the more sensitive character of such communities in terms of social, cultural and linguistic factors. The LPA was, however, at the relevant RTS, unable to point to any specific research which demonstrated the nature or the extent of these differences. Furthermore, during a hearing the LPA accepted that as some Rural Villages shared the same Community Council as parts of the largest built-up areas of the Plan area, these urban dwellers would qualify to reside in these 'settlements' in the countryside. I conclude that the concept of Community Local Need lacks a convincing justification. It simply adds a layer of complication to the plan which is based on intuition rather than information.

47. This, together with my conclusion on the harmful effects of the policy on the prospect for achieving a sustainable pattern of settlement, convinces me that proposed Policy CH4 should be deleted from the plan and that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. I appreciate that the local planning authority regards the provision of affordable housing in Rural Villages as meeting a local need. However, given my conclusions on the overall relationship between the requirement for, and supply of, land for housing in the section of this report which relates to Policy CH1 and the scope for affordable housing to arise via the formal allocations and the rural exception sites for this purpose, to which I refer earlier in this section, there is no justification for any compensatory provision to replace that lost by the deletion of Policy CH4.

*The merits of removing permitted development rights from affordable homes permitted under policies CH3 and CH4*

48. The DD versions of Policies CH3 and CH4 refer to the abolition of permitted development rights from dwellings built as affordable homes. Welsh Office Circular 35/95, in relation to planning conditions, advises that the freedom provided by the mechanisms of permitted development should be removed only in exceptional circumstances, and then only where serious effects on amenity would result without this. There is no particular dispensation for affordable housing. Objectors argue that this means that the removal of permitted development rights must be justified in particular cases and not imposed as a blanket ban. They also draw attention to a potential conflict with DD Policy C5 (8) 'Building in a Sustainable Manner' which recognises the value of providing lifetime buildings that can be re-used or easily adapted for future use.

49. NA 155 and NA 156 propose to replace the reference to the abolition of permitted development rights with one to the use of a planning condition to control permitted development rights. Such a condition, to be valid, would have to conform to the advice of Circular 35/95, including that it should be necessary, relevant to planning, relevant to the development to be permitted and reasonable in all other respects. I conclude that this would provide sufficient scope for interested parties to argue that such a condition was or was not justified in a particular case. Even if permitted development rights were withdrawn by condition it would still be open to a person to apply for planning permission to extend their home. The policy proposed via NA 192 would provide the basis for the necessary control.

50. An objector argues that the wording of DD Policy CH3 that would require that an obligation be attached to a planning permission to restrict the occupancy of the affordable dwelling uses inappropriate terminology. A planning condition and/or one of several forms of planning obligation could be used. The LPA agrees and, via NA 155, proposes to re-word criterion 3 of Policy CH3 to introduce more general wording which secures this. I conclude that this conforms to the advice of TAN2 (paragraph 12.1).

#### *The framework of Government guidance*

51. In relation to the Rural Exception Sites which would be controlled by Policy CH6, an objector argues that such development would extend settlements into the countryside contrary to the objective of the UDP to provide effective protection for the environment. Such a policy approach is, however, explicitly promoted by PPW (paragraphs 10.13 and 10.14).

52. Another objector argues that Rural Exception Sites immediately beyond the edge of settlements should be approved only after the scope for the development of sites within them is exhausted. TAN2 (paragraph 10.13) advises that Rural Exception Affordable Housing can be built on land within or adjoining existing rural settlements. It does not advise that one sort of site should have precedence over the other. For this reason it would not be appropriate to secure this, as proposed by a criterion of policy CH6 as subject to NAP 73.

53. An objector argues that it is wrong for policy CH3 (as proposed to be changed by NA 155) to rely on Supplementary Planning Guidance (SPG) for its consistent implementation. Unitary Development Plans – Wales (paragraphs 2.12 to 2.16) advises that UDP policies should avoid excessive detail. LPAs should, therefore, consider the use of SPG as a means of setting out more detailed guidance on the way in which the policies of a UDP will be applied in particular circumstances or areas.

54. An objector argues that the proposals of the UDP in respect of affordable housing are restrictive to the extent that they breach the provisions of the Human Rights Act. This is a matter for a court to decide. I have been guided in the preparation of this report by the advice of PPW and TAN2.

55. An objector notes that the reference in DD paragraph 5.2.14 to Circular 6/98 is not appropriate because this guidance relates only to England. The LPA agrees and, via NA 154, proposes to delete this. I agree that this is necessary to secure the procedural integrity of the plan.

*The comprehensibility of the plan*

56. An objector argues that the understanding and consistent implementation of the plan would be enhanced if the table in paragraph 5.2.1 was changed to ensure that sites considered appropriate for affordable housing are not required for other uses and that the issues raised in paragraph 5.2.31 are considered. The LPA agrees and, via NA 152, proposes to cross refer policy CH3 to the key generic policies B21, B22, B24 and CH31. I conclude that this would secure that the necessary attention is given to relevant considerations.

57. An objector expresses concern that Policy CH3 would prevent the construction of an affordable dwelling which took the form of a single storey 3-bedroom house. There is nothing in the policy to prevent the erection of particular dwelling designs. The policy deals with the nature of the site (windfalls), then location (within the Development Boundaries of Local Centres and Villages), nature of the housing need to be satisfied (General Local Need Affordable Housing) and the means of securing this latter aspect in perpetuity. Criterion 2 (as subject to NA 155) simply requires that the size, layout, design and materials be proportional to the specific need for an affordable home.

58. An objector draws attention to the fact that at proposed Pre-inquiry Change stage, within Policies CH3 and CH4, criteria which are intended to achieve an identical purpose are worded in different ways. He also notes typographical errors. The LPA does not propose a Further Proposed Change to address these. It does, however, undertake to apply corrections at a later stage. If my recommendation in relation to Policy CH4 is accepted this will resolve the problem of inconsistent wording.

59. An objector notes that criterion 2 of DD Policy CH6 lacks clarity. The LPA agrees and, via NA 158, proposes to replace it to the effect that 'the development will form a reasonable extension to the Village or Local Centre'. I conclude that this is an appropriate form of wording.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0441) that the DD be modified by the adoption of the terms 'Social Rented Housing', 'Intermediate Housing' and 'Market Housing' as appropriate in accordance with the definition of these which is presented within TAN2;**

**(REC.0442) that the DD be modified to confirm that the 130 dwelling per year estimate of the need for new affordable dwellings relates to Gwynedd as a whole and that the estimate for the UDP area is 105 dwellings;**

**(REC.0443) that the DD be modified by the re-drawing of the Development Boundaries of the settlements in the Local Centre and Village categories so that they follow the actual edge of the consolidated built-up area (except at the points where specific housing allocations are made) and exclude areas of open countryside;**

**(REC.0444) that the DD be modified to secure the deletion from Policy CH3 of the requirement that the whole capacity of windfall sites within the Development Boundaries of Local Centres and Villages be for General Local Need Affordable Housing and require, instead, that a proportion of the housing capacity of each site (to be determined by negotiation with the developer) should be for this;**

**(REC.0445) that the DD be modified to confirm that the requirement to demonstrate that a development will meet an identified need for affordable housing which arises within a specific geographical area as defined by the term 'General Local Need' in the DD be limited to developments within settlements classified as Villages. This term should be changed from 'General Local Need' to simply 'Local Need' but keep the same spatial definition. In all other settlements, although a percentage of affordable housing should be required on qualifying allocated and windfall sites, there should be no restriction on the geographical origin of potential occupiers;**

**(REC.0446) that the LPA reviews the need for sites to be developed for 100% affordable housing and, if these can be justified, that the DD be modified by the making of formal allocations for these;**

**(REC.0447) that the DD version of policy CH5 be modified by the acceptance of NA 157 subject to the proviso that both the threshold capacity of sites above which an element of affordable housing will be required, and also the site specific percentage of this, shall be regarded as indicative and be the subject, in every case, of negotiation between the LPA and the developer at planning application stage having regard to the economics of site development;**

**(REC.0448) that the DD be modified by the acceptance of NA 157 insofar as it relates to the reference within paragraph 5.2.38 to the details of indicative targets for affordable housing within Appendix 3 and the development briefs;**

**(REC.0449) that the DD be modified by the acceptance of NA 152 insofar as it relates to the cross references to Policy CH3;**

**(REC.0450) that the DD be modified to remove the requirement that at least 1% of the ownership of affordable dwellings be transferred to the local authority in accordance with NA 154;**

**(REC.0451) that the DD be modified by the deletion of Policy CH4;**

**(REC.0452) that the DD be modified by the acceptance of NA 154 insofar as it relates to the insertion of the criteria in paragraph 5.2.17 which relates to the unsuitability of an existing dwelling;**

**(REC.0453) that the DD be modified by the acceptance of NA 154 insofar as it relates to the deletion of the reference to Circular 6/98;**

**(REC.0454) that the DD be modified by the acceptance of NA 155 insofar as it introduces criterion 3 to Policy CH3;**

**(REC.0455) that the DD be modified by the acceptance of NA 155 and NA 156 insofar as these relate to the control of permitted development rights;**

**(REC.0456) that the DD be modified by the acceptance of NA 158 insofar as it relates to criterion 2 of Policy CH6;**

**(REC.0457) that the DD be modified by the acceptance of NA 192;**

**(REC.0458) that no other modification be made to the DD in response to these objections.**

**POLICY CH3 – NEW DWELLINGS ON UNDESIGNATED INFILL SITES WITHIN THE DEVELOPMENT BOUNDARIES OF LOCAL CENTRES AND VILLAGES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA155

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/727/3</b>	<b>Cyng. Dafydd Glyn Owen</b>		<b>RTS</b>
<b>B/734/131</b>	<b>Welsh Assembly Government</b>		<b>508</b>
<b>B/832/3</b>	<b>Selwyn Hughes</b>		<b>RTS</b>
<b>B/871/4</b>	<b>Robyns Owen</b>		<b>RTS</b>
<b>B/872/3</b>	<b>Nia Wynne Thomas</b>		<b>91</b>
<b>B/878/3</b>	<b>Balfours</b>		<b>470</b>
<b>B/726/8</b>	<b>Tom Brooks</b>		<b>508</b>
<b>B/867/24</b>	<b>Home Builders Federation</b>		<b>RTS</b>
<b>B/734/133</b>	<b>Welsh Assembly Government</b>		<b>508</b>
<b>B/839/3</b>	<b>Sally Miles</b>	<b>RPS Planning</b>	<b>RTS</b>
<b>B/734/132</b>	<b>Welsh Assembly Government</b>		<b>508</b>
<b>B/930/6</b>	<b>Dishland Ltd</b>	<b>Derek Prosser Associates</b>	<b>RTS</b>
<b>B/999/8</b>	<b>Rossisle Development Co Ltd</b>	<b>M.Gilbert, The Planning Consultancy</b>	<b>RTS</b>
<b>B/932/3</b>	<b>Mrs P Owen</b>	<b>Ron Douglas, Douglas Planning</b>	<b>472</b>
<b>B/952/12</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans, Carter Jonas</b>	<b>508</b>
<b>B/952/21</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans, Carter Jonas</b>	<b>508</b>
<b>B/960/6</b>	<b>Mrs Lowri Williams</b>	<b>Charles F Jones &amp; Son</b>	<b>169</b>
<b>B/586/1</b>	<b>Dafydd Williams</b>		<b>RTS</b>
<b>B/1026/3</b>	<b>Shirley Williams</b>	<b>Suzanne Williams</b>	<b>RTS</b>
<b>B/1042/3</b>	<b>Owen Davenport Ltd</b>		<b>RTS</b>
<b>B/267/1</b>	<b>Peter &amp; Sharon Wyn Grace</b>		<b>508</b>
<b>B/246/8</b>	<b>Jan Tyrer</b>		<b>RTS</b>
<b>B/983/7</b>	<b>Headland Promotions</b>	<b>Emery Planning Partnership</b>	<b>RTS</b>



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<b>B/1032/8</b>	<b>Mrs C Jones</b>	<b>John Alun Jones</b>	<b>RTS</b>
<b>B/1005/7</b>	<b>British Telecommunication PLC</b>	<b>Mandip Dhillon (RPS)</b>	<b>RTS</b>
<b>B/952/17</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans, Carter Jonas</b>	<b>508</b>

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/911/6</b>	<b>Welsh Development Agency</b>		<b>508</b>
<b>B/922/3</b>	<b>T Banks</b>	<b>Mr Mike Banks</b>	<b>508</b>

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/118/3</b>	<b>Dyfed C Thomas</b>		

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/744/1</b>	<b>Sioned Lewis</b>		
<b>B/603/3</b>	<b>DH Lewis</b>		
<b>B/723/3</b>	<b>William Lewis</b>		
<b>B/921/3</b>	<b>Mr &amp; Mrs H Griffiths</b>	<b>Guy D Evans, Carter Jonas</b>	
<b>B/723/1</b>	<b>William Lewis</b>		
<b>B/745/1</b>	<b>Sian Lewis</b>		
<b>B/743/3</b>	<b>Nia Lewis</b>		

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/2194</b>	<b>Welsh Assembly Government</b>		<b>508</b>
<b>B/726/2022</b>	<b>Tom Brooks</b>		<b>189</b>
<b>B/734/2197</b>	<b>Welsh Assembly Government</b>		<b>508</b>
<b>B/734/2217</b>	<b>Welsh Assmebly Government</b>		<b>508</b>

**Notes**

- The following objections are dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text': B/726/2022, B/734/131,

B/726/8, B/734/133, B/734/132, B/267/1, B/911/6, B/734/2194, B/734/2197, B/734/2217, B/727/3, B/867/24, B/839/3, B/930/6, B/999/8, B/932/3, B/960/6, B/586/1, B/1026/3, B/1042/3, B/246/8, B/983/7, B/1032/8, B1005/7, B/871/4.

- Objection B/872/3 is dealt with in the section of this report which relates to the alignment of the Development Boundary of Rhostryfan.
- Objections B/932/3 and B/878/3 are dealt with in the section of this report which relates to the alignment of the Development Boundary of Penrhyndeudraeth.
- Objections B/952/17 and B/952/12 are dealt with in the section of this report which relates to the status of settlements in the Bangor DCA.
- Objection B/952/21 is dealt with in the section of this report which relates to the omission of allocations for housing in the Bangor DCA.
- Objection B/922/3 is dealt with in the section of this report which relates to proposed housing land allocations in the Llyn DCA.

**POLICY CH4 – NEW DWELLINGS IN RURAL VILLAGES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA156

This Section is subject to Further Proposed Changes Nos: NAP59

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/246/6	Jan Tyrer		RTS
B/1219/1	Peter Williams		509
B/952/26	RCH Douglas Pennant	Guy D Evans, Carter Jonas	RTS
A/138/1	Guy Evans		509
B/727/4	Cyng Dafydd Glyn Owen		509
B/197/1	Cyngor Cymuned Pistyll		509
B/952/18	RCH Douglas Pennant	Guy D Evans, Carter Jonas	509
B/924/1	Lord Newborough	Guy D Evans, Carter Jonas	RTS
B/952/13	RCH Douglas Pennant	Guy D Evans, Carter Jonas	509
B/734/134	Welsh Assembly Government		509
B/734/135	Welsh Assembly Government		509
B/734/136	Welsh Assembly Government		509
B/756/46	Environment Watch Wales & Borders		150
B/871/5	Robyns Owen		RTS
B/867/25	House Builders Federation		RTS
B/726/9	Tom Brooks		509
B/288/4	Andrew Foskett		477
B/288/5	Andrew Foskett		477
B/683/1	Alison Jones		509

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
B/24/1	Llinos Jones		

<b>B/870/34</b>	<b>Sustainable Gwynedd Gynladwy</b>		
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### Objections to Pre-Inquiry Proposed Changes

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/2195</b>	<b>Welsh Assembly Government</b>		<b>509</b>
<b>B/734/2198</b>	<b>Welsh Assembly Government</b>		<b>509</b>
<b>B/952/2036</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans (Carter Jonas)</b>	<b>509</b>
<b>B/924/2023</b>	<b>Lord Newborough</b>	<b>Guy D Evans (Carter Jonas)</b>	<b>509</b>

### Notes

- The following objections are dealt with in the section of this report which relates to 'Affordable Housing for Local Needs Text': B/756/46, B/1219/1, A/138/1, B/727/4, B/197/1, B/734/134, B/734/135, B/734/136, B/726/9, B/683/1, B/734/2195, B/734/2198, B/952/2036, B/924/2023, B/246/6, B/952/26, B/924/1, B/871/5, B/867/25.
- Objections B/288/4 and B/288/5 are dealt with in the section of this report which relates to the status of settlements within the Lllyn DCA.
- Objections B/952/18 and B/952/13 are dealt with in the section of this report which relates to the status of settlements in the Bangor DCA.

**POLICY CH5 – AFFORDABLE HOUSING WITHIN DEVELOPMENT BOUNDARIES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA157

This Section is subject to Further Proposed Changes Nos: NAP47; NAP48; NAP49; NAP50; NAP57

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/727/5	Councillor Dafydd Glyn Owen		518
B/756/47	Environment Watch Wales & the Borders		151
B/867/26	House Builders Federation		RTS
B/931/3	Mountain Rangers Sports & Social Club		518
B/1005/8	British Telecommunications PLC	Mandip Dhillon (RPS)	RTS

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/138	Welsh Assembly Government		518
B/734/137	Welsh Assembly Government		518
B/911/7	Welsh Development Agency		518
B/870/35	Sustainable Gwynedd Gynladwy		518

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/767/10	Friends of the earth (Môn & Gwynedd)		
B/844/33	CPRW		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
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<b>B/771/1</b>	<b>Gruffudd Eifion Owen</b>		
<b>B/1030/1</b>	<b>University of Wales Bangor</b>	<b>Sian Kilner, Kilner Planning</b>	
<b>B/589/1</b>	<b>Wyn Hobson</b>		
<b>B/107/3</b>	<b>Owain Rowlands</b>		
<b>B/553/4</b>	<b>Christopher William Jones</b>		

### Objections to Pre-Inquiry Proposed Changes

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/867/2033</b>	<b>House Builders Federation</b>		<b>518</b>
<b>B/756/2100</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>158</b>
<b>B/322/2012</b>	<b>Morbaine Ltd</b>		<b>518</b>

### Notes

- The following objections are dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text': B/756/47, B/756/2100, B/727/5, B/734/138, B/870/35, B/734/137, B/911/7, B/867/2033, B/322/2012, B/867/26, B/1005/8.
- Objection B/931/3 is dealt with in the section of this report which relates to the omission of housing allocations at Rhosgadfan.

**POLICY CH6 – AFFORDABLE HOUSING ON RURAL EXCEPTIONS SITES DIRECTLY ADJOINING THE BOUNDARIES OF VILLAGES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA158

This Section is subject to Further Proposed Changes Nos: NAP73

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/727/6	Councillor Dafydd Glyn Owen		510
B/726/10	Tom Brooks		188
B/246/1	Jan Tyrer		RTS
B/575/4	Aberdaron Community Council		510
B/1005/9	British Telecommunications	Mandip Dhillon (RPS)	RTS

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/15	CPRW		510
B/734/139	Welsh Assembly Government		510

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/140	Welsh Assembly Government		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/725/3	Keith Owen Price		
B/581/3	Abersoch Golf Club		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2101	Environment Watch Wales & the Borders		159

**Note**

- The following objections are dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text': B/756/2101, B/726/10, B/727/6, B/575/4, B/844/15, B/734/139, B/246/1, B/1005/9.



**POLICY CH7 – NEW DWELLINGS IN OPEN COUNTRYSIDE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA159

This Section is subject to Further Proposed Changes Nos: NAP10; NAP14

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/961/1</b>	<b>British Holiday &amp; Home Parks Assoc. Ltd, Gwynedd &amp; Mon Branch</b>	<b>Charles F Jones &amp; Son</b>	<b>49</b>
<b>B/959/5</b>	<b>Mr K Salisbury</b>	<b>CDN Planning</b>	<b>513</b>
<b>B/1042/1</b>	<b>Owen Davenport Ltd</b>		<b>49</b>
<b>B/734/142</b>	<b>Welsh Assembly Government</b>		<b>513</b>
<b>B/734/141</b>	<b>Welsh Assembly Government</b>		<b>49</b>
<b>B/575/12</b>	<b>Aberdaron Community Council</b>		<b>513</b>
<b>B/871/6</b>	<b>Robyns Owen</b>		<b>118</b>
<b>B/801/3</b>	<b>Welsh Agricultural Union</b>		<b>49</b>
<b>B/870/36</b>	<b>Sustainable Gwynedd Gynaladwy</b>		<b>49</b>
<b>B/733/1</b>	<b>Margaret Shakespeare</b>		<b>49</b>
<b>B/724/1</b>	<b>Chris Dixon</b>		<b>49</b>

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/37</b>	<b>Sustainable Gwynedd Gynaladwy</b>		

## Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2102	Environment Watch Wales & the Borders		160
B/733/2004	Margaret Shakespeare		49
B/724/2004	Chris Dixon		49

### Notes

- Objection B/756/2102 is responded to in LPA proof 49 not 160.
- Objection B/871/6 is dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text'.

### Main Issues

- The promotion of a sustainable pattern of settlement.
- The scope of the policy.
- The potential for affordable dwellings in the countryside.
- The scope for redevelopment of land beyond the edge of settlements.
- The accommodation needs of caravan site wardens.

### Inspector's Considerations and Conclusions

#### *The promotion of a sustainable pattern of settlement*

1. DD Policy CH7 provides that proposals to build new dwellings in the countryside will be refused unless there is a genuine need to maintain and support activities on a well established agricultural or forestry unit. It will be necessary for proposals to conform to stated criteria.

2. Objectors argue that the UDP should provide much greater scope for the development of dwellings in rural areas when these are associated with cottage industries. Such an arrangement would, as the objectors suggest, minimise the travel to work journeys of those working in those occupations. Individuals and families do, however, require access to a much wider range of facilities, services and opportunities than work alone. The need to gain access to schools, shops, health facilities and entertainment would stimulate lengthy trips. To the extent that a frequent bus service giving access to a wide range of destinations was not available, this would stimulate the use of the private car contrary to PPW advice.

3. Such schemes, because of their location, would promote an unsustainable pattern of settlement even if, as the objectors argue, they would be of low impact design, constructed of locally available recyclable materials. Their location, remote from settlements, would, contrary to the objectors' view, give them a significant ecological footprint. The objectors argue that low impact dwellings would use only sustainable materials and techniques in their construction and that consideration should be given to the use of planning conditions to secure that they are removed if their occupation ceases. It is, however, their proposed location within the open

countryside, rather than their materials and design, that is unacceptable in strategic terms.

4. The same objectors argue that priority should be given to such schemes if they are to be occupied by local people. The planning system should not discriminate between individuals in that way. They also seek the devolution of Local Planning Authority functions to the Community Councils. Matters relating to the structure of local government lie outside the scope of this inquiry.

*The scope of the policy*

5. Objectors interpret the DD version of Policy CH7 as limiting the possibility that new dwellings might be permitted in the countryside to those that serve agricultural and forestry units. PPW (paragraph 9.3.6) advises that isolated new houses in the open countryside require special justification. Dwellings which are essential to enable farm or forestry workers to live at or close to their place of work are referred to simply as examples. The LPA agrees, and, via NA 159 as subject to NAP 10 and NAP 14, proposes to widen the scope of the policy so that it applies not only to dwellings required for full time workers mainly employed in agriculture or forestry, but also those mainly employed in other rural land-based industries or those who earn their living through a full-time activity that provides an essential service to agriculture or forestry. I conclude that this brings the policy into conformity with PPW advice.

6. Because NAP 10 and NAP 14 have not been the subject of public consultation a full debate on their merits has not been possible. If the LPA wishes to pursue these aspects it should do so via the modification procedure.

7. An objector argues that within criterion 4 of the proposed changed policy the word 'unit' should be followed by the words 'within the complex'. It is clear, however, from the structure of the policy that the word 'unit' refers to the farm, forestry or business unit. Such additional wording would therefore be otiose.

*The potential for affordable dwellings in the countryside*

8. An objector argues that the UDP should provide the scope for single affordable dwellings to be constructed in the countryside. PPW (paragraph 9.3.6) advises that new house building in the open countryside away from established settlements should be strictly controlled. In paragraph 9.2.22 it does, however, envisage the residential development of Rural Exception Sites adjoining existing rural settlements for affordable housing. Such provision is made by policy CH6 of the DD.

*The scope for redevelopment of land beyond the edge of settlements*

9. An objector argues that DD policy CH7 would preclude the redevelopment of previously developed land beyond the Development Boundaries of settlements. PPW (paragraph 2.7.1) advises that not all previously developed land is suitable for development. This may be, among other things, because of its location. PPW (paragraph 9.3.6) advises that new house building or other new development in the open countryside away from established settlements should be strictly controlled. It is, therefore, quite appropriate for the LPA to have regard to the relationship of particular sites to the consolidated built-up areas of settlements.

The definition of Development Boundaries in the plan will enable consistent decision making in this respect. Policy C3 deals specifically with the re-use of previously developed sites.

*The accommodation needs of caravan site wardens*

10. An objector argues that most existing caravan sites are located in the open countryside and require, in many instances, the year round presence of a warden or manager. In order to attract and retain the best staff it is considered necessary to provide living accommodation in a permanently constructed dwelling on or near the site. PPW (paragraph 9.3.6) advises that new house building in the open countryside should be strictly controlled. The special justification referred to is subject to the caveat that there should be an absence of near-by accommodation. Such sites do, by definition, have accommodation in the form of caravans, chalets and cabins.

11. This same objector, in relation to his objection B/961/3 to paragraphs 5.2.72 and 5.2.73 of the DD, argues that 'caravans manufactured to BS3632 are designed for all weather conditions in the UK. If these are provided there is no reason why they cannot be lived in all year round by caravan site wardens'. There is, therefore, no justification for a permanent dwelling so long as caravans conforming to this standard are provided. DD policy CH15 provides for the permanent occupation of static caravans, chalets or cabins by a site warden.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0459) that the DD be modified by the acceptance of NA 159 as proposed to be further modified by NAP 10 and NAP 14;**

**(REC.0460) that no other modification be made to the DD in response to these objections.**

## POLICY CH8 – SECOND HOMES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA160; NA161

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/871/7	Robyns Owen		118
B/726/11	Tom Brooks		511
B/867/27	House Builders Federation		511
B/867/1	House Builders Federation		511
B/246/4	Jan Tyrer		511
B/1032/9	Mrs C Jones	John Alun Jones	511
B/983/8	Headland Promotions	Emery Planning Partnership	511

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/143	Welsh Assembly Government		511

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/32	CPRW		
B/734/144	Welsh Assembly Government		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/38	Sustainable Gwynedd Gynladwy		

### Main Issue

- Whether the DD is appropriate, having regard to the scope for consistent implementation of policy.

## **Inspector's Considerations and Conclusions**

1. DD policy CH8 provides that proposals for new dwellings that would lead to an increase in the number of second homes, in a community where these already form a high proportion of the housing stock, will be refused. The supporting text (paragraph 5.2.54) informs that second homes, holiday homes or summer residences are all regarded as the same. The LPA proposes via NA 160 and NA 161 to modify part of the supporting text and to delete a further part of this.
2. Objectors argue variously that the policy is not sufficiently strong and should provide a more rigorous barrier to the construction of second homes or that its objectives can be achieved only if the Town and Country Planning (Use Classes) Order 1987 is changed so as to place second homes in a separate category from homes occupied as a principal dwelling.
3. Because it would not be possible to know with any reasonable degree of certainty at the time a planning application was determined whether a particular dwelling would or would not be occupied at some point in the future as a second home the LPA would not know which planning applications to refuse and which to approve. The policy would not, therefore, contribute to a framework for rational and consistent decision making as 'Unitary Development Plans – Wales' (paragraph 1.12) requires.
4. If granted planning permission because the LPA was satisfied that it was to be occupied as the main home of a household, a dwelling could at a later date be sold and occupied as a second home without the need for any further planning permission. A planning condition requiring that it be occupied solely as the main home of a household could not be enforced because, at the scale of the LPA area, it would require a level of detailed monitoring and analysis of the comings and goings of a multiplicity of occupiers which could not be maintained in practice. It would, therefore, not conform to the advice of Welsh Office Circular 35/95. For all these reasons I conclude that policy CH8 should be deleted from the plan.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0461) that the DD be modified by the deletion of policy CH8;**

**(REC.0462) that NA 160 and NA 161 be not accepted;**

**(REC.0463) that no other modification be made in response to these objections.**

**POLICY CH9 – CONVERSION OF BUILDINGS WITHIN DEVELOPMENT BOUNDARIES FOR RESIDENTIAL USE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA162; NA163; NA164

This Section is subject to Further Proposed Changes Nos: NAP60

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1032/10	Mrs C Jones	John Alun Jones	512
B/1005/10	British Telecommunications PLC	Mandip Dhillon (RPS)	512
B/1042/5	Owen Davenport Ltd		512
B/246/3	Jan Tyrer		RTS
B/575/13	Aberdaron Community Council		512
B/960/7	Mrs Lowri Williams	Charles F Jones & Son	512

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/20	Chris Wynne North Wales Wildlife Trust		
B/575/15	Aberdaron Community Council		
B/790/21	Gwynedd Archaeological Truat		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/154/3	Sue Cooper		

**Note**

- Objection B/575/15 is now said by the LPA to be not unconditionally withdrawn. It is responded to by LPA proof 651 and is dealt with in this section.

## Main Issues

- The framework of national policy advice.
- The period for marketing as holiday accommodation.
- The role of Aberdaron as a tourism venue.

## Inspector's Considerations and Conclusions

### *The framework of national policy advice*

1. DD policy CH9 provides that proposals to convert buildings for residential use within the Development Boundaries of settlements will be approved provided, among other things, that if the building is located in an Area Centre, Local Centre or Village there must be proof of a General Local Need for an Affordable Dwelling. The term 'Area Centre' is not one used by the LPA in its categorisation of the settlement hierarchy. The LPA proposes to delete this wording via NA 162 and NAP 60. These changes will promote the internal consistency of the plan and are incorporated within my Recommendations.

2. Objectors argue that the restriction of planning permission to schemes which meet a genuine local need for affordable housing does not accord with the advice of PPW. For the reasons I give in paragraph 26 of the section of this report which relates to 'Affordable Housing for Local Need Text' I agree with them insofar as it relates to settlements that are higher in the hierarchy than Villages. Those arguments apply equally to new dwellings which arise from the development of land and the conversion of existing buildings. For these reasons I conclude that criterion 1 of policy CH9 should be modified and that the final paragraph of the policy should be re-worded so as to remove the reference to the occupancy of dwellings in Local Centres only by those who have a General Local Need for Affordable Housing.

### *The period for marketing as holiday accommodation*

3. The second criterion of policy CH9 requires that the conversion scheme does not lead to the loss of serviced holiday accommodation in any of the main holiday centres listed in the supporting text. An exception is to be made if firm evidence is submitted that the property has been marketed unsuccessfully as holiday accommodation for sale for a continuous period of twelve months. An objector argues that this is an insufficient period but does not suggest an alternative. In my view extending the period of vacancy beyond twelve months would risk causing blight to its immediate surroundings in circumstances where the image of the area is a vital aspect of its attraction as a holiday resort.

### *The role of Aberdaron as a tourism venue*

4. An objector argues that Aberdaron should be included in the list of holiday settlements referred to in DD paragraph 5.2.59. The LPA agrees and proposes to secure this via NA 164. I conclude that this will satisfy the concerns of the objector.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0464) that the DD be modified by the deletion of "one of the Area Centers [sic], Local Centers or" from criterion 1 of policy CH9;**

**(REC.0465) that the DD be modified by the deletion of "Area Centres, Local Centres or" within the final paragraph of policy CH9;**

**(REC.0466) that the DD be modified by the acceptance of NA 164;**

**(REC.0467) that no other modification be made to the DD in response to these objections.**

**POLICY CH10 – CONVERSION OF BUILDINGS IN RURAL VILLAGES AND IN OPEN COUNTRYSIDE FOR RESIDENTIAL USE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA165

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/790/22</b>	<b>Gwynedd Archaeological Trust</b>		<b>30</b>
<b>B/773/21</b>	<b>Chris Wynne (North Wales Wildlife Trust)</b>		<b>30</b>
<b>B/801/4</b>	<b>Welsh Agricultural Union</b>		<b>30</b>
<b>B/1005/11</b>	<b>British Telecommunications Plc</b>	<b>Mandip Dhillon (RPS)</b>	<b>514</b>

**Main Issues**

- The framework of national planning policy.
- The relationship to other UDP policies.

**Inspector's Considerations and Conclusions**

*The framework of national planning policy*

1. DD Policy CH10 provides that in Rural Villages and the open countryside the conversion of buildings to residential use will not be permitted without the applicant first providing proof that a suitable economic use cannot be secured for the building. A planning application for such a scheme would have to satisfy stated criteria. The first of these, and the third part of the policy, relate to the demonstration of a Local Community Need for an Affordable House and the arrangements to be made to secure this in perpetuity. The LPA proposes NA 165 to improve the clarity of the relevant wording and to relocate the reference to affordable housing from the third part of the policy to a new criterion 4.

2. Objectors argue that the criterion that a Local Community Need for Affordable Housing must be demonstrated is too restrictive. They consider that it would prevent beneficial redevelopment. PPW (paragraph 7.6.10) advises that the contribution made by the conversion of a rural building to meeting an identified need for affordable housing for local need can justify such action even in areas where the creation of local employment is a priority. This element of the Policy should, therefore, not be regarded as unduly restrictive. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I have concluded that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. If my recommendation on this matter is accepted it will be necessary to remove the

reference to Rural Villages from the heading and text of policy CH10 and from any other points where it occurs within the plan.

6. Objectors argue that it should not be necessary to demonstrate that a suitable economic use cannot be secured for the building before conversion for residential use is approved. PPW (paragraph 7.6.9) advises that the re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development as well as for tourism, sport and recreation. LPAs should adopt a positive approach to the conversion of rural buildings for business use. This supports the approach taken by the LPA in relation to this aspect of Policy CH10.

*The relationship to other UDP policies*

8. Objectors argue that, when a planning application for the conversion of a rural building is determined, consideration should be given to the protection of the historic and traditional aspects of the original structure and provision made for the care of protected species. The plan should be read as a whole. Criterion 4 of policy C4 provides for the retention of any inherent traditional historic or architectural features of the building. Policy B19 secures protection for species and their habitats that are of international, national and local importance.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0468) that the DD be modified by the acceptance of NA 165 subject to the deletion of the references to Rural Villages from the heading and text of Policy CH10, and from all other points where this term is used within the plan.**

**(REC.0469) that no other modification be made to the DD in response to these objections.**

**POLICY CH11 – DEMOLITION AND RECONSTRUCTION OF DWELLINGS IN RURAL VILLAGES AND IN THE COUNTRYSIDE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA166; NA152

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1032/11	Mrs C Jones	John Alun Jones	515
B/801/5	Farmers Union of Wales		37
B/756/48	Environment Watch Wales & the Borders		152
B/575/16	Aberdaron Community Council		515
B/683/3	Alison Jones		515

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/22	Chris Wynne (North Wales Wildlife Trust)		515
B/790/23	Gwynedd Archaeological Trust		515
B/776/17	Environment Agency Wales		515

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/773/2048	Chris Wynne		

**Note**

- Objection B/756/48 is dealt with in the section of this report which relates to Policy CH12.

**Main Issues**

- The definition of a dwelling house.
- Alternatives to demolition.

- The comparability of the new and the old buildings.
- The need to secure demolition.
- The relationship to other UDP policies.

## **Inspector's Considerations and Conclusions**

### *The definition of a dwelling house*

1. DD Policy CH11 provides that proposals to demolish a dwelling or dwellings that are in poor condition in Rural Villages or in the countryside and to develop new living units on the site will be approved provided that they conform to stated criteria. The first of these is that the existing building is actually a dwelling house.

2. An objector argues that the policy should contain a definition of the term 'dwelling house'. This is not necessary because relevant Government circulars are part of the framework of advice to which regard must be had when LPAs determine planning applications. Circular 03/2005 (paragraphs 69 to 71) confirms that the term 'dwelling house' is not defined in the Use Classes Order. The question of whether a particular building is a dwelling house is, therefore, one of fact. The common feature of all premises which can generally be described as dwelling houses is that they are buildings that ordinarily afford the facilities for day to day private domestic existence. The criteria for determining whether the use of particular premises should be classified within the C3 (Dwelling Houses Use Class) include both the manner of the use and the physical condition of the premises. This latter aspect of Circular 03/2005 advice confirms that, contrary to the view of several objectors, former dwellings which are now in a ruinous condition should not be regarded as dwelling houses for the purposes of this policy.

### *Alternatives to demolition*

3. The second criterion of Policy CH11 requires that there be no reasonable possibility of repairing, converting or extending the existing building without substantial rebuilding. An objector argues that this approach is not appropriate. PPW (paragraph 9.3.6) advises, however, that new house building and other new development in the open countryside away from established settlements should be strictly controlled. It is, therefore, necessary for the possible use of procedures which do not involve development to be examined before resort is had to action which does.

### *The comparability of the new and the old buildings*

4. The fifth criterion of policy CH11 requires that the new building must not be of a disproportionate size, scale or design compared to the original. An objector argues that the original dwelling might, itself, be out of character with the locality. PPW (paragraph 9.3.6) confirms that it is the character of the area which is the important factor. The LPA agrees and, via NA 166, proposes to incorporate this qualification into the criterion. I conclude that this will bring the policy into conformity with the framework of national planning policy guidance.

### *The need to secure demolition*

5. An objector argues that it is necessary to introduce within Policy CH11 the requirement which is present in Policy B5 that demolition of the existing dwelling

must not take place until a contract has been let which will secure the redevelopment of the site. The LPA agrees and proposes to secure this via NA 166.

6. Policy B5 relates, however, to the demolition of buildings in conservation areas. In such areas individual buildings make a contribution to the character of the locality and it is important to ensure that they are replaced. In the circumstances envisaged by Policy CH11 the existing dwellings are in the countryside. Their complete removal would enhance the essentially open character of the rural area rather than detract from it. It is not, therefore, appropriate to insert this element of NA 166.

*The relationship to other UDP policies*

7. Objectors argue that, when a planning application is determined under this policy, consideration should be given to the care of protected species. The plan should be read as a whole. Policy B19 secures protection for species and their habitats that are of international, national and local importance. NA 152 will insert a cross reference between Policies CH11 and B19.

8. For the reasons I give in the section of my report which relates to 'Affordable Housing for Local Need Text' I have concluded that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. If my recommendation on this matters is accepted it will be necessary to remove the references to Rural Villages from the heading and text of Policy CH11.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0470) that the DD be modified by the acceptance of NA 152;**

**(REC.0471) that the DD be modified by the acceptance of NA 166 only insofar as it relates to criterion 5;**

**(REC.0472) that the DD be modified by the deletion of the references to Rural Villages from the heading and text of Policy CH11;**

**(REC.0473) that no other modification be made to the DD in response to these objections.**

## **POLICY CH12 – CONVERSION OF DWELLINGS INTO FLATS, BED-SITS OR MULTIPLE OCCUPANCY DWELLINGS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA167

### **Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/145</b>	<b>Welsh Assembly Government</b>		<b>516</b>

#### **Note**

- Objection B/756/48 is dealt with in this section.

#### **Main Issue**

- Whether the DD is appropriate having regard to the safeguarding of the Welsh language and culture and the provision of affordable housing.

#### **Inspector's Considerations and Conclusions**

1. DD policy CH12 provides that proposals to change the use of dwellings or other residential buildings into flats, bedsits or multiple occupancy units will be approved only if this would not result in over-provision of this type of accommodation in a specific street or area where this has or could have a harmful effect on social and environmental character.

2. Objectors argue that consideration should also be given to the harmful effect that the provision of second homes, via this process, could have on Welsh language and culture and to the opportunities to secure additional affordable housing. The LPA proposes NA 167 to address these issues. This would add an additional criterion which would require the new dwelling units to provide accommodation to meet General Local Need for Affordable Housing while not leading to an unacceptable increase in the number of second homes in a city, town or Community Council area.

3. PPW (paragraph 2.10.1) advises that the land use planning system should take account of the needs and interests of the Welsh language and, in so doing, contribute to its well being. Paragraph 2.10.3 advises, however, that LPAs cannot seek to control the occupancy of dwellings on linguistic grounds. They can provide for the broad distribution and phasing of housing development, taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Appropriate UDP policies about the broad scale, location and phasing of new development can assist in that aim. I have concluded, in relation to Policy CH1, that the LPAs approach to the broad distribution of housing land allocations is in conformity with this advice.

4. The proposed additional criterion of Policy CH12 would not accord with it, however. The classification of the settlements into those that are or are not likely to be attractive to purchasers from outside Gwynedd is based on some statistical research. A decision about the sort of people who would occupy individual flats within individual streets would be based on pure guesswork. The criterion would not, therefore, provide the basis for consistent decision making as PPW requires. The criterion also qualifies its approach by requiring that the increase in second homes as a result of conversion of a dwelling to flats should not be 'unacceptable'. No guidance is given as to the scale of development that would or would not be acceptable to a decision maker.

5. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' it is clear that national planning policy seeks to promote communities which are mixed in terms of, among other things, housing tenure. There is, therefore, no basis for conversions to flats to be limited to only those which would generate affordable housing. For all these reasons I conclude that policy CH12 should not be modified in accordance with NA 167.

## **RECOMMENDATION**

**I recommend:**

**(REC.0474) that no modification be made to the DD in response to these objections and, in particular, that NA 167 be not accepted.**



## POLICY CH14 – GYPSY SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA168

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/146	Welsh Assembly Government		517

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/756/49	Environment Watch Wales & the Borders		

### Main Issue

- Whether the DD is appropriate, having regard to the mode of policy expression.

### Inspector's Considerations and Conclusions

1. DD Policy CH14 and its supporting text provide the framework for the determination of planning applications for Gypsy sites. The objector argues that the word Gypsies and New Age Travellers should begin with capital letters. The LPA agrees and proposes to secure this via NA 168.

### RECOMMENDATIONS

I recommend:

**(REC.0475) that the DD be modified by the acceptance of NA 168;**

**(REC.0476) that no other modification be made to the DD in response to this objection.**

**POLICY CH15 – PERMANENT RESIDENCY IN CARAVANS, CHALETS AND CABINS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA169

This Section is subject to Further Proposed Changes Nos: NAP55

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/39	Sustainable Gwynedd Gynladwy		41
B/575/17	Aberdaron Community Council		41
B/961/3	British Holiday & Home Parks Assoc. Ltd, Gwynedd & Mon Branch	Charles F Jones & Son	41

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/961/2009	British Holiday & Home Parks Assoc. Ltd, Gwynedd & Mon Branch	Charles F Jones & Son	41

**Main Issue**

- Whether the DD is appropriate having regard to the promotion of a sustainable pattern of settlement.

**Inspector's Considerations and Conclusions**

1. DD Policy CH15 provides that proposals to use static caravans, chalets or cabins for permanent residential use will be refused except in stated circumstances. The LPA, via NAP 55, clarifies that the policy is intended to apply to existing units. Objectors argue that, if constructed to the relevant British Standard and sited correctly, such units could provide comfortable accommodation which could be occupied in all weather conditions. Their ecological footprint might be smaller than that of a conventional dwelling.

2. It is not the constructional quality of the units that is at issue, however, but their location. Most existing caravans, chalets and cabins are normally sited beyond the built-up areas of settlements in the open countryside. PPW (paragraph 9.3.6) advises that new development in the open countryside should be strictly controlled. The permanent occupation of these units would be the equivalent of establishing significant new settlements in the open countryside remote from supporting services. This would stimulate long distance trips to gain access to retail, education, health, leisure and employment opportunities. It would promote an unsustainable pattern of settlement contrary to the advice of PPW (paragraph 9.1.1) and a fragmented pattern of settlement contrary to paragraph 9.3.1.

## **RECOMMENDATION**

**I recommend:**

**(REC.0477) that no modification be made to the DD in response to these objections.**

## POLICY CH16 - AVAILABILITY OF INFRASTRUCTURE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA170

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/147	Welsh Assembly Government		238

### Main Issue

- Whether the DD is appropriate, having regard to the role of non-mains sewerage systems.

### Inspector's Considerations and Conclusions

1. The DD, in policy CH16, provides that planning permission for development will be refused unless there is an adequate provision of necessary infrastructure. Supporting paragraph 5.3.3 informs that, where it is impossible to connect with mains sewerage systems, consideration will be given to private systems. The objector draws attention to the advice of Circular 10/99 that connection to private sewerage systems should be done where connection to the mains system is not feasible in terms of cost and/or practicality. The LPA agrees that it is necessary to incorporate this advice in paragraph 5.3.3 and proposes to secure this via NA 170.

### RECOMMENDATIONS

I recommend:

**(REC.0478) that the DD be modified by the acceptance of NA 170;**

**(REC.0479) that no other modification be made to the DD in response to this objection.**

## POLICY CH18 – TELECOMMUNICATIONS EQUIPMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA171; NA172

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1005/12	British Telecommunications Ltd	Mandip Dhillon (RPS)	134
B/1001/1	Mobile Operators Association	Norman Gillan, Mono Consultants	134

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/6	Network Rail Infrastructure Ltd		134
B/734/149	Welsh Assembly Government		134
B/734/148	Welsh Assembly Government		134

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2103	Environment Watch Wales & the Borders		134

### Main Issues

- The scope of the policy.
- The regard to be had to technical and operational restrictions on siting.
- The implications for decision making of concerns about health.
- The effect of development on highway safety.
- The removal of redundant equipment.

## Inspector's Considerations and Conclusions

### *The scope of the policy*

1. DD policy CH18 provides that proposals for telecommunications equipment will be approved so long as all of the stated criteria are satisfied. An objector emphasises that the relevant considerations as far as a Local Planning Authority is concerned are limited to location and design. The LPA recognises that the role of the UDP policies is to provide the framework for the determination of planning applications in respect of those activities that are defined as development and require planning permission. It, therefore, via NA 171 proposes to qualify the initial wording of the policy to limit its application to those proposals for telecommunications equipment that require a specific grant of planning permission. I conclude that this will secure the necessary distinction between these and those proposals that are permitted development.

### *The regard to be had to technical and operational restrictions on siting*

2. The policy, in criterion 1, provides that telecommunications development must use appropriate existing structures or buildings unless it is clearly proven that this will unacceptably affect its operational effectiveness. An objector argues that this does not sufficiently reflect the technical and operational restrictions faced by operators. PPW (paragraph 12.13.2) advises that the sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case. Use should also be made of existing buildings and other structures to site new antennas. Paragraph 12.12.2 emphasises that attempts to minimise the impact of such installations must be consistent with operational requirements. I consider that the proposed wording of criterion 1, at DD stage, is consistent with this advice. The proposed re-wording of criterion 1 via NA 171 and of the supporting text via NA 172 provide additional emphasis to this aspect and, for that reason, should be accepted.

3. An objector notes that in some circumstances the increase in height and/or bulk of an existing telecommunications installation as a result of mast sharing will have a more harmful impact on the character and appearance of an area, or on amenity, than the erection of an additional mast. Criterion 2, at DD stage, and criterion 1 at Proposed Change stage are drafted with sufficient flexibility to secure that these factors are taken into account.

### *The implications for decision making of concerns about health*

4. Criterion 3 requires that both a statement and also evidence is required from an applicant to confirm that, when installed, the telecommunications equipment will operate in accordance with guidance on public safety. Objectors refer to the advice of PPW (paragraph 12.13.8) that if the development meets the guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP) it should not be necessary for LPAs, in processing an application for planning permission, to consider further the health aspects and concerns about them. The LPA agrees that this is the correct approach and proposes to secure this via NA 171. The proposed changed text of criterion 3 still contains the word 'evidence' however, which could be construed as proof in addition to the production of an ICNIRP certificate. For this reason I consider it necessary to modify the wording of

criterion 3 to limit the requirement upon the applicant to the production of the ICNIRP certificate only.

*The effect of development on highway safety*

5. DD criterion 4 requires that the telecommunications development must be acceptable in terms of highway safety. An objector argues that this is unduly restrictive. The plan must be read as a whole. This matter is dealt with in Policy CH31. In the interests of brevity criterion 4 should be deleted from Policy CH18.

*The removal of redundant equipment*

6. An objector argues that the policy should require that redundant telecommunications equipment is removed when it is no longer needed. Criterion 5 of the DD secures this.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0480) that the DD be modified by the acceptance of NA 171 subject to criterion 3 being worded as follows 'that the development is certified to conform to the ICNIRP guidelines';**

**(REC.0481) that the DD be modified by the acceptance of NA 172;**

**(REC.0482) that the DD be modified by the deletion of criterion 4 of Policy CH18;**

**(REC.0483) that no other modification be made to the DD in response to these objections.**

**POLICY CH19 - SIGNS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/151</b>	<b>Welsh Assembly Government</b>		<b>334</b>
<b>B/734/152</b>	<b>Welsh Assembly Government</b>		
<b>B/734/150</b>	<b>Welsh Assembly Government</b>		



**POLICY CH20 – CYCLING NETWORK, PATHS AND RIGHT O WAY**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA173

This Section is subject to Further Proposed Changes Nos: NAP108

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/18	Aberdaron Community Council		32
B/649/1	Don Mathew		32
B/76/30	Mike Webb (RSPB)		32

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/51	Environment Watch Wales & the Borders		32

**Supporters of Deposit Draft**

Ref No	Name	Agent	Response Ref
B/870/41	Sustainable Gwynedd Gynladwy		32

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2202	Welsh Assembly Government		32

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name	Agent	Response Ref
B/756/2104	Environment Watch Wales & the Borders		32

## Main Issues

- The scope of the policy.
- The integration of new development with the cycling network, paths and rights of way.
- The effect of cycling paths on nature conservation interests.
- The funding of path maintenance.

## Inspector's Considerations and Conclusions

### *The scope of the policy*

1. DD Policy CH20 provides that all parts of the cycling network, paths and public rights of way will be safeguarded and promoted by various stated actions. An objector argues that it should make specific provision for the creation of new cycling paths in locations where conditions for cyclists are dangerous on existing highways. The policy is intended to safeguard, among other things, existing cycle routes. The identification of deficiencies in the existing transport network and the formulation of proposals to deal with these is a matter for the Council's Transport, Policy and Programme process rather than the UDP.

### *The integration of new development with the cycling network, paths and rights of way*

2. An objector argues that, where a proposed development affects a right of way, the route should where possible be incorporated into that scheme. The LPA agrees and proposes to achieve this via NA 173. The proposed new wording incorporates sufficient flexibility to ensure that the continuity of the route is maintained, either through its incorporation within the development or by its diversion or replacement. The proposed text of NA 173 does, however, omit the word 'be' after the word 'cannot'. This necessary text is proposed to be inserted by NAP 108.

### *The effect of cycling paths on nature conservation interests*

3. An objector argues that the use of cycling paths can have a harmful effect on wildlife due to the disturbance that passing cyclists cause. The plan must be read as a whole, however. DD Policy B19 provides the necessary protection to species and their habitats that are of international, national and local importance.

### *The funding of path maintenance*

4. An objector argues that public paths which are rarely used should receive only limited funding for their maintenance. Decision making in respect of the allocation of the maintenance budget for public paths is not part of the Town and Country Planning process.

## RECOMMENDATIONS

**I recommend:**

**(REC.0484) that the DD be modified by the acceptance of NA 173 as subject to NAP 108;**

**(REC.0485) that no other modification be made to the DD in response to these objections.**

**POLICY CH21 – PROTECTING THE ROUTES OF FORMER RAILWAYS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA174, NA 386

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/985/4	Welsh Highland Railway Ltd	Graham Farr	31
B/870/40	Sustainable Gwynedd Gynladwy		31
B/964/1	Mike Hart – Ffestiniog Railway Company	Peter Marston	31
B/985/9	Welsh Highland Railway Ltd	Graham Farr	31
B/985/5	Welsh Highland Railway Ltd	Graham Farr	31
B/1225/7	Network Rail Infrastructure Ltd		31

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/153	Welsh Assembly Government		31

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name	Agent	Response Ref
B/985/2019	Welsh Highland Railway Ltd	Graham Farr	31
B/964/2008	Mike Hart – Ffestiniog Railway Ltd	Peter Marston	31
B/985/2018	Welsh Highland Railway Ltd	Graham Farr	31
B/756/2170	Environment Watch Wales and the Borders		31
B/985/2020	Welsh Highland Railway Ltd		31

## Note

- Objections B/985/4, B/985/5 and B/985/9 are conditionally withdrawn.
- The section of this report which relates to 'Protected Railway Route, Porthmadog' is also relevant to this policy. It contains my recommendation in relation to NA 386.

## Main Issues

- The accuracy of policy text.
- The priority to be given to the elements of the policy.
- The potential for the re-opening of railway lines.
- The integration of policy text with the proposals map.

## Inspector's Considerations and Conclusions

### *The accuracy of policy text*

1. The DD version of Policy CH21 provides that the routes of former railways will be safeguarded from development that would have various stated undesirable outcomes. In its final element it wrongly refers to the former North Wales Highland Railway instead of to the Welsh Highland Railway. The LPA proposes to correct this via NA 174.

### *The priority to be given to the elements of the policy*

2. An objector argues that the first priority in respect of former railway lines should be their re-use as railways. Other options such as walking/cycling or ecological uses should be considered only if re-opening as a railway is not practicable. The LPA agrees and, via NA 174, proposes to delete the DD text which would give priority to the use of certain former railways as cycle routes. The proposed changed text would simply safeguard the routes of former railways from development which would prevent their future use as cycling/walking tracks or their re-opening as light or heavy railways or which would have a harmful effect on their function as a wildlife corridor. This revised policy structure would allow priority to be given to any of these future uses if a reasoned case could be made for it. Giving priority to any one of these options at UDP-making stage, as the objector advocates, is undesirable because it could constrain an alternative which emerges as a viable and desirable option at a later stage.

### *The potential for the re-opening of railway lines*

3. DD paragraph 5.3.11 which supports Policy CH21 informs that the LPA will continue to examine the possibility of re-opening the railway from Bangor to Caernarfon and from Caernarfon to Llanberis. An objector argues that the LPA should, in addition, examine the scope for the re-opening of the former railway between Caernarfon and Pwllheli. The DD text is based on technical work done some years ago by the LPA. No similar examination has been made in respect of the former railway referred to by the objector. There is, therefore, no basis for a conclusion that re-opening of that route might be possible within the plan period. In order to avoid the possibility of blight, and mindful of paragraph 1.23 of Unitary Development Plans Wales, 2001 on the subject, no reference to such a scheme should be made within the supporting text for Policy CH21.

*The integration of policy text with the proposals map*

4. Objectors identify a number of inconsistencies between the text of Policy CH21 and the proposals map in respect of the alignment of railway lines. The LPA agrees and proposes NA 386 to rectify this error. A further objector notes that the policy suggests that every former railway route within the Gwynedd cycling strategy is shown on the proposals map when this is not the case. The LPA confirms that only some of these routes have been so identified. Because it has no control over all the railway track beds which have been identified in the Gwynedd Cycling Strategy, and because no approved proposals or specific planning permissions are in place for any of them, it is concerned that showing all the routes on the proposals map would mislead plan users by giving an unrealistic expectation that these schemes will be implemented. I agree with the LPA that, for these reasons, it is right that rather than show all of the potential routes on the proposals map, reference should not be made to them at all within Policy CH21. This would be achieved via NA 174.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0486) that the DD be modified by the acceptance of NA 174;**

**(REC.0487) that no other modification be made to the DD in response to these objections.**

## POLICY CH22 – THE RAILWAY NETWORK

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA175

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/964/3	Mike Hart – Ffestiniog Railway Company	Peter Marston	239

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/649/3	Don Mathew		239

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/964/2009	Mike Hart – Ffestiniog Railway Company	Peter Marston	239
B/985/2016	Welsh Highland Railway Ltd	Graham Farr	239

### Main Issue

- Whether the DD is appropriate, having regard to the promotion of an integrated travel network.

### Inspector's Considerations and Conclusions

1. DD Policy CH22 provides that proposals for improvements to passenger and business services and facilities at existing railway stations and along railways which contribute to an integrated travel network will be approved, provided stated criteria are satisfied. An objector argues that this does not support the development of railway stations as inter-modal transfer points. The term 'integrated travel network' is wide enough to encompass integration, not simply between various rail services but between these and other transport modes. Indeed, the final element of the supporting paragraph 5.3.12 confirms this to be the case.

2. In response to the objection the LPA proposes NA 175 in respect of this policy. For the reasons set out above, I consider that this is not necessary to meet the concerns of this objector.

**RECOMMENDATION**

**I recommend:**

**(REC.0488) that no modification be made to the DD in response to this objection and, in particular, that NA 175 be not accepted.**



**POLICY CH23 – NEW ROADS AND ROAD IMPROVEMENTS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/649/4</b>	<b>Don Mathew</b>		<b>33</b>
<b>B/767/8</b>	<b>Friends of the Earth (Mon &amp; Gwynedd)</b>		<b>33</b>

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/154</b>	<b>Welsh Assembly Government</b>		

**Main Issue**

- Whether the DD is appropriate having regard to the effect of highway schemes on the economy and the environment.

**Inspector’s Considerations and Conclusions**

1. DD Policy CH23 provides that proposals for the improvement of existing roads and for new sections of road, will be approved provided stated requirements and criteria are satisfied. An objector argues that such schemes should not have a negative effect on the local economy. The initial text of the policy identifies economic justification as an essential aspect of scheme assessment. Both objectors emphasise the importance of environmental considerations and, in particular, the need to avoid the increase of greenhouse gas emissions.

2. PPW (paragraph 8.1.2 and 8.1.5) advises that the Welsh Assembly Government’s Strategic Plan ‘Plan for Wales 2001’ commits it to developing an integrated, effective and accessible transport system that supports a growing economy. Local authorities should ensure that when planning new transport infrastructure, including roads, their approach is compatible with the New Approach to Appraisal. They should ensure that the full range of possible schemes, including solutions other than road enhancement, is considered.

3. It is clear, therefore, that environmental considerations do not impose a veto over highway schemes. Instead they are an important consideration to be weighed with others, including the support of economic factors, in the decision making process. Policy CH23 reflects this approach by giving emphasis to both the economic and environmental factors in its initial wording and also by stressing the

importance of considering other (i.e. non-road improvement/construction) options. For these reasons I conclude that policy CH23 gives appropriate weight to economic and environmental factors in the context of Government planning policy and guidance.

## **RECOMMENDATION**

**I recommend:**

**(REC.0489) that no modification be made to the DD in response to these objections.**

## POLICY CH24 – SAFEGUARDING PROPOSED ROAD ROUTES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA176

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/985/11	Welsh Highland Railway Ltd	Graham Farr	240
B/993/1	Mike Gilbert Welsh Assembly Government	Nigel Murphy Halcrow Group Ltd	240

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/15 5	Welsh Assembly Government		240

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/649/5	Don Mathew		240

### Notes

- Objection B/985/11 is unconditionally withdrawn.
- Objection B/993/1 is dealt with in the site-specific section of this report which relates to the Porthmadog/Tremadog/Minffordd Bypass in the Porthmadog DCA.

### Main Issue

- Whether the DD is appropriate, having regard to the description of the Penygroes Northern By-Pass

### Inspector's Considerations and Conclusions

1. DD paragraph 5.3.17 informs that, among other things, a further assessment will examine the possibility of providing a link road to the north of Penygroes from the quarries to the A470 road. An objector draws attention to the fact that the relevant highway is the A487(T). The LPA agrees and proposes to correct the paragraph as an aspect of NA 176. For the reasons I give in the section of this report which relates to the Northern Relief Road, Penygroes, within the Caernarfon DCA in the site-specific part of this report, I have concluded that land

should not be safeguarded for that scheme. It is not, therefore, appropriate for the DD to be modified via NA 176.

**RECOMMENDATION**

**I recommend:**

**(REC.0490) that no modification be made to the DD in response to these objections and, in particular, that NA 176 be not accepted.**

**POLICY CH25 – CAERNARFON AIRFIELD**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/649/6</b>	<b>Don Mathew</b>		
<b>B/970/3</b>	<b>General Aviation Awareness Council</b>	<b>Anna Bloomfield, Bloomfields Ltd</b>	

**POLICY CH26 –IMPACT OF DEVELOPMENT ON TRIPS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/8	Network Rail Infrastructure Ltd		271

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/649/7	Don Mathew		271
B/870/42	Sustainable Gwynedd Gynaladwy		271
B/870/49	Sustainable Gwynedd Gynaladwy		271

**Main Issue**

- Whether the DD is appropriate having regard to the comprehension of supporting text.

**Inspector’s Considerations and Conclusions**

1. DD paragraph 5.4.3 which supports Policy CH26, presents a hierarchy of transport users. The objector argues that since ‘visitors in buses’ are included, so should ‘railway visitors’. The LPA confirms that the term ‘public transport users’ within the hierarchy refers to the passengers of both buses and railway trains. There is, therefore, no need for the additional category sought by the objector. The LPA informs that the term ‘visitors in buses’ within the DD text refers to ‘visitors in private coaches’ to distinguish them from visitors on public transport. In the interests of comprehension this should be made clear.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0491) that the DD be modified by the replacement of the term ‘visitors in buses’ by the term ‘visitors in private coaches’ within paragraph 5.4.3;**

**(REC.0492) that no other modification be made to the DD in response to this objection.**

**POLICY CH27 – SAFEGUARDING AND IMPROVING LINKS FOR PEDESTRIANS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA177

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/15 6	Welsh Assembly Government		272

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/964/4	Mike Hart – Ffestiniog railway Company	Peter Marston	272
B/870/43	Sustainable Gwynedd Gynladwy		272
B/649/8	Don Mathew		272

**Main Issue**

- Whether the DD is appropriate, having regard to the relevant stage of the planning permission process.

**Inspector's Considerations and Conclusions**

1. The final element of DD Policy CH27 provides that, when a development is permitted, planning conditions or agreements will be used to ensure that any footpath which is consistent with the details submitted with the planning application is provided. The objector notes that the details that are approved may differ from those which are the subject of the initial planning application. The LPA agrees and proposes, via NA 177, to change the policy wording to refer to footpaths noted in the approved details. I conclude that this will add necessary clarity to the plan text.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0493) that the DD be modified by the acceptance of NA 177;**

**(REC.0494) that no other modification be made in response to this objection.**

**POLICY CH28 – ACCESS FOR ALL**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/649/9</b>	<b>Don Mathew</b>		
<b>B/870/44</b>	<b>Sustainable Gwynedd Gynladwy</b>		
<b>B/964/5</b>	<b>Mike Hart – Ffestiniog railway Company</b>	<b>Peter Marston</b>	



## POLICY CH29 – PROVIDING FOR CYCLISTS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA178

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/649/10	Don Mathew		35

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/964/6	Mike Hart – Ffestiniog railway Company	Peter Marston	35
B/870/45	Sustainable Gwynedd Gynladwy		35

### Main Issue

- Whether the DD is appropriate, having regard to the promotion of highway safety.

### Inspector's Considerations and Conclusions

1. DD Policy CH29 provides that development proposals will be refused unless, among other things, they secure clear and safe access into the site for cyclists together with such links to the existing or proposed cycle network. The objector argues that measures, including 20mph zones, should be introduced to improve road safety for all, especially the young and elderly. The plan must be read as a whole. Policy CH31 requires that development proposals will be approved only if they, among other things, secure that appropriate traffic calming measures are provided in connection with any scheme which is likely to lead to a substantial increase in traffic. In relation to Policy CH29 itself, NA 178 would secure that cycle routes across the particular site were not only attractive and direct but also safe. The improvement of the existing provision for cyclists is not a matter that can be tackled through the UDP.

### RECOMMENDATIONS

I recommend:

**(REC.0495) that the DD be modified by the acceptance of NA 178;**

**(REC.0496) that no other modification be made to the DD in response to this objection.**

**POLICY CH30 – INCREASING ACCESSIBILITY BY PUBLIC TRANSPORT**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/46</b>	<b>Sustainable Gwynedd Gynladwy</b>		
<b>B/964/7</b>	<b>Mike Hart – Ffestiniog railway Company</b>	<b>Peter Marston</b>	
<b>B/752/1</b>	<b>Strategic Rail Authority</b>		
<b>B/1225/9</b>	<b>Network Rail Infrastructure Ltd</b>		

**POLICY CH31 – SAFETY ON ROADS AND STREETS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/649/11</b>	<b>Don Mathew</b>		
<b>B/870/47</b>	<b>Sustainable Gwynedd Gynladwy</b>		

## **POLICY CH32 – RURAL LANES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### **Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/52</b>	<b>Environment Watch Wales and the Borders</b>		
<b>B/870/48</b>	<b>Sustainable Gwynedd Gynladwy</b>		
<b>B/649/12</b>	<b>Don Mathew</b>		

## POLICY CH33 – PUBLIC PARKING FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 179

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/734/157	Welsh Assembly Government		274

### Main Issue

- Whether the DD is appropriate having regard to the intended role of public car parking facilities.

### Inspector's Considerations and Conclusions

1. DD Policy CH33 provides that public car parking facilities will be approved provided that stated criteria are satisfied. The related paragraph 5.4.16 explains that the provision of public car parks at strategic points can encourage the use of other transport modes such as public transport and car sharing for onward journeys. The objector emphasises their potential role in securing that the final part of a journey is made on foot. The LPA agrees and, via NA 179, amplifies the text to make specific reference to this.

### RECOMMENDATIONS

I recommend:

**(REC.0497) that the DD be modified by the acceptance of NA 179;**

**(REC.0498) that no other modification be made to the DD in response to this objection.**

## POLICY CH34 – PRIVATE CAR PARKING FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA180

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/158	Welsh Assembly Government		275

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/923/10	Tesco Stores Ltd	Paul Lester (DPP)	275

### Main Issue

- Whether the DD is appropriate, having regard to the influence of car parking on the choice of transport mode and the pattern of development.

### Inspector's Considerations and Conclusions

1. DD Policy CH34 provides that proposals for new development, extensions to existing development or change of use will be refused unless off-street parking is provided in accordance with the Council's car parking standards. Various specified factors are to be taken into consideration. The objector emphasises that LPAs should adopt an integrated approach to traffic management. Car parking is a major influence on the choice of transport mode and on the pattern of development. Car parking standards should be applied as maximum levels.

2. The LPA agrees and, via NA 180, proposes to change the text of supporting paragraph 5.4.17 to explicitly refer to the role of car parking in the reduction of car journeys. The proposed change will introduce new policy wording to confirm that the LPA's car parking standards are maximum figures. It will also confirm that, where there is a need for off-street parking and the developer does not offer this on his site, and it is not possible to take advantage of existing provision, the development proposal will be approved provided that a contribution is made to the cost of improving accessibility to the site via sustainable transport modes, or to the cost of off-street provision elsewhere in the locality. I conclude that, subject to this proposed change, Policy CH34 provides the scope for private car parking to be used by the LPA as an important component of an integrated approach to securing a sustainable pattern of development.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0499) that the DD be modified by the acceptance of NA 180.**

**(REC.0500) that no other modification be made to the DD in response to this objection.**

## POLICY CH35 – EDUCATION, HEALTH AND COMMUNITY SERVICES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA181

This Section is subject to Further Proposed Changes Nos: NAP53

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/49/3	Maldwyn Lewis		276
B/990/1	National Offender Management Service	Paul Dickinson & Associates	276

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1030/6	University of Wales, Bangor	Sian Kilner, Kilner Planning	276

### Main Issues

- The level of developer contribution to the provision of school facilities.
- The appropriate policy framework to enable the development of a prison.
- The prospect that a Community Hospital will be built near Tremadog.

### Inspector's Considerations and Conclusions

#### *The level of developer contribution to the provision of school facilities*

1. DD Policy CH35 provides that development proposals for new facilities for educational, health and community purposes, or extensions to existing facilities, will be permitted provided stated criteria are satisfied. Where new residential development is permitted, and the educational needs of the children living in the new dwellings cannot be met at an existing school, planning conditions or agreements will be used to ensure that the developer provides or contributes to the necessary facilities to meet those needs. An objector emphasises that the level of any such contribution should be related to the overall economic viability of site development and should not be at a level which prevents site development. The LPA agrees, and, via NA 181, confirms that the level of contribution will be the subject of negotiation between it and the developer. The LPA also proposes NAP 53 which would widen the range of relevant facilities from schools to other community services. This has not been the subject of public consultation and a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.



*The appropriate policy framework to enable the development of a prison*

2. An objector with responsibility for the administration of the prison service in England and Wales has identified Gwynedd as being within a priority area of search for the provision of additional prison places to accommodate a significant increase in demand for these. The objector seeks an allocation of land for the construction of such a facility or the policy context within which a proposal could be determined.

3. Despite being contacted by the LPA the objector has not provided evidence of need for a prison in Gwynedd, indicated what site characteristics are appropriate or proposed a specific site. There is, therefore, no basis on which a site-specific allocation of land can be made at this stage. If a planning application is submitted, Policy CH35 and other generic policies provide the framework within which it can be determined.

*The prospect that a Community Hospital will be built near Tremadog*

4. DD Policy CH35, among other things, provides that a site shown on the proposals map at Tremadog will be safeguarded for the construction of a new Community Hospital. An objector argues that this should not be done because a different site is more suitable for this. Planning permission has, however, been granted for the construction of this hospital at the Tremadog site. This objection has, therefore, been overtaken by events.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0501) that the DD be modified by the acceptance of NA 181;**

**(REC.0502) that no other modification be made to the DD in response to these objections.**

## POLICY CH36 – SAFEGUARDING EXISTING FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA182

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/990/3	National Offender Management Service	Paul Dickinson & Associates	278

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/159	Welsh Assembly Government		278

### Note

- Objection B/990/3 is dealt with in the section of this report which relates to Policy CH35.

### Main Issue

- Whether the DD is appropriate, having regard to the mutual consistency of policies.

### Inspector's Considerations and Conclusions

1. DD Policy CH36 provides that proposals to change the use of buildings used as educational, health and community facilities to other purposes will be refused unless specified criteria are satisfied. An objector argues that these should be consistent with the provisions of Strategic Policy 13. The LPA agrees and, via NA 182, proposes to add an additional criterion to secure that the new use will not have an unacceptable impact on the environment or the amenities of local residents. I conclude that this will secure the internal consistency of the plan.

### RECOMMENDATIONS

I recommend:

**(REC.0503) that the DD be modified by the acceptance of NA 182;**

**(REC.0504) that no other modification be made to the DD in response to these objections.**

## POLICY CH37 – FURTHER AND HIGHER EDUCATION DEVELOPMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA183

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1030/8	University of Wales Bangor		280

### Main Issue

- Whether the DD is appropriate, having regard to the characteristics of the campus of the University of Wales, Bangor.

### Inspector's Considerations and Conclusions

1. DD Policy CH37 provides that proposals for new buildings or extensions to existing buildings on the campus of a further or higher education establishment will be permitted if stated criteria are satisfied. The objector notes that the categories of buildings referred to do not include student residential accommodation and that the wording assumes that such educational institutions are on a single site, whereas that of the University of Wales, Bangor, is on several sites. The LPA agrees that the policy wording should reflect these aspects and proposes NA 183 to secure this. I conclude that this will provide a statement of policy coverage which is relevant to the operational characteristics of further and higher education establishments.

### RECOMMENDATIONS

I recommend:

**(REC.0505) that the DD be modified by the acceptance of NA 183;**

**(REC.0506) that no other modification be made to the DD in response to this objection.**

## POLICY CH38 - CEMETERIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA184; NA185; NA267

This Section is subject to Further Proposed Changes Nos: NAP109

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/708/1	Steffan Jones		284
B/708/3	Steffan Jones		284

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/18	Environment Agency Wales		284

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2127	Environment Watch Wales & the Borders		284

### Main Issues

- The impact of development on surface water and ground water.
- The degree of certainty with which the proposal for the Cae Phillips site is expressed.

### Inspector's Considerations and Conclusions

#### *The impact of development on surface water and ground water*

1. DD Policy CH38 provides that proposals for new cemeteries and extensions to existing ones will be permitted provided that specified criteria are satisfied. An objector argues that these should include the requirement that development will not have an adverse impact on surface water or ground water. The LPA agrees and, via NA184, proposes to insert this requirement as an element of criterion 4. I conclude that, having regard to the nature of the proposed development, this is an essential requirement. The LPA proposes NAP 109 to secure that this text is presented as a separate criterion in its own right.

*The degree of certainty with which the proposal for the Cae Phillips site is expressed*

2. The final element of Policy CH38 informs that Cae Phillips, in Caernarfon, is safeguarded for the provision of an extension to the Llanbeblig cemetery. An objector argues that, although this possibility has been explored, the policy expresses it with too great a degree of certainty. The LPA agrees and, via NA 184 and NA 185, proposes to re-word this element of the policy and the supporting text to confirm that the land has been identified as a possible suitable site for the long term development of a burial ground when Llanbeblig public cemetery is full. The same objector argues that the proposals map must be amended to show the correct boundary of the Cae Phillips protected playing area. The LPA agrees and proposes NA 267 to secure this.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0507) that the DD be modified by the acceptance of NA 184 as subject to NAP 109;**

**(REC.0508) that the DD be modified by the acceptance of NA 185;**

**(REC.0509) that the DD be modified by the acceptance of NA 267;**

**(REC.0510) that no other modification be made to the DD in response to these objections.**

## INTRODUCTION – SPORTS AND LEISURE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA186

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/866/31	Snowdonia National Park Authority		81

### Unconditionally Withdrawn Objection to Deposit Draft

Objection ref. No	Name of objector	Agent	Response Ref.
B/734/16 1	Welsh Assembly Government		

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the LPA area.

### Inspector's Considerations and Conclusions

1. DD paragraph 5.6.1 informs that municipal leisure facilities are available in specified urban areas including Dolgellau. The objector argues that, because this town lies outside the LPA area, it is not appropriate to refer to it in the plan text. The LPA agrees and proposes to delete reference to it via NA 186. This will satisfy the concerns of the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0511) that the DD be modified by the acceptance of NA 186;**

**(REC.0512) that no other modification be made to the DD in response to these objections.**

**POLICY CH40 – SAFEGUARDING PLAYING FIELDS AND PLAY AREAS, AND OPEN SPACES OF RECREATIONAL VALUE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA187

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1231/1	Kevin Williams – Gweithgor Partneriaeth Plant Gwynedd		614

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/162	Welsh Assembly Government		204
B/734/163	Welsh Assembly Government		204

**Note**

- Objection B/1231/1 is responded to in LPA proof 347 not 614.

**Main Issues**

- The terminology used.
- The basis for the assessment of the adequacy of provision.
- The merits of identifying a play area at Dinas Dinlle.

**Inspector's Considerations and Conclusions**

*The terminology used*

1. DD Policy CH40 seeks to safeguard playing fields, play areas and open spaces of recreational value. An objector argues that it is necessary to clarify the terms used and how they relate to each other. The LPA agrees, and, via NA 187, proposes to change the policy so that it refers only to 'open spaces of recreational value' which it then defines in the supporting paragraph 5.6.4 as 'play areas with equipment, play areas, informal open spaces, urban parks and allotments'. I conclude that this clarifies the scope of the policy and the way that the various terms relate to each other.

*The basis for the assessment of the adequacy of provision*

2. DD Policy CH40 provides, among other things, that proposals that would lead to the loss of existing open spaces of recreational value will be refused unless the facility is no longer needed or the remaining provision is sufficient to meet need. An objector queries how the LPA will know that this is the case in any particular location. The LPA confirms that it maintains a record of the facilities that are under local authority control. It also conducts surveys of community facilities throughout its area. Together these will present a comprehensive assessment of supply down to a small spatial scale. This can then be assessed against the standards of the National Playing Fields Association which are referred to in DD paragraph 5.6.7. I conclude that these sources are sufficient to enable the LPA to effectively apply Policy CH40.

*The merits of identifying a play area at Dinas Dinlle*

3. An objector notes that a play area at Dinas Dinlle is not shown on the proposals map. The LPA confirms that this is because it is outside the Development Boundary for the settlement. DD paragraph 5.6.4 confirms that such areas are protected by Policy CH40. There is, therefore, no need for it to be shown on the proposals map.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0513) that the DD be modified by the acceptance of NA 187;**

**(REC.0514) that no other modification be made to the DD in response to these objections.**



**POLICY CH41 – PROVISION OF OPEN SPACE AND OUTDOOR PLAY AREAS IN NEW HOUSING DEVELOPMENT**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA188

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/28	House Builders Federation		592
B/867/3	House Builders Federation		592
B/773/31	Chris Wynne (North Wales Wildlife Trust)		592
B/756/53	Environment Watch Wales & the Borders		70

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/166	Welsh Assembly Government		592

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/867/2034	House Builders Federation		592

**Main Issues**

- The degree of certainty with which the policy is expressed.
- The scale of related development.
- The circumstances in which the policy will be applied.
- The nature of the facility to be provided.

**Inspector's Considerations and Conclusions**

*The degree of certainty with which the policy is expressed*

1. DD Policy CH41 provides that new housing development of 10 or more dwellings will normally be required to provide suitable open space and outdoor playing spaces in line with the National Playing Fields Association (NPFA) standard

as an integral part of the scheme. Provision is also made for the circumstances where this cannot be secured on the development site.

2. An objector argues that the use of the word 'normally' introduces a measure of uncertainty because it is not possible to know in advance whether the policy will be applied in a particular case. The LPA agrees and, via NA 188, proposes to change the policy text to remove this proviso and to clarify that the policy will apply in areas where existing open space cannot meet the needs of the proposed housing development. I conclude that this will secure the basis for the consistent decision making that is required by 'Unitary Development Plans – Wales'. It would also satisfy the concerns of another objector that provision should be required only in areas where deficiencies exist. The reference in the final part of the policy to the use of planning conditions and/or obligations to secure this will ensure, via the application of the advice of Welsh Office Circular 35/95, that what is required will be fairly and reasonably related to the development to be permitted.

3. An objector argues that, rather than requiring the provision of additional open space and outdoor play areas, the policy should seek negotiation with developers on this matter. NA 188 proposes to replace the word 'required' with 'expected'. Furthermore the supporting paragraph 5.6.6 which is proposed to remain in place clarifies that the terms of the policy will be relaxed if an adequate supply of such resources can be 'demonstrated'. This confirms that negotiation is central to the application of the policy.

4. An objector proposes a specific level of developer contribution to the provision of open space and outdoor play areas where these are not to be provided on-site. The reference to negotiation between the LPA and the developer will, however, secure that what is required is fairly and reasonably related to the development to be permitted as Welsh Office Circular 35/95 requires. The specification of a scale of contribution at plan-making stage would not secure the necessary degree of flexibility.

#### *The scale of related development*

5. An objector argues that a development of 10 dwellings cannot be considered to be substantial and, therefore, that a higher threshold should be set for the application of the policy. I agree with the LPA, however, that in the context of the pattern of development in Gwynedd and, in particular the small size of many settlements, a development of that scale can be a very substantial one.

#### *The circumstances in which the policy will be applied*

6. An objector interprets NA 188 as removing the reference to the NPFA standards and argues that this should be retained to provide the basis for any assessment of the need for additional provision in a particular case. The LPA confirms, and a plain reading of this Proposed Pre-inquiry Change confirms, that NA 188 does not propose to remove this wording.

#### *The nature of the facility to be provided*

7. An objector argues that the policy should also seek what he refers to as 'biodiversity gain'. The plan is to be read as a whole. Other policies would protect existing biodiversity resources. Welsh Office Circular 35/95 (paragraph 25)

confirms that it is not sufficient for a condition to be related to a planning objective. It must also be justified by the nature of the development or its effect on its surroundings. The need for action to protect or promote biodiversity would not necessarily arise from every proposed housing development.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0515) that the DD be modified by the acceptance of NA 188;**

**(REC.0516) that no other modification be made to the DD in response to these objections.**

**POLICY CH43 – MAJOR COMMERCIAL LEISURE DEVELOPMENTS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Unconditionally Withdrawn Objection to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref.</b>
<b>B/734/167</b>	<b>Welsh Assembly Government</b>		

## **POLICY CH44 – SPORTS AND RECREATIONAL FACILITIES IN THE COUNTRYSIDE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/575/19</b>	<b>Aberdaron Community Council</b>		<b>593</b>

### **Main Issue**

- Whether the DD is appropriate, having regard to the effect of riding/pony trekking centres on the safe and free flow of traffic.

### **Inspector's Considerations and Conclusions**

1. DD Policy CH44 provides that proposals for sport and recreational facilities in the countryside, which genuinely require a rural location, will be approved provided that stated criteria can be satisfied. The objector expresses concern that riding/pony trekking centres should be located only in places where the riding of horses and ponies does not cause hazard on rural roads. This aspect is addressed by criterion 4 which requires that such centres must have safe access to suitable bridleways.

### **RECOMMENDATION**

**I recommend:**

**(REC.0517) that no modification be made to the DD in response to this objection.**

## POLICY CH45 – MARITIME ACTIVITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA189

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/168	Welsh Assembly Government		71
B/734/169	Welsh Assembly Government		71
B/1034/15	National Trust Wales	Chris Lambart	71

### Main Issues

- The requirement to demonstrate the need for the development.
- The effect on nature conservation interests.
- The use of appropriate terms.

### Inspector's Considerations and Conclusions

#### *The requirement to demonstrate the need for the development*

1. DD Policy CH45 provides that proposals for development that will improve and extend the variety of maritime facilities within existing marinas or improve the quality of boating provision or upgrade existing facilities within existing harbours will be approved provided that stated criteria are satisfied. The first criterion is that there is a demonstrable need for the development. An objector argues that this is an unnecessary step. The LPA agrees and proposes to remove this criterion via NA 189. I conclude that this will bring the plan text into conformity with the framework of the Government's planning policy and guidance.

#### *The effect on nature conservation interests*

2. An objector argues that the policy should require any proposals considered under the terms of this policy to address any impact of the development on nature conservation interests. The LPA agrees and, via NA 189, proposes to add criterion 3 to secure this. The plan is to be read as a whole, however. Policies B14, B15 and B16 provide protection for sites of international, national, regional and local significance for nature conservation. It is not, therefore, necessary to duplicate this protection within Policy CH45.

*The use of appropriate terms*

3. An objector argues that in element 'b' of the Welsh version of the policy the word 'porthladdoedd' is preferable to 'harbwrs'. The LPA agrees and proposes to secure this via NA 189.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0518) that the DD be modified by the acceptance of NA 189 only to the extent that it relates to the deletion of DD criterion 1, and to the use of the word 'porthladdoedd' instead of 'harbwrs' in the Welsh version of the policy;**

**(REC.0519) that no other modification be made to the DD in response to these objections.**

## POLICY CH46 – BOAT STORAGE FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA190

### Conditionally Withdrawn Objections to Deposit Draft

Objection No	Ref	Name of Objector	Agent	Response Ref
B/734/170		Welsh Assembly Government		72

### Main Issue

- Whether the DD is appropriate, having regard to the need to secure the clear expression of the relevant criteria.

### Inspector's Considerations and Conclusions

1. DD Policy CH46 provides that proposals for boat storage facilities on unobtrusive sites will be approved. It then continues by providing that proposals for boat storage facilities that are associated with static or touring caravan sites, that are on a scale beyond the requirement of the site in question, will be refused. An objector argues that the key issue is whether the proposed site is unobtrusive. If a boat storage area at a caravan site has that quality it might be appropriate to store boats there, even if the number was more than was generated by the needs of the site, because that would reduce demand on unsuitable areas elsewhere. The LPA agrees and, via NA 190, proposes to restructure the policy so that it simply secures that boats are stored in unobtrusive locations. I conclude that this wording expresses the objectives of both the LPA and the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0520) that the DD be modified by the acceptance of NA 190;**

**(REC.0521) that no other modification be made to the DD in response to this objection.**



## MONITORING – CHAPTER 6

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/783/6	Welsh Language Board		536

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/171	Welsh Assembly Government		536

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/50	Sustainable Gwynedd Gynladwy		

### Note

- This objection relates to the monitoring of Chapter 5, not Chapter 6.

### Main Issue

- Whether the DD is appropriate, having regard to the need to avoid duplication within the plan.

### Inspector's Considerations and Conclusions

1. The objector argues that, because Policy A2 has implications for the individual housing policies which are within Chapter 5, the provisions made for monitoring of the policies of that chapter should include reference to that policy. Provision for monitoring Policy A2 is, however, made in section 2.3 of the DD. In the interests of securing a concise expression of UDP policies no additional reference to the monitoring of Policy A2 should be made.

**RECOMMENDATION**

**I recommend:**

**(REC.0522) that no modification be made to the DD in response to this objection.**

## GENERAL – CHAPTER CH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/731/9	Iwan Rhys Edgar		535
B/839/1	Sally Miles	RPS Planning	535
B/768/10	Gareth Dobson		535

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/53	CPRW		

### Notes

- Objection B/731/9 is dealt with in the section of this report which relates to Policy CH1.
- Objection B/839/1 is dealt with in the sections of this report which relate to Policy CH1, 'Affordable Housing for Local Need Text' and the sections which relate to the alignment of Development Boundaries for individual settlements.
- Objection B/768/10 is dealt with in the section of this report dealing with Policy B21.

## POLICY CH – OMISSION POLICIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA192: NA191

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/132	Welsh Assembly Government		508
B/756/50	Environment Watch Wales & the Borders		153

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/117	Welsh Assembly Government		336

### Notes

- Objection B/734/132 is dealt with in the section of this report which relates to Affordable Housing for Local Need Text.
- Objection B/756/50 is dealt with in the section of this report which relates to Policy CH1.

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's Planning Policy advice.

### Inspector's Considerations and Conclusions

1. PPW (paragraph 9.2.3) advises that LPAs must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. An objector notes that the DD does not contain a policy to maintain that level of provision. The LPA agrees that this is necessary and proposes to introduce this via NA 191. I consider that this proposed change is necessary in order to bring the UDP into conformity with the framework of the Government's planning policy and advice.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0523) that the DD be modified by the acceptance of NA 191;**

**(REC.0524) that no other modification be made to the DD in response to these objections.**

**OBJECTIONS TO CHAPTER 'D'**

## INTRODUCTION – CHAPTER 6

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA194; NA195; NA196; NA198; NA199

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/54	Sustainable Gwynedd Gynladwy		607
B/756/54	Environment Watch Wales & the Borders		69
B/756/55	Environment Watch Wales & the Borders		69
B/768/9	Gareth Dobson		606
B/783/16	Welsh Language Board		606
B/783/11	Welsh Language Board		606

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/51	Sustainable Gwynedd Gynladwy		73
B/870/52	Sustainable Gwynedd Gynladwy		607

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/954/6	Bourne Leisure Ltd	Margaret Baddeley, Nathaniel Lichfield & Partners	
B/870/53	Sustainable Gwynedd Gynladwy		
B/783/17	Welsh language Board		

## Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2105	Environment Watch Wales & the Borders		

### Note

- Pre-inquiry Proposed Change NA 197 is dealt with in this section.

### Main Issues

- The relevance of economic growth.
- The scope of the plan.
- The role of the plan in relation to the promotion of renewable resources and information technology.
- The relationship between the Welsh language and economic regeneration.
- The shades of meaning attached to particular words.
- The status of the introductory text in relation to tourism.

### Inspector's Considerations and Conclusions

#### *The relevance of economic growth*

1. The DD (paragraph 6.1.1) informs that the UDP aims to assist in the raising of living standards and the creation of employment opportunities in Gwynedd. Paragraph 6.1.17 confirms that a key objective of the plan is the promotion of sustainable economic growth and a growth in employment across the plan area. Objectors argue that the UDP should not explicitly seek to promote economic growth, wealth creation and the raising of living standards. The LPA agrees and, via NA 196, proposes to delete the reference to 'economic growth' and replace it with 'development'. Via NA 194 it proposes to delete the reference to raising the standard of living and replace it with a reference to enhancing the quality of life of local residents.

2. PPW (paragraphs 7.1.2 to 7.1.6) confirms that WAG is committed to, among other things, securing economic progress for Wales. The number and quality of jobs must be increased. Economic inactivity must be reduced. Economic performance must be boosted in order that Welsh gross domestic product per capita may be raised. Wealth creation and environmental quality are seen as increasingly inter-connected. Businesses should be helped to maximise their competitiveness. All communities need new employment opportunities. LPAs should formulate and implement land use planning policies for, among other things, wealth creating development.

3. It is clear, therefore, that the DD text of paragraphs 6.1.1 and 6.1.17, in referring to the raising of living standards, the promotion of sustainable economic growth and a growth in employment, reflect the objectives of WAG far more closely than would the wording proposed by NA 194 and NA 196. For this reason the DD text should be retained within the plan.



*The scope of the plan*

4. An objector argues that the UDP should secure the redistribution of wealth between the individuals who make up the population of Gwynedd. Such action is beyond the scope of the Town and Country Planning process.

*The role of the plan in relation to the promotion of renewable resources and information technology*

5. An objector argues that sustainable economic development could be promoted by a combination of information technology and the use of renewable sources of energy. The plan must be read as a whole. Policies C26 and C27 provide the framework for decision making on proposals for the development of renewable energy resources. Policy D11 provides the context for decision making in respect of home-based businesses. These will allow advantage to be taken of information technology without the need to travel between home and work locations.

*The relationship between the Welsh language and economic regeneration*

6. An objector notes the role of economic development in the plan area in reducing out migration of young people to seek employment elsewhere. He recognises that this will help maintain the status of the Welsh language in Gwynedd, but argues that this linkage should be made more apparent in the plan text. The plan is to be read as a whole. The relationships, both positive and negative, between development and the maintenance of Welsh language and culture are expressed in policy A2 and its supporting text.

*The shades of meaning attached to particular words*

7. DD paragraph 6.2.1 informs that planning has a role to play in sustaining and developing the economy. It confirms that the UDP designates specific sites for job-creating enterprises and provides a policy framework that caters for all types of enterprises that would create employment and contribute towards the local economy.

8. An objector argues that the word 'sustaining' is an inappropriate one in this context because of possible confusion with the concept of sustainable development. This word can, however, have the meaning of 'supporting'. Many words have multiple meanings and the correct one must be interpreted from their context. It is clear that in paragraph 6.2.1 the word 'sustaining' means 'supporting' the economy. There is, therefore, no need to replace it with an alternative word as is proposed by NA 197.

9. The same objector argues that it is wrong for the LPA to cater for all types of enterprises. The text does not, as the objector seems to think, imply that proposed development for all types of enterprise would be approved. It simply, as it must, expresses the need for the plan to have in place a policy framework to support decision making in relation to the full range of planning applications that may be submitted.

*The status of the introductory text in relation to tourism*

10. An objector criticises the text of DD paragraph 6.1.8 on the basis that it is not a well expressed tourism strategy. It is clear, however, that it is not intended to fulfil that role. It is simply a section of introductory text to the UDP policies on tourism. The Council's strategic approach to tourism (which relates to much more than land-use matters) is presented in the draft 'Gwynedd Tourism Strategy'. This will be subject to public consultation in due course.

11. An objector expresses concern with the definition of sustainable tourism that is presented in DD paragraph 6.1.9. The LPA confirms that this is taken from the Wales Tourist Board document 'Achieving Our Potential: A Tourism Strategy for Wales' which, itself, quotes the definition used by the World Tourism Organisation. However, the English version of the UDP, because of a mistranslation, refers to the 'World Tourism Institute' when it should have said 'World Tourism Organisation'. It proposes NA 195 to correct this. I agree that this is necessary in the interests of consistency between the Welsh and English versions of the plan text.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0525) that NA194 be not accepted;**

**(REC.0526) that the DD be modified by the acceptance of NA195;**

**(REC.0527) that NA196 be not accepted;**

**(REC.0528) that NA197 be not accepted;**

**(REC.0529) that no other modification be made to the DD in response to these objections.**

**POLICY D1 – HIGH QUALITY EMPLOYMENT SITES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA200

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/15	Welsh Development Agency		586
B/911/14	Welsh Development Agency		586
B/790/24	Gwynedd Archaeological Trust		586
B/952/4	RCH Douglas Pennant	Guy D Evans, Carter Jonas	586

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/16	CPRW		586

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/911//2020	Welsh Development Agency		586
B/911/2021	Welsh Development Agency		586

**Notes**

- This policy is subject to NAP 114.
- The part of objection B/790/24 which relates to the proposed extension to Parc Menai is dealt with in the sections of this report which relate to Policy D3 and the site-specific section which relates to Parc Menai, Bangor.
- Objection B/952/4 is dealt with in the section of this report which relates to Policy D3.

**Main Issues**

- The provision to be made for ancillary uses.
- The planning status of Parc Busnes, Porthmadog.

- The protection of the archaeological resource.

## **Inspector's Considerations and Conclusions**

### *The provision to be made for ancillary uses*

1. The DD, in policy D1, provides that land and units on 'High Quality Employment Sites' will be safeguarded solely for employment/business enterprises falling within Class B1 uses. An objector argues that it is necessary for the policy to provide for the development of ancillary uses on such sites. The LPA agrees that these could be valuable assets which could help to attract and retain employees and, thereby, support the viability of the employment area as a whole. I agree with the LPA, however, that these should be explicitly restricted in scope so that they cater for the needs of employees of enterprises within the 'High Quality Employment Site' rather than for customers generally, in order to avoid the generation of additional traffic movements which could lead to congestion within the employment areas and to patterns of business which could erode the established town centres. The LPA proposes to secure this via NA 200. The LPA subsequently proposes, via NAP 114, to refine the wording of the proposed policy and its supporting text. This would improve its grammatical construction and, thereby, aid comprehension. It has not, however, been the subject of public consultation and a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.

### *The planning status of Parc Busnes, Porthmadog*

2. At DD stage the table within the supporting text to policy D1 refers, among other things, to Parc Busnes, Porthmadog, as a High Quality Employment Site. The text of the policy itself confirms that these are to be safeguarded solely for enterprises falling within Use Class B1. An objector argues that, since this site has been granted planning permission for B1, B2 and B8 uses, it is not appropriate to refer to it as falling within the scope of that policy. The LPA agrees and, via NA 200, proposes to delete reference to this site from the table. It does not, however, at Pre-inquiry Change stage propose to refer to this site elsewhere in the plan. The LPA confirms that this is an oversight and proposes, via NAP 115, to insert a reference to this site within the table which relates to Policy D2. I agree that this is necessary in the interests of accuracy. However, since this Further Proposed Change has not been the subject of public consultation a full debate on its merits has not been possible. If the LPA wishes to pursue this, it should do so via the modification procedure.

### *The protection of the archaeological resource*

3. An objector notes that within the table which lists the defined High Quality Employment Sites, within the supporting text to policy D1, is the site at Glyn Rhonwy, Llanberis. He argues that this land has archaeological interest which should be addressed. The LPA confirms, at Pre-inquiry Change stage via NA 200, that it seeks to safeguard only a part of the Glyn Rhonwy area as a High Quality Employment Site and the remainder as a 'Redevelopment Site'. Then, via Further Proposed Change NAP 114 it proposes to remove the area in its entirety from the category of 'High Quality Employment Site' so that it may be designated as a whole as a 'Redevelopment Site'. As an aspect of its status as a

'Redevelopment Site' a 'Development Brief' would be prepared for this area. The LPA confirms that this will include reference to the archaeological resource.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0530) that the DD be modified by the acceptance of NA 200;**

**(REC.0531) that no other modification be made to the DD in response to these objections.**

## POLICY D2 – INDUSTRIAL SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA201

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/5	RCH Douglas Pennant	Guy D Evans, Carter Jonas	587
B/875/1	RPS Planning		587
B/756/56	Environment Watch Wales & the Borders		55
B/773/32	Chris Wynne (North Wales Wildlife Trust)		587
B/866/33	Snowdonia National Park Authority		587
B/911/13	Welsh Development Agency		587

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/2019	Welsh Development Agency		587
B/880/2004	Dr Sheila Roberts – Welsh Historic Gardens Trust		587

### Notes

- This part of the DD is subject to NAP 115.
- Objections B/756/56 and B/952/5 are dealt with in the section of this report which relates to Policy D3.

### Main Issues

- The need to retain a land resource for B1, B2 and B8 uses.
- The provision to be made for ancillary uses.
- The effect on registered parks and gardens.
- The reference to towns outside the plan area.

## Inspector's Considerations and Conclusions

### *The need to retain a land resource for B1, B2 and B8 uses*

1. DD Policy D2 provides that land and units on industrial sites will be safeguarded for industrial/business or other enterprises falling within Classes B1, B2 or B8. Any development or change of use of existing units falling outside these Use Classes on a designated industrial site will not be approved. An objector argues that the policy is too restrictive and should allow for development within classes other than B1, B2 and B8.

2. PPW (paragraph 7.2.7) advises, however, that because there is merit in maintaining an industrial land bank, and because certain industrial uses have characteristics which preclude their location in mixed-use areas, the sites designated for industrial development should not be used for other purposes such as retail, leisure or housing development that could be located elsewhere.

3. The LPA has proposed, via NA 201, that proposals for development which are not included within Classes B1, B2 and B8 will be permitted if they are for small scale ancillary business facilities that provide a service solely for the employees of the industry/business that is located on the site or if they provide waste management facilities or other sui-generis uses that have similar features to Class B2 or B8 uses. These activities could well generate a level of employment equivalent to B1, B2 or B8 uses and are of a type that either must be located on the site to support the enterprises which are there or would be difficult to locate elsewhere because of their characteristics. I conclude that this is as far as the LPA should go in widening the scope of policy D2. The LPA subsequently proposes, via NAP 115, to further refine the wording of the policy. Since this has not been the subject of public consultation a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.

4. A further objector argues that all of the land not currently developed should be removed from the 'Cokes Site' at Penrhyndeudraeth. That settlement has been designated as a Local Centre. It therefore has a significant role in providing a range of local employment types in order to support local incomes and, thereby, as wide a range of facilities and services as possible. Having regard to the advice of PPW (paragraph 7.1.2) that the number and quality of jobs must be increased and economic inactivity reduced, especially in the less prosperous areas, and also that of paragraph 7.1.5 that economic success of both urban areas and the countryside must be enhanced, I conclude that it is vital to retain the opportunity presented by the Cokes Site for the development of B1, B2 and B8 uses.

### *The provision to be made for ancillary uses*

5. An objector argues that it is necessary for Policy D2 to provide for the development of ancillary uses on the identified sites. The LPA agrees that these could be valuable assets which could help to attract and retain employees and, thereby, support the viability of the employment area as a whole. I agree with the LPA, however, that these should be explicitly restricted in scope so that they cater for the needs for employees of the industries/businesses that are located on the site rather than customers generally in order to avoid the generation of additional vehicular movements which could lead to congestion within the employment areas

and to patterns of business which erode the established town centres. The LPA proposes to secure this via NA 201.

*The effect on registered parks and gardens*

6. An objector argues that NA 201, by envisaging the development of waste management facilities on Policy D2 sites, would erode the setting of the registered park and garden at Vaynol Hall. The adjacent employment area of Parc Menai is, however, subject to policy D1. Proposed Pre-inquiry Change NA 201 does not relate to this. Policy D1 would retain the restriction to B1 uses and supporting small scale facilities. It would retain the requirement that the scale, design and materials, layout and landscaping of any development are of the highest quality in keeping with the local environment.

*The reference to towns outside the plan area*

7. An objector notes that the list of sites which is subject to Policy D2 refers to several settlements which lie outside the area of the UDP, in the area of Snowdonia National Park. No sites are listed in relation to these, however. There is therefore no policy prescription in relation to land outside the UDP area.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0532) that the DD be modified by the acceptance of NA 201;**

**(REC.0533) that no other change be made to the DD in response to these objections.**



**POLICY D3 – ALLOCATION OF ADDITIONAL EMPLOYMENT LAND**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA202; NA203; NA204

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/1216/3	Peter M Welford		180
B/753/3	Colonel R H Gilbertson Welsh Historic Gardens Trust		180
B/1341/3	Wales National Trust	Chris Lambart	180
B/1034/16	Dr Sheila Roberts		180
B/774/1	John D.L. Jones		602
B/604/3	Mathew Saunders Ancient Monuments Society		180
B/756/57	Environment Watch Wales & the Borders		58
B/879/3	Michael Tree		180
B/790/25	Gwynedd Archaeological Trust		180
B/827/3	WL Banks		180
B/844/17	CPRW		180
B/866/34	Snowdonia National Park Authority		583
B/952/6	RCH Douglas Pennant	Guy Evans, Carter Jonas	582
B/140/3	Thomas Lloyd		180

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/870/55	Sustainable Gwynedd Gynladwy		180
B/911/12	Welsh Development Agency		180

## Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/879/2004	Michael Tree		180
B/1034/2025	Wales National Trust	Chris Lambart	180
B815/2003	Joanna Davidson		180
B/774/2006	John D L Jones		105

### Notes

- The following objections are dealt with in the site-specific section of this report which relates to the land at Parc Menai, Bangor: B/1216/3, B/753/3, B/1341/3, B/1034/16, B/604/3, B879/3, B/790/25, B/827/3, B/844/17, B140/3, B/870/55, B/911/12, B/879/2004, B/1034/2025, B/815/2003.
- The following objections are dealt with in the site-specific section of this report which relates to the land at Bryn Llangedwydd: B/774/1, B/774/2006.

### Main Issues

- The research and analysis which underlies the allocation of additional employment land.
- The merits of land adjoining the Cricket Ground at Llandygai as an employment site.
- The scope of the UDP policies.

### Inspector's Considerations and Conclusions

*The research and analysis which underlies the allocation of additional employment land*

1. Policy D3 identifies the additional sites which the LPA proposes should be allocated for employment purposes. An objector expresses the view that these proposals are not supported by research and analysis of the patterns of need for, and the quantity and quality of the existing supply of, land for employment.

2. The Inquiry Background Paper 'Employment (Industrial and Office Land)' presents an account of the studies which have been undertaken to support the preparation of the UDP. In 2000 the LPA carried out the 'Gwynedd Industrial Land Capacity Study' to assess the existing provision of industrial and business sites in the UDP area and also within the adjacent area of the Snowdonia National Park. This was followed by the 'Vacant Land Appraisal 2001' to assess the suitability of available sites to meet the existing and future needs of all employment sectors. The results of these appraisals were important inputs to the DD of the UDP.

3. The Background Paper provides an account of the 'Gwynedd Employment Land Study 2005' which was undertaken on behalf of the LPA by consultants to forecast the demand for employment land in Gwynedd up to 2016 and to re-assess the capacity of existing industrial and business sites. This provided the basis for the

detailed analysis which was undertaken by the LPA to identify the need for the various types of employment site within the various Dependency Catchment Areas of the UDP area. I conclude that the employment land policies of the UDP are based on well documented research and analysis which has been made available to objectors as part of the inquiry process.

*The merits of land adjoining the Cricket Ground at Llandygai, as an employment site*

4. An objector argues that the amount of land proposed for additional employment allocations should be increased and, in particular, that an area adjacent to the Cricket Ground at Llandygai should be subject to this designation. The objector, in particular, identifies the need for additional land for office use to be made available in the Bangor area.

5. The 'Gwynedd Employment Land Study 2005', to which I refer in the preceding sub-section, was based on a detailed sectoral analysis of trends in demand for employment land. It considered that, for the period 2001-2016, some 53ha should be available within the whole of Gwynedd, including the area covered by the Snowdonia National Park Authority. After allowing for take-up of land in the early years of the plan period this was refined to some 40ha for the period 2005-2016 of which 21ha would be for B1 (office and light industry) development, and 19ha for B2 and B8 (general industry, storage and distribution). The study identified a lack of land for office development in the Bangor area. It concluded that some 11.0ha of the 21ha of office land within Gwynedd as a whole should be made available there on high quality sites.

6. The LPA, at DD stage, proposes to meet part of this requirement by the allocation of 3.85ha of land as an extension to Parc Menai. At Pre-inquiry Change stage it proposes to increase this to 7.98ha. For the reasons I give in the section of this report which deals with the site-specific objections to the proposed extension of the Parc Menai site I have concluded that no additional land for employment uses should be allocated there. I have, instead, concluded that the necessary amount of high quality employment land for office uses should be identified from within the committed employment site at Bryn Cegin. That site has an area of some 36ha. At the time of the inquiry, having received a grant of planning permission, it had reached the stage where its supporting infrastructure was being installed. It is said by the 'Gwynedd Employment Land Study 2005' to have the characteristics required to create a high quality business park and the capacity to accommodate the whole of the 11.0ha identified as necessary for this purpose in the Bangor area. The 36ha at Bryn Cegin could accommodate an allocation of that size and still retain more than sufficient capacity to accommodate the 19ha of land for B2 and B8 uses that has been identified as necessary in the whole of Gwynedd, including the National Park area.

7. PPW (paragraph 2.3.2) advises that planning policies and proposals should promote resource-efficient settlement patterns which minimise land take. Because the necessary amount of employment land for all purposes within the Bangor area, including high quality office uses, can be accommodated on the committed Bryn Cegin site, it would not be appropriate to endorse the development of additional land near to the Cricket Ground at Llandygai for this purpose.

*The scope of the UDP policies*

8. An objector argues that it is not appropriate for the UDP to make reference to areas within the Snowdonia National Park. The LPA agrees and, via NA 204, proposes to delete footnote No 1 to Policy D3. I conclude that this will satisfy the concerns of the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0534) that the DD be modified by the acceptance of NA 204;**

**(REC.0535) that no other modification be made to the DD in response to these objections.**

## POLICY D4 - "BAD NEIGHBOUR" SITES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA205

This Section is subject to Further Proposed Changes Nos: NAP37; NAP40; NAP41; NAP42; NAP43; NAP44

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/33	Chris Wynne (North Wales Wildlife Trust)		584

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/172	Welsh Assembly Government		584
B/756/58	Environment Watch Wales & the Borders		59

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/567/2005	Caernarfon Civic Society		8

### Note

- Although the LPA has presented objection B/567/2005 within the Skeleton Report on which this report is based it confirms, in its proof No 8 (paragraph 4.2), that it does not consider this to be a duly made objection to the proposed Pre-inquiry Change NA 205 because it relates to the principle of the use of the land at Griffith's Crossing, Caernarfon as a 'Bad Neighbour Site' whereas that proposed change is limited to presentational aspects of the policy. Having regard to the advice of 'Unitary Development Plans – A Guide to Procedures' (paragraph 1.7) it is clear that the LPA has the discretion as to whether non-duly made objections are considered by the Inspector. In view of the LPA's stance, I will not consider this objection.

### Main Issues

- The integration of the Written Statement and the Proposals Map.
- The effective period of the policy.
- The effect of development on residential amenity.

## Inspector's Considerations and Conclusions

### *The integration of the Written Statement and the Proposals Map*

1. DD Policy D4 presents the LPA's approach to the determination of planning applications for developments involving 'Bad Neighbour Industries'. A list of these is presented in the supporting text. An objector notes that these sites are not identified on the Proposals Map and argues that it is necessary for this to be done. He also contends that, since the list of sites is intended to guide the determination of planning applications, it should be incorporated within the policy itself. I agree that both these changes would improve the clarity of the plan. The LPA proposes to achieve the change to the structure of the Written Statement via NA 205. It has, at that stage, neglected to secure the identification of the sites on the Proposals Map but seeks to achieve this via Further Proposed Changes NAP 37, NAP 40, NAP 41, NAP 42, NAP 43 and NAP 44. Because these Further Proposed Changes have not been the subject of public consultation a full debate, for example on the extent of the coverage of particular sites, has not been possible. If the LPA considers that its proposals in this respect have merit it should pursue them at modification stage.

### *The effective period of the policy*

2. An objector notes that the Cookes Site at Penrhyndeudraeth, which is listed under policy D4, has remained vacant and undeveloped for 3 years. He argues, for this reason, that there is no demand for it and that it should be removed from allocation. The UDP is intended to make provision for the development and use of land for the whole of the period up to 2016. Its current state of vacancy is, therefore, no indication that the allocation is not soundly based.

### *The effect of development on residential amenity*

3. An objector expresses concern that development on the identified 'Bad Neighbour Sites' could harm residential amenity. He argues that the policy should incorporate a caveat that development upon them should not breach the Human Rights Act 1998 (Part 8). This legislation is part of the general framework of law which governs the actions of the LPA. There is, therefore, no need to make a specific reference to it within particular UDP policies. 'Unitary Development Plans – Wales' (paragraph 2.8) advises that policies and proposals of UDPs must be relevant to the development and/or other use of land. They should not duplicate provisions in other legislative regimes. As regards the effect of development proposals on residential amenity, UDP Policy B22 provides that proposals which have an unacceptable impact on the amenities of local communities will be refused.

## RECOMMENDATIONS

**I recommend:**

**(REC.0536) that the DD be modified by acceptance of NA205;**

**(REC.0537) that no other modification be made to the DD in response to these objections.**

**POLICY D5 – SPECIAL LOCATION NEEDS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA206

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/175	Welsh Assembly Government		74
B/734/174	Welsh Assembly Government		74

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2080	CPRW		74

**Main Issues**

- The approach of the plan to the inter-relationship of policy elements.
- The comprehension of the policy.

**Inspector’s Considerations and Conclusions**

*The approach of the plan to the inter-relationship of policy elements*

1. DD Policy D5 presents the LPA’s approach to the determination of planning applications for industries or businesses that have special locational needs. It defines these as cases where these must be located close to their source of raw materials or other natural resources. The second criterion of the policy gives priority to the use of previously developed land. An objector argues that this is but one of a wide range of necessary criteria. He gives the example that the minimisation of the use of best and most versatile agricultural land is also an important factor.

2. Paragraph 6.2.2 of the DD emphasises that policies should not be read in isolation. Plan users should read the document as a whole. Policy C3 expresses the priority to be given to the re-use of previously developed land. For these reasons I agree that there is no need to refer to this within Policy D5. I note that the LPA proposes to secure the removal of this criterion via NA 206. The remainder of that policy would, if that proposed Pre-inquiry Change was accepted in full, contain an obvious duplication of wording. However, due to the absence of any duly made objection to this it is not for me to address the matter.

*The comprehension of the policy*

3. The DD version of this policy omits the necessary word 'if' between the word 'approved' and 'all'. This would be remedied by the acceptance of NA 206.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0538) that the DD be modified by the acceptance of NA 206 insofar as it relates to the re-wording of the initial sentence and the deletion of criterion 2 of Policy D5;**

**(REC.0539) that no other modification be made to the DD in response to these objections.**



## **POLICY D6 – EXPANSION OF EXISTING ENTERPRISES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### **Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/954/7</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddely, Nathaniel Lichfield and Partners</b>	

### **Note**

- This policy is numbered as D8 in the Welsh version of the DD.

## **POLICY D7 – INDUSTRIAL/BUSINESS UNITS WITHIN DEVELOPMENT BOUNDARIES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA207; NA209

### **Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/176</b>	<b>Welsh Assembly Government</b>		<b>75</b>

#### **Note**

- Objection B/734/176 is made to DD Policy D8 (Rural Workshops or Small Scale Industrial/Business Units Outside Development Boundaries). It is dealt with in the section of this report which relates to that policy.
- This policy is numbered as D6 in the Welsh version of the DD.

**POLICY D8 – RURAL WORKSHOPS OR SMALL SCALE INDUSTRIAL/BUSINESS UNITS OUTSIDE DEVELOPMENT BOUNDARIES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/59	Environment Watch Wales & the Borders		53

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/870/57	Sustainable Gwynedd Gynladwy		

**Notes**

- Objection B/734/176 is dealt with in this section of the report. It is responded to in LPA proof 75.
- Although not identified in the box heading above, the Council proposes to amend this Policy and supporting text by introducing NA 207.
- Objection B/870/56 is dealt with in this section of the report. It is responded to in LPA proof 604.
- This policy is numbered as D7 in the Welsh version of the DD.

**Main Issue**

- Whether the DD is appropriate, having regard to the concept of local need.

**Inspector's Considerations and Conclusions**

1. DD Policy D8 provides that proposals to build workshops or small scale industrial/business units outside Development Boundaries will be approved provided that there is a proven local need for the development and the proposed site is the most suitable location to fulfil that need. An objector argues that difficulties may arise in determining whether a particular planning application will meet a local need and in ensuring that the units which were approved are occupied by enterprises that meet such needs in perpetuity. The LPA agrees that the concept of local need is not the appropriate one. It proposes, via NA 207 to, among other things, delete the reference to local need and replace it in the supporting text with the concept of 'small scale, non-speculative employment'. I conclude that this will ensure that the units approved are limited to those which meet a need which has

been identified prior to the submission of the planning application. This would prevent employment development in the open countryside except in circumstances where this would clearly support the local economy.

2. The LPA, in its proof No 75, expresses the view that DD policies D8 and D10 deal with the adaptation of existing buildings outside Development Boundaries and, therefore, to avoid confusion it is necessary to delete DD Policy D10. The LPA proposes to achieve this via NA 209. However, that latter policy deals with buildings in both rural and urban locations. The supporting text (paragraph 6.2.26) refers to buildings in towns and villages as well as in the rural areas that could be suitable for industrial or business use. It is clear, therefore, that DD Policy D10 is not limited in scope to only land that it outside of a Development Boundary. Furthermore DD policy D8 relates to the *building* of workshops or small scale industrial/business units (outside of Development Boundaries) whereas DD Policy D10 refers to the *conversion* of buildings for that purpose. It is clear therefore that DD Policies D8 and D10 are intended to serve very different purposes in different locations. There is, therefore, no basis in the LPA's arguments to justify NA 209.

3. At Pre-inquiry Proposed Change stage, in relation to the English version of the plan the LPA, via NA 207, proposes to change the wording of DD Policy D8 and rename it as Policy D7. Its various proposed Pre-inquiry Changes leave the status of DD Policy D7 in a state of complete uncertainty. It is not possible to determine from them whether the LPA intends that this latter DD policy should remain in the plan or be deleted. The LPA should give consideration to this matter and, if necessary, clarify its intentions at modification stage.

## RECOMMENDATIONS

I recommend:

**(REC.0540) that the DD be modified by the acceptance of NA 207 subject to further consideration being given by the LPA to the policy number to be assigned to the text of DD Policy D8, having regard to whether the DD Policy D7 is or is not to remain in the plan;**

**(REC.0541) that no other modification be made to the DD in response to these objections and, in particular, that NA 209 be not accepted.**

## POLICY D9 – FARM BUILDINGS AND STRUCTURES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA208

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/177	Welsh Assembly Government		206

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/58	Sustainable Gwynedd Gynladwy		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/2039	Gwynedd Archaeological Trust		206
B/844/2081	CPRW		206

### Main Issue

- Whether the DD is appropriate, having regard to wording of the test of necessity for the development.

### Inspector's Considerations and Conclusions

1. DD Policy D9 provides that proposals to erect buildings and structures for agricultural purposes will be approved, provided that a genuine agricultural need for the development can be proven and all of the stated criteria can be met. An objector argues that regard should be had to the terms of the General Permitted Development Order 1995 (Part 6) which requires simply that the development is reasonably necessary for the purposes of agriculture within that unit. The LPA agrees and, via NA 208, proposes to introduce this amendment. I conclude that this will satisfy the concerns of the objector. Further objectors express concern that the proposed changed wording would lack clarity. It is, however, a form of words that has been applied over a very considerable period of time via the implementation of the above Order. There is, therefore, a substantial body of case law which will aid consistent application of the policy.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0542) that the DD be modified by the acceptance of NA 208;**

**(REC.0543) that no other modification be made to the DD in response to these objections.**

**POLICY D10 – CONVERSION OF BUILDINGS FOR INDUSTRY OR BUSINESS USE**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA209

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/178	Welsh Assembly Government		76

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/870/59	Sustainable Gwynedd Gynladwy		

**Main Issue**

- Whether the DD is appropriate, having regard to the relevance of the criterion relating to redundancy.

**Inspector's Considerations and Conclusions**

1. DD Policy D10 provides that proposals for the change of use of buildings for small scale industry or business use will be approved if the chosen location can be justified and all the stated criteria can be met. Criterion 3 requires that the building must be redundant and/or no longer required for its original purpose. The objector argues that, having regard to the advice of TAN6 (paragraph 12), it is not normally necessary to consider whether a building is no longer needed for its present agricultural or other purpose. That advice relates only to the re-use/adaptation of rural buildings - DD Policy D10 relates to buildings in both rural and urban locations. Given that in urban areas the change of use of buildings from one active use to another is a necessary and acceptable form of development, and that criterion 2 would safeguard the character and appearance of its surroundings and the amenity and functioning of adjacent land uses, criterion 3 is not relevant or necessary in either sort of location. I conclude that it should be deleted from the policy.

2. The LPA considers that DD Policies D8 and D10 deal with similar matters and, therefore, that D10 should be deleted. It proposes NA 209 to achieve this. For the reasons I give in the section of this report which relates to Policy D8 I have concluded that this would not be appropriate.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0544) that the DD be modified by the deletion of criterion 3 of Policy D10;**

**(REC.0545) that no other modification be made to the DD and, in particular, that NA 209 be not accepted.**



## POLICY D11 – HOME BASED BUSINESS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA210

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/60	Sustainable Gwynedd Gynladwy		77

### Main Issue

- Whether the DD is appropriate, having regard to the clarity of the text.

### Inspector's Considerations and Conclusions

1. DD Policy D11 presents the approach to be taken by the LPA to the determination of planning applications which propose the use of part of a dwelling for small, home-based businesses. The objector notes that there are grammatical problems with the text of the supporting paragraph 6.2.29. The LPA agrees and proposes to remedy this via NA 210. I conclude that this would secure the necessary clarity of policy expression.

### RECOMMENDATIONS

I recommend:

**(REC.0546) that the DD be modified by the acceptance of NA 210;**

**(REC.0547) that no other modification be made to the DD in response to these objections.**

## POLICY D12 – ATTRACTIONS AND FACILITIES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA212

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/783/10	Welsh Language Board		588
B/954/8	Bourne Leisure Ltd	Margaret Baddely, Nathaniel Lichfield and Partners	588

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1030/10	Univeristy of Wales Bangor	Sian Kilner, Kilner Planning	588

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/61	Sustainable Gwynedd Gynladwy		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/954/2013	Bourne Leisure Ltd	Margaret Baddeley (Nathaniel Lichfield & Partners)	588

### Main Issues

- Whether the Policy's approach to accessibility is appropriate.
- Whether the Policy is unduly restrictive on existing facilities outside Development Boundaries.
- Whether the Policy applies to caravan sites.
- Welsh language and local community considerations.
- The footnote reference to the Gwynedd Tourism Strategy.

## Inspector's Considerations and Conclusions

### *Whether the Policy's approach to accessibility is appropriate*

1. An objector contends that the Policy's approach to public transport accessibility conflicts with that which specifically deals with the subject, Policy CH30. The Council denies that criterion 4 of D12 conflicts with CH30 for reasons that are not clearly explained in its Proof of Evidence. Whereas D12 requires that a site is "genuinely accessible to a variety of modes of transport", CH30 requires that there is an adequate public transport system in place or a clear possibility of a future provision in circumstances where a proposal would lead to a substantial increase in trips involving private motor vehicles. It goes on to require that consideration is given to public transport in the layout of a scheme and to means of securing necessary improvements to the system. In my opinion this matter is best dealt with by the more comprehensive approach set out in CH30 and that either criterion 4 is deleted from D12 or that it takes the form of a cross-reference to the relevant policy.

2. Another objector considers that in the case of schemes that would represent the enhancement of an existing facility that the need for accessibility to a variety of transport modes should not apply. I consider that the approach set out in CH30 deals with this point in a way that strikes a reasonable balance between permitting an existing enterprise to develop and ensuring that the principles of sustainable transport are followed. Unlike criterion 4 of the D12, reliance on CH30 would mean that schemes that would not give rise to a significant increase in traffic, for instance a modest enhancement to existing facilities designed to retain rather than substantially increase visitor numbers, would not be required to be served by public transport.

### *Whether the Policy is unduly restrictive on existing facilities outside Development Boundaries*

3. Objectors consider the Policy to be unduly restrictive, particularly in relation to development outside the boundaries of settlements. The Council emphasises the importance of striking a balance between permitting tourist attractions and facilities whilst seeking to prevent development that would be harmful to the built or natural environment. In its revised form the Policy is less restrictive than the DD version. It seeks to allow development outside settlements only if there are no suitable locations within the settlement and that it falls within one of 3 categories. In broad terms, these are that the development utilises an existing building or previously developed land; that the scheme is dependant on a "historical or natural activity"; or that it forms an extension to an existing building or is related to an existing tourist facility.

4. An objector maintains that the Policy, in its revised form, is too restrictive. I disagree, although I consider that the criteria could be better expressed. All 3 criteria would benefit from being rewritten not only so that they relate better grammatically to the phrase to which they are linked by the colon punctuation mark, but also so that they are more clearly expressed. For instance, in criterion 3 the terms 'resource' and 'natural activity' are unsuitable in this context and the first "or" should read "of". Criterion 2 should be amended to make it clear that it includes the provision of attractions or facilities to serve an existing tourist enterprise, including that providing visitor accommodation. As presently drafted

the Policy contains a contradiction – it states, without qualification, that proposals that meet one of the criteria listed as 1., 2. or 3. will be approved. However, it is clearly the intention that such proposals should also meet every requirement set out in 4. to 7. - this should be made clear in the Policy. I have assumed that the reference in the heading of the Policy in NA 212 to “Amenities” is in error and that there is no intention to change the word “Facilities” that appears in the earlier version of the Plan.

5. Criterion 4 requires all proposals to be consistent with the Gwynedd Tourism Strategy in terms of developing identified ‘niche’ markets or supporting an identified theme at a specific destination. I agree with an objector that, in terms of allowing existing enterprises to continue to develop to meet the changing demands of its customers, this is an unduly onerous requirement. In this respect it would run counter to the Plan’s stated aim of sustaining a thriving tourism industry. It seems to me that an exception to this requirement should be made for attractions or facilities that are ancillary to existing enterprises.

*Whether the Policy applies to caravan sites*

6. An objector considers that explanatory paragraph 6.3.5 should make it clear that the Policy does not apply to caravan sites. Attention is drawn to an officer comment included in a report to the Council’s Environment Committee which considered objections to the Deposit Draft version of this Policy. It stated that the Policy is “not applicable to caravan sites”. In response the Council in its Proof of Evidence explains that the quoted extract of the committee report contained an error in the translation from Welsh. It ought to have read: “this Policy is not applicable to proposals for caravan sites”. The distinction that it seeks to draw between these 2 versions is significant – it means that the Policy is intended to apply to ‘attractions and facilities’ *on* caravan sites but not proposals *for* caravan sites. This approach is consistent with the layout of the Plan which deals with D12 under the heading “Attractions and Facilities” whereas the various types of tourist accommodation are addressed under the separate heading of “Visitor Accommodation”. Nevertheless, rather than leaving the distinction to be inferred by the reader, I consider that this should be clearly stated within the Plan, probably within the explanatory text to D12.

*Welsh language and local community considerations*

7. The Council explains that it has decided not to include criteria in policies where such matters are addressed by other policies. In response to an objection it points out that matters relating to the impact on the Welsh language and local communities are covered by Policy A2. As the Council goes on to note, the preamble to the Tourism sub-section makes it clear that the Plan should be read as a whole. The preamble also identifies A2 as a key policy consideration, although it wrongly refers to the Policy’s title in the Deposit Draft, correcting this in NA 211. The issue of consistency in terms of listing criteria addressed in other policies is one that frequently arises in this report. In this case, in the interests of conciseness, I agree with the Council that it is not necessary that these considerations be identified among the criteria of D12.

*The footnote reference to the Gwynedd Tourism Strategy*

8. The Gwynedd Tourism Strategy is mentioned in the Policy with a cross-reference to a footnote that outlines the relevance of the Strategy. An objector suggests: the deletion of the footnote; the provision elsewhere of a fuller summary; and the revision of the Policy to require schemes to be consistent with the Strategy. This last suggestion goes further than both the Deposit Draft and Pre-inquiry Proposed Change versions of the Plan which require proposals to be consistent with the Strategy's aims insofar as it seeks to develop niche markets or an identified theme for specific destinations. In its Proof of Evidence the Council agrees to delete the footnote and explains that it intends to present a list of terms at the end of the document. Indeed it suggests that NA 212 deletes the footnote reference but this is not the case. It seems to me that the approach in the Pre-inquiry Proposed Change version of the Policy to the Strategy is appropriate as is the retention of the footnote, and that no alteration is required in this respect.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0548) that the DD be modified by the acceptance of NA 212 as further amended by:**

- **rewording criteria 1. to 3. so that they relate better to the preceding sentence, are expressed more clearly and so that criterion 2 makes it clear that it includes the provision of attractions or facilities to serve existing tourist enterprises, including those providing visitor accommodation;**
- **rewording the policy so that it makes it clear that whilst proposals are required to meet only one of the requirements listed 1. to 3., every proposal is expected to meet the remaining requirements;**
- **clarifying that proposals that would provide attractions or facilities that would be ancillary to existing tourist enterprises would not be expected to satisfy the requirements of criterion 4;**
- **deleting criterion 7 or replacing it by a reference to the need to comply with Policy CH30;**
- **the insertion of a sentence within the Policy's explanatory text to state that the Policy does not cover the provision of visitor accommodation.**

**(REC.0549) that no other modification be made to the DD in response to these objections.**

## POLICY D13 – SERVICED ACCOMMODATION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA213

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/246/5	Jan Tyrer		207
B/734/179	Welsh Assembly Government		207
B/870/62	Sustainable Gwynedd Gynladwy		207

### Note

- It appears that the text set out in relation to the Policy in NA 213 is incomplete. In the DD version points 1. and 2. follow points a. and b. As 1. and 2. are not shown as being deleted in NA 213 I have treated their omission as an error and have dealt with the Pre-inquiry Proposed Change on the basis that it is intended that these criteria are retained.

### Main Issue

- Whether the Policy's approach to accessibility is appropriate.
- The reference to "self serviced" accommodation.

### Inspector's Considerations and Conclusions

#### *Whether the Policy's approach to accessibility is appropriate*

1. Objection is raised to the Policy's third criterion which requires that the site is accessible by a variety of modes of transport other than the car. It is contended that it is unrealistic to expect all new serviced accommodation within the Plan area to meet this requirement. In this respect I consider it significant that the explanatory text refers to a shortage of quality hotels and other serviced accommodation and explains that, given the potential economic benefits that they can provide, the Policy is supportive in principle of such development. One objector suggests that the criterion should be qualified such that special circumstances or business viability could be used to justify an exception to its general aim. Another objector considers that demonstrating a reduced ecological footprint of the development could justify use of private cars. Given that criterion 1 requires new build schemes to be located within a Development Boundary or to make use of previously developed land it is clear that the potential for the dispersal of such accommodation to remote locations will be limited. NA 213 suggests qualifying the requirement by adding "unless there are exceptional circumstances" and explaining that this may apply to small-scale proposals.

2. For reasons I set out in relation to Policy D12, it seems to me that in order to achieve a consistent and comprehensive approach to this issue, the Policy should rely on Policy CH30. This policy, which takes into account the materiality of any increase in car use, strikes an appropriate balance between permitting the development of serviced accommodation which is seen as beneficial to the area's economy whilst encouraging sustainable transport patterns. It will be necessary to either delete criterion 3 or replace it with a cross-reference to CH30. It will also be necessary to amend the explanatory text as set out in NA 213 to reflect this change.

*The reference to "self serviced" accommodation*

3. The mistaken reference to "self" in relation to serviced holiday accommodation noted by an objector, which appears in the English Deposit Draft version of the Plan, is corrected by NA 213.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0550) that the DD be modified by the acceptance of NA 213 as further amended by:**

- **the retention of criterion 1. and 2. as set out in the DD;**
- **the deletion of criterion 3 and, if considered necessary, its replacement with a reference to the need to comply with Policy CH30;**
- **the modification of the explanatory text to reflect the change recommended in the first bullet point above;**

**(REC.0551) that no other modification be made to the DD in response to these objections.**

## POLICY D14 – SELF-SERVICED HOLIDAY ACCOMMODATION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA214

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/783/9	Welsh Language Board		589
B/948/1	Mr Myfyr Jones	Berwyn Owen, Owen Davenport Ltd	589

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/64	Sustainable Gwynedd Gynaladwy		589
B/870/63	Sustainable Gwynedd Gynaladwy		589

### Note

- Although objection B/948/1 is not an objection to this Policy per se I have dealt with it under this section on the basis that it deals with self-serviced holiday accommodation.

### Main Issues

- Is the reference to "overprovision" sufficiently precise.
- Welsh language and local community considerations.
- Whether self-serviced holiday parks should be treated as falling within the open countryside.
- Should paragraph 6.3.12 be re-written.

### Inspector's Considerations and Conclusions

*Is the reference to "overprovision" sufficiently precise*

1. There is no dispute that the Policy ought to seek to prevent an overprovision of self-serviced accommodation, but an objector considers that greater detail is required on the matter. The Council has sought to address this concern in its Pre-inquiry Proposed Changes. NA 214 inserts an additional sentence to a supporting paragraph – "Results of surveys undertaken by the Council and other organisations



will be considered". The inadequacy of the wording of this sentence is a matter I address in the third main issue. Setting that to one side it is evident that this sentence does not align with the Council's Proof of Evidence on this point; it refers to using in-house sources of information *only* when assessing overprovision. It seems to me that the explanatory text should provide greater clarity on the sources of information that it will use to measure 'provision'.

2. A critical aspect that is not covered by the Council's response is what is meant by "overprovision". Firstly it is necessary to define this so that its relevance to planning is clear. Without such a definition objections could arise on the sole ground that overprovision would harm the business interests of an existing enterprise. I presume that what the Policy seeks to avoid is harm that can be caused by the cumulative effect of too great a concentration of such accommodation in a given area ie when saturation point is reached. This raises the issue of whether 'overprovision' is the most suitable term in this respect. Paragraph 6.3.12 refers to "a concentration and/or overprovision" – this suggests a distinction between "concentration" and "overprovision" although it appears to attach no significance to that distinction. It seems to me that the reference to both terms serves only to introduce confusion and is unnecessary. Defining what the Council seeks to address in this respect will enable it to decide whether, for instance, 'over-concentration' would be a better term. Once this is clarified, it should indicate the criteria that will be used to measure whether a proposed provision would be excessive - that is, the methodology adopted to determine when overprovision/over-concentration has been or is likely to be reached. It appears to me that a phrase used in criterion 4 of D18 may be apposite – "will not exceed the capacity (e.g. environmental, social and cultural, road network, amenities etc.) of that locality to reasonably accommodate such developments."

*Welsh language and local community considerations*

3. The Council explains that it has decided not to include criteria in policies where such matters are addressed by other policies. In response to an objection it points out that matters relating to the impact on the Welsh language and local communities are covered by Policy A2. As the Council goes on to point out, the preamble to the Tourism sub-section makes it clear that the Plan should be read as a whole. It also identifies A2 as a key policy consideration, although it wrongly refers to the Policy's title in the Deposit Draft, correcting this in NA 211. The issue of consistency in terms of listing criteria addressed in other policies is one that frequently arises in this report. In this case, in the interests of conciseness, I agree with the Council that it is not necessary that they be identified among the criteria of D14.

*Whether self-serviced holiday parks should be treated as falling within the open countryside*

4. With a few exceptions holiday parks are normally found outside settlements even though some, such as an objector's site, may lie close to Development Boundaries. I agree that, in terms of their appearance, they are significantly different from the open countryside. Nevertheless, as they lie outside settlements, they must be regarded as being within such an area – this position is consistent with PPW. Using as an example its approach to housing, PPW seeks to strictly control housing in the countryside away from existing settlements or other areas allocated for development. The Council is anxious to prevent excessive

development in the countryside, partly to conserve its natural beauty which is a crucial tourist attraction. This is a reasonable position for it to take and I see no reason to find that it ought, as a matter of policy, to exclude holiday parks from the restrictive approach to development within the countryside. That is not to say that there will not be circumstances when a development may be justified within such a park that would otherwise be deemed unacceptable. Indeed the Council confirms that a holiday park's location within the open countryside would not preclude further development within it but rather that each proposal would be judged against the relevant policies of the Plan.

5. I note the contention of an objector that a particular holiday park should be included within the Development Boundary of the Village of Caeathro. I have, in the sections of this report which relate to site-specific objections to the alignment of Development Boundaries concluded that, as a matter of principle, these should be drawn so as to tightly enclose the built-up areas of settlements. The inclusion of a holiday park within such a boundary would establish the principle that it could be redeveloped for other purposes, including housing. Having regard to my conclusions in respect of the overall requirement for and supply of land for housing and the desirable distribution of new housing development this would not be acceptable.

*Should paragraph 6.3.12 be re-written*

6. As has been noted by an objector this paragraph in the Deposit Draft version contains several drafting errors. Unfortunately, contrary to the Council's assertion in its Proof of Evidence, not all are addressed by the Pre-inquiry Proposed Change version. For instance the precise meaning of the first sentence is not clear to me, it begins – "Existing national guidance and priority given to the conversion ....". Another example is an additional sentence that has been introduced by NA 214 at the end of the paragraph and which appears to be incomplete, further elaboration is necessary. The whole paragraph would benefit from careful proof reading and correcting.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0552) that the DD be modified by the acceptance of NA 214 as further amended by the following:**

- **That the explanatory text defines the meaning of "overprovision" in this context, using another term if considered to be more apposite, and provides greater detail on the methodology and information that will be used to assess proposals in this respect;**
- **That paragraph 6.3.12 is corrected in line with the comments set out in the fourth main issue above.;**

**(REC.0553) that no other modification be made to the DD in response to these objections.**

**POLICY D15 – NEW STATIC CARAVAN AND HOLIDAY CHALET SITES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA215

This Section is subject to Further Proposed Changes Nos: NAP70; NAP71

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/961/4</b>	<b>British Holiday &amp; Home Parks Assoc. Ltd, Gwynedd &amp; Mon Branch</b>	<b>Charles F Jones &amp; Son</b>	<b>24</b>
<b>B/783/5</b>	<b>Welsh Language Board</b>		<b>590</b>
<b>B/866/35</b>	<b>Snowdonia National Park Authority</b>		<b>590</b>
<b>B/954/9</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley, Nathaniel Lichfield &amp; Partners</b>	<b>590</b>

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/961/2010</b>	<b>British Holiday &amp; Home Parks Assoc. Ltd, Gwynedd &amp; Mon Branch</b>	<b>Charles F Jones &amp; Son</b>	<b>24</b>
<b>B/954/2014</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley (Nathaniel Lichfield &amp; Partners)</b>	<b>590</b>
<b>B/734/2207</b>	<b>Welsh Assembly Government</b>		<b>590</b>

**Notes**

- The Council has introduced NAP 121 in addition to the Further Proposed Changes identified in the box heading above. I have based my consideration of this change on the version that appears in the Council's schedule of Further Proposed Changes, not that which appears in its Proof of Evidence.

- In addition to the above representations, I have also taken into account objection B/954/10 insofar as it relates to the contribution of static caravans in meeting the demand for self-catering accommodation.
- Footnote 1 to the Policy contains an error in the title of the Act – it should read “Caravan Sites and Control of Development Act 1960”.

### **Main Issues**

- Whether the Policy is too restrictive in relation to the provision of new static caravan and holiday chalet sites.
- Increasing the number of static caravans or holiday chalets on existing sites.
- Exchanging touring pitches for static caravans or holiday chalets units.
- Welsh language and local community considerations.
- Landscape impact from views within the National Park.
- Whether the Pre-inquiry Proposed Change should be amended.

### **Inspector's Considerations and Conclusions**

*Whether the Policy is too restrictive in relation to the provision of new static caravan and holiday chalet sites*

1. Objection is raised to the Policy's blanket restriction on new static caravan and holiday chalet sites on the basis that it fails to take account of local variations in the quality and distribution of existing sites. The Council maintains that the Plan area is well catered for in this respect and cites the data compiled by a recent 'Visitor Bed Stock Survey'. The Gwynedd & Ynys Môn Branch of the British Holiday & Home Parks Association Ltd does not oppose the Policy's approach to new sites. On the basis of the evidence before me and my knowledge of the area, I have no reason to reach a different view to the Council. TAN13: Tourism advises that in preparing development plans the adequacy of static caravan facilities should be investigated and reconciled with the need to protect the environment, and that "special consideration" needs to be given to new sites. I consider that, in an area that has seen considerable provision of static caravan sites in the past, the Council's approach aligns with national advice. Moreover, as there is no dispute that there are sites within the area that are in need of improvement, a policy of preventing the establishment of new sites is more likely to result in investment in the existing provision. This would lead to the upgrading of facilities and better landscaping, creating economic and environmental benefits for the area. Policy D16 provides for such a situation.

*Increasing the number of static caravans or holiday chalets on existing sites*

2. Objectors contend that the Plan should adopt a different approach to proposals to increase the number of static caravans and holiday chalets on existing sites compared to proposals for new sites. On the basis that there may be circumstances where the former may provide opportunities for improvements to an existing site, it is suggested that either a new policy is introduced to deal with it or that it should be dealt with under Policy D16. Given the changes proposed by Pre-inquiry Proposed Changes to D16 it is clear that the Council no longer wishes to adopt a blanket prohibition on any increase in the number of static caravans or holiday chalets on existing sites, albeit that an such increase would be strictly controlled. The effect of the Pre-inquiry Proposed Change to D16 is that it contradicts D15. The revised approach to D16 seems to me to be soundly-based

and, thus, I consider that any reference to an increase in units on existing sites should be omitted from D15. Criterion 2 should be deleted, the title should revert to that used in the DD version and the necessary changes to the final sentence of supporting paragraph 6.3.14 should be undertaken to reflect this change.

*Exchanging touring pitches for static caravans or holiday chalets units*

3. For the same reasons as outlined in relation to the second main issue above objectors contend that proposals to exchange touring pitches for static caravans or holiday chalets units should be dealt with differently to schemes for new sites. The Council's Proof of Evidence 590 considers D15 to be adequate to deal with such exchange proposals but does not address the circumstance where, as part of the exchange, improvements are offered, for instance upgrading facilities or reducing the visual impact. Although there is no indication that there is a need to preserve the present provision of touring pitches and so prevent exchange schemes, in principle, there are significant differences in appearance between sites accommodating static caravans/holiday chalets and touring caravans. The markedly larger physical size of the former means that they tend to be visually more conspicuous, this is emphasised by a tendency to have a greater degree of permanence with more manifestations of domesticity surrounding them. Furthermore, they are an all-year round feature unlike touring units that tend to be most used during the warmer months when hedging and trees provide greatest screening. Nevertheless, it seems to me that circumstances may arise where the benefits of exchanging a number of touring pitches for, perhaps fewer, static caravans/holiday chalets would give rise to improvements to a site in much the same way as an increase in the number of units on a holiday park. It follows that such exchanges are best covered by D16.

*Welsh language and local community considerations*

4. The Council explains that it has decided not to include criteria in policies where such matters are addressed by other policies. In response to an objection it points out that matters relating to the impact on the Welsh language and local communities are covered by Policy A2. As the Council goes on to point out, the preamble to the Tourism sub-section makes it clear that the Plan should be read as a whole. It also identifies A2 as a key policy consideration, although it wrongly refers to the Policy's title in the Deposit Draft, correcting this in NA 211. The issue of consistency in terms of listing criteria addressed in other policies is one that frequently arises in this report. In this case, in the interests of conciseness, I agree with the Council that it is not necessary that they be identified among the criteria of D15. Furthermore, as the effect of the Policy is to prevent development elaboration on any specific consideration is not necessary.

*Landscape impact from views within the National Park*

5. As explained above the Council has decided not to include criteria in policies where such matters are addressed by other policies. In the interests of conciseness it seems to me reasonable that, in this case, the same approach is adopted in considering whether it is necessary to supplement the explanatory text. Pre-inquiry Proposed Change NA 99 introduces a Policy that deals with the impact of development on the National Park. In any event as the effect of D15 is to prevent development it is not necessary to elaborate on this particular consideration.

*Whether the Pre-inquiry Proposed Change should be amended*

6. For reasons set out in my consideration of the preceding main issues I consider that the Policy ought to be significantly modified. The minor modifications set out in the Pre-inquiry Proposed Changes do not alter my findings in this respect. Whilst I have noted the objections raised in response to NA 215 it is not necessary for me to address these concerns given the need for fundamental changes to the Policy as detailed in my Recommendations below. As Further Proposed Changes NAP 70, 71 and 121 are all minor corrections to the Policy, it follows that it is not necessary for me to comment on their merit.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0554) that the DD be modified by:**

- **deleting the text of the Policy in its entirety and replacing it with "Proposals for the development of new sites for static holiday caravan (single or twin caravan) units<sup>1</sup> or holiday chalets<sup>2</sup> will be refused.";**
- **amending the final sentence of paragraph 6.3.14 to reflect the change to the Policy;**
- **correcting the reference to the Footnote 1 to "Caravan Sites and Control of Development Act 1960";**

**(REC.0555) that no other modification be made to the DD in response to these objections and, in particular, that NA 215 and NAP 70,71 and 121 be not accepted.**

**POLICY D16 – STATIC CARAVAN UNIT SITES: EXTENSIONS OR  
RELAOCATION**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA216

This Section is subject to Further Proposed Changes Nos: NAP13

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/954/10</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley, Nathaniel Lichfield and Partners</b>	<b>591</b>
<b>B/866/36</b>	<b>Snowdonia National Park Authority</b>		<b>591</b>
<b>B/961/5</b>	<b>British Holiday &amp; Home Parks Assoc. Ltd, Gwynedd &amp; Mon Branch</b>	<b>Charles F Jones &amp; Son</b>	<b>42</b>

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/961/2011</b>	<b>British Holiday &amp; Home Parks Association Ltd</b>	<b>Charles F Jones &amp; Son</b>	<b>42</b>
<b>B/954/2016</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley (Nathaniel Lichfield &amp; Partners)</b>	<b>591</b>

**Notes**

- The Council's Proof of Evidence 591 purports to reproduce NAP 13, but it wrongly numbers the supporting paragraphs so that they appear to be part of the Council's statement rather than an extract from the Plan. This has caused confusion to one objector who suggests that the recognition of the vital contribution of holiday sites set out in paragraph 4.3.15 of the Proof ought to be set out in the Plan – in fact it is already contained in paragraph 6.3.15 of the DD and is not affected by subsequent changes.
- Policy D15 deals with 'static holiday caravans units and holiday chalets', whereas this Policy refers only to 'static caravan units'. The reason for distinguishing between the scope of the policies in this way is not clear to me; on the basis of the representations that I have received both policies appear to be concerned with the same type of visitor accommodation. Generally I have sought to use the term that appears in the policy when

dealing with that policy, aware that there may be inconsistencies between reporting cells. I am also aware that the precise term used varies within policies and their titles. To avoid confusion it is suggested that the terminology used in these and subsequent policies is checked and, where necessary, changes are incorporated to ensure consistency of expression. Alternatively explanations should be provided of any distinctions which the Plan has sought to draw in this respect.

- It is evident that the first sentence of paragraph 6.3.16 of the DD is not accurately replicated by NA 216. I have treated this as an error of draftsmanship rather than an intentional alteration.

## **Main Issues**

- Whether physical extensions to site area should be a once only allowance or be limited in size.
- Increasing the number of static holiday caravan units on existing sites.
- Exchange schemes to allow the replacement of touring pitches with static holiday caravan units.
- Landscape impact from views within the National Park.

## **Inspector's Considerations and Conclusions**

### *Introduction*

1. The Council considers that there is an adequate supply of static holiday caravan units within the Plan area and thus does not seek to increase the provision. For reasons I set out in my comments on D15 I consider this approach in broad terms to be acceptable. As part of its Pre-inquiry Proposed Change the Council has refined its blanket opposition to any increase in the provision of such units recognising that there will be circumstances where modest increases are justified. It is evident that elements of these changes do not sit easily within the retained text of the Deposit Draft version. I have assumed that the striking through of the number 3. in that bullet point means that the new text which begins "in limited circumstances ....." is intended to be distinct from the list of criteria. The precise meaning of this new sentence is difficult to follow. This is partly due to the reference to "limited circumstances". This is misleading because the apparent meaning is that a proposed development will be acceptable provided that it meets the requirements of the sentence. However, the phraseology used suggests some arbitrariness as to whether such compliant schemes would be accepted.

2. Clarity would also be improved by introducing the first reference to an increase in the number of units earlier in the Policy under the first set of bullet points which lists the types of proposals with which the policy is concerned. I suggest that point c. is added to address minor increases in the number of units. It would also appear that the reference in the revised point 3. to any increase being "consistent with the improvements to the site" is a requirement that could be woven into the criteria set out in the second set of bullet points, and could be re-phrased along the lines that any increase is 'commensurate in scale' with the improvements to the site.

3. In the interests of accuracy the reference to "curtilage" in relation to proposals to extend the area of sites ought to be omitted. The Concise Oxford



English Dictionary defines it as "an area of land attached to a house and forming enclosure with it"; it is clearly inappropriate in the context of this Policy.

4. In my consideration of the main issues below I have taken into account, insofar as is relevant, the extract provided of the Inspector's report on the Ynys Môn Unitary Development Plan (UDP) together with the accompanying observations of the objector and the Council's response.

*Whether physical extensions to site area should be a once only allowance or be limited in size*

5. There is no dispute that there will be circumstances where minor extensions to the size of a static holiday caravan unit can provide an opportunity to improve the overall appearance of holiday parks by reducing density and allowing for additional landscaping. This not only improves the environment for visitors but also the site's wider landscape impact. In its Proof of Evidence 590 the Council acknowledges that there are many sites within its area that lie in coastal or visually prominent locations, and that many are ill-equipped to meet future market requirements.

6. Both the DD and Pre-inquiry Proposed Change versions of the Policy seek to permit minor extensions to a static holiday park site on a "one-off" basis only. The Council has offered Further Proposed Change NAP 13 which deletes the reference to "one-off". I agree that a once only limitation is not a reasonable stipulation. The allowance is specifically aimed at permitting a modest increase in the size of a site to enable it to be upgraded. Having permitted one extension on the basis that it was justified by improvements to the site, it would be necessary to assess any subsequent proposals for extensions against the benefits that were linked to such a scheme. There could be no justification in resisting a subsequent scheme which was deemed to offer significant benefits to the area merely because an earlier scheme had already been allowed. Thus, although I am mindful that it will be necessary to consider any responses made to NAP 13 when it is subjected to public consultation through the proposed modifications, on the basis of the evidence before me, I consider the deletion of the reference to "one-off" to be a necessary alteration to the Policy.

7. An explanation of the term "minor" in relation to permitted extensions is provided in supporting paragraph 6.3.16. It states that as a general guide it should be "not more than +[sic]10% of the existing site". It goes on to recognise that each application would have to be judged on its individual merits bearing in mind the variable circumstances that would need to be taken into account. I agree with an objector that providing a guide figure is not helpful and I note that, in relation to an increase in the number of units, NA 216 does not seek to stipulate such a guide. Given that any physical expansion would only be acceptable if it was justified by demonstrable benefits, the size of any extension as a proportion of the existing site would not be a crucial consideration.

8. As any extension, however small, which was deemed 'harmful' would be contrary to the Policy I find no basis for the Council's concern that the Policy could lead to a significant increase in the land area of such sites which would harm the area's character and amenity. There may, for instance, be circumstances where a larger extension is required in order to maximise the potential landscape benefit, whilst there may be other cases where, especially on large sites, the acceptable

extension may be significantly less than the stipulated figure. The Council has suggested Further Proposed Change NAP 13 which explains the percentage limit. I am satisfied that the deletion of this guide figure will not compromise the environmental protection that the Council seeks, especially as the Council can control the use of the extended area through the imposition of planning conditions.

9. Whilst NAP 13 proposes to delete the reference to “one-off” in both the Policy and in supporting paragraph 6.3.16, it fails to delete the reference to the term in the preceding paragraph, 6.3.15 – the whole sentence therein which reads “Consequently, this policy .... not cumulative extensions.” should be omitted in accordance with an amended version of the Council’s Proof of Evidence 42.

*Increasing the number of static holiday caravan units on existing sites*

10. As mentioned in the introduction above, the Pre-inquiry Proposed Change version of the Plan introduces the concept that an increase in the number of static holiday caravan units may be acceptable in certain circumstances. This change is in response to objections and I concur that it enables applications which would provide sufficient economic and/or environmental benefits to proceed as an exception to the Plan’s generally restrictive stance on such proposals. As drafted NA 216 does not define what constitutes a “minor” extension in the number of units. Whether it was intended to be covered by the 10% general guide for site expansion is not clear. However, my attention has been drawn specifically to 2 paragraphs in the aforementioned UDP Inspector’s report, in which the Inspector opines that to “provide the desired flexibility for site operators but also to minimise uncertainty” a maximum increase of 10% above the number at the time of the first application for any increase would be appropriate during the Plan period. Unlike the situation with regard to the physical expansion of a site, I consider that such a limit would provide useful guidance for Plan users and would be consistent with the Plan’s generally restrictive approach to the provision of additional units. I also agree that to avoid being too prescriptive this figure should appear within the supporting text rather than the Policy. An objector suggests that, instead of a percentage limitation, an additional criterion should be introduced against which to assess the acceptability of a minor increase in the number of caravan units. Such a criterion is not necessary given that it addresses matters already covered within the Policy’s criteria and other Plan policies.

*Exchange schemes to allow the replacement of touring pitches with static holiday caravan units*

11. The Council does not specifically address this issue in its Proofs of Evidence although it provides some comment in relation to Policy D15. For reasons I detail in relation to the third main issue of my report on that Policy, I agree with objectors that there will be circumstances where the benefits derived justify changing touring pitches to static holiday caravan units. The justification for such an exchange would not be materially different to that which would allow an increase in the number of units which I deal with in considering the preceding main issue. In the interests of clarity the Policy should state that it deals with such exchanges and, to follow from the reasoning set out in the Introduction above, reference to this could be added to a new point c. at the outset of the Policy. This would ensure that such exchanges were accepted only where suitable improvements would be forthcoming.

*Landscape impact from views within the National Park*

12. The Council has generally resisted requests that topic-specific policies should include a reference to the need to protect the views of the landscape from within the National Park. I have agreed with this stance given that a new policy introduced by NA 99 covers this matter. However, as that new policy addresses the impact of new development it does not fully address the potential implications raised by this Policy, which also requires an assessment of the impact of an *existing* holiday park as a benchmark against which to evaluate a proposed scheme. On this basis I agree that a specific reference to this consideration, as is proposed by NA 216, is appropriate.

## RECOMMENDATIONS

I recommend:

**(REC.0556) that the DD be modified by the acceptance of NA 216 as further amended by the following:**

- the addition, as bullet point c., to the list of proposals identified by the Policy – “a minor increase in the number of static caravan units or proposals to exchange touring pitches for static caravan units” and to move the “or” that appears at the end of point a. to the end of point b.;
- the insertion within criterion 2. of a requirement that any increase in the number of static holiday caravan units is minor and is commensurate with the scale of any improvements to the site;
- the deletion of the part of a sentence beginning with “in limited circumstances” and ending with “improvements to the site”;
- the deletion of the reference in the supporting text to “curtilage”;
- the deletion of the references to “one-off” that appear in the Policy and both supporting paragraphs;
- the deletion of the first sentence, as it appears in the DD, of paragraph 6.3.16 “As a general guide ..... no more than +10% of the existing land area/curtilage of the site”;
- the deletion of the final sentence proposed by NA 216 (“ ‘Minor’ in this .... environmental improvements”) and the insertion in paragraph 6.3.16 of an explanation that the term “minor” in relation to extending site area is not defined but that in relation to an increase in the number of units it should be no greater than a 10% increase over the number at the time of the first application to increase the number of units;

**(REC.0557) that no other modification be made to the DD in response to these objections and, in particular, that NAP 13 be not accepted.**

**POLICY D17 – STATIC CARAVAN AND HOLIDAY CHALET SITES – EXTENDING THE SEASON**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA217

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/961/6	British Holiday & Home Parks Assoc. Ltd, Gwynedd & Mon Branch	Charles F Jones & Son	25

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/180	Welsh Assembly Government		82

**Note**

- It is evident that NA 217 was introduced to address an objection to the Welsh version of the DD. On this basis, and given that the English version of the proposed change is not based on an accurate representation of the DD, I have limited my consideration of NA 217 to the Welsh version.

**Main Issues**

- Extending the holiday occupation of the units to 12 months a year.
- Whether, in the Welsh version, “aros” is a more suitable term than “byw”.

**Inspector’s Considerations and Conclusions**

*Extending the holiday occupation of the units to 12 months a year*

1. The Policy seeks to permit the occupation of static caravans and holiday chalets for 10½ months a year, effectively extending the period beyond that which has been permitted in the past. The objector contends that the period should be extended to a full 12 months a year, explaining that this would meet the demands of holiday makers and would lead to improvements in the quality of the units.

2. The critical question raised herein is whether a holiday occupancy condition is sufficient to ensure that the units are not occupied as a permanent residence, or whether a period of non-occupation is the most suitable means of meeting this objective. I note that paragraph 6.3.18 of the Plan indicates that the Council would impose a holiday occupation condition on any permission granted to extend

the period of occupancy permitted by the Policy. The Council has suggested in its Proof of Evidence 25 that its stance aligns with TAN13: Tourism, citing the absence of an objection from Welsh Assembly Government in support of its position. On the basis of the advice set out in paragraph 15 of the TAN, I disagree with the Council's stance. The TAN informs that a "holiday occupancy condition would seem more appropriate than a seasonal occupancy condition where the need is to reduce pressure on local services". It goes on to advise that seasonal occupancy conditions should continue to be used where the nature of the structure makes it unsuitable for continuous occupation in winter months, or where there are local environmental protection considerations, such as proximity to a wildlife habitat, that arise. Such considerations have not been raised in this case. It is a prerequisite of the Policy that the unit is suitable for winter habitation and there are other policies that would safeguard wildlife habitats.

3. There is no reason to believe that the enforceability considerations raised by the Council differ from that which applies nationwide and thus there is no justification for departing from national policy. The Policy should therefore be amended to allow year-round occupation.

*Whether, in the Welsh version, "aros" is a more suitable term than "byw"*

4. The Welsh Deposit Draft version uses the Welsh term for 'live' or 'reside' rather than 'stay'. This would give the wrong impression that the units could be occupied as a main residence. This is corrected by NA 217.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0558) that the DD be modified by the acceptance of NA 217, but only insofar as it relates to the Welsh version, as further amended by the deletion of "a period of ten and a half months" and replacement with "year-round occupation" in the English and Welsh versions of the Policy and supporting paragraph;**

**(REC.0559) that no other modification be made to the DD in response to these objections.**

**POLICY D18 – NEW SITES FOR TOURING CARAVANS, CAMPING AND TOURING UNITS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA218

This Section is subject to Further Proposed Changes Nos: NAP90

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/65</b>	<b>Sustainable Gwynedd Gynladwy</b>		<b>17</b>
<b>B/954/11</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley, Nathaniel Lichfield &amp; Partners</b>	<b>342</b>
<b>B/961/7</b>	<b>British Holiday &amp; Home Parks Assoc. Ltd, Gwynedd &amp; Mon Branch</b>	<b>Charles F Jones &amp; Son</b>	<b>26</b>

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/954/2015</b>	<b>Bourne Leisure Ltd</b>	<b>Margaret Baddeley (Nathaniel Lichfield &amp; Partners)</b>	<b>342</b>

**Notes**

- On the basis of the objector's submissions I have treated B/961/7 as conditionally withdrawn. I have also noted that objections B/954/11 and /2015 are described by the objector as conditionally withdrawn although I am mindful that this is on the basis of the Further Proposed Change which the Council proposes rather than the Pre-inquiry Proposed Change.
- I have assumed that the insertion of the phrase "Extending the season" that appears in the title of Policy D18 in the Pre-inquiry Proposed Change document is in error. Likewise the omission of the alterations to the Policy proposed by NA 218 in the Further Proposed Change version – it seems to me that the Council's intention is that both NA 218 and NAP 90 should be incorporated into the Plan.

**Main Issues**

- Whether the Policy's wording is too negative.

- The requirement of a 'proven lack of facilities'.
- Whether the reference to an 'unobtrusive location' is necessary.
- Whether criterion 4 is unduly restrictive.
- The ecological footprint of touring caravans.

## **Inspector's Considerations and Conclusions**

### *Whether the Policy's wording is too negative*

1. In response to an objection, the Council proposes a Further Proposed Change, NAP 90, to the wording of the opening sentence of the Policy which would replace "will be refused unless" with "will be permitted provided". I consider that the more positive tone of the proposed wording is appropriate, although it will be necessary to carefully consider any representations received when this change is subjected to public scrutiny through the proposed modifications process.

### *The requirement of a 'proven lack of facilities'*

2. Based on the explanation of the Policy set out in paragraph 6.3.19 of the Plan, and the representations that I have received, I cannot identify a justification for the requirement that proposals will be permitted only if there is a proven lack of such facilities within a locality. In its Proof of Evidence 26 the Council explains that this requirement is necessary because of an over-provision of this type of accommodation in parts of the Plan area, although no evidence to support this contention has been provided nor are the areas in question identified. It seems to me that addressing over-provision is a different concern to proving a lack of facilities. A situation where demand for such facilities outstrips supply is indicative of a lack of facilities and would meet the Policy's test, even though to increase supply may lead to planning-related problems associated with an over-concentration within the locality.

3. Criterion 4 seeks to ensure that any scheme that would lead to problems associated with over-concentration can be resisted, whilst the remaining criteria seek to ensure that the site specific impact of a scheme is acceptable. These provide the necessary controls on new sites, including those within areas that the Council deems to have a high concentration of such facilities - proving need is an unjustifiable requirement which ought to be deleted. It follows that the elaboration of need set out in NA 218 is not necessary.

### *Whether the reference to an unobtrusive location is necessary*

4. The term "unobtrusive location" is included within criterion 1 which deals with the appearance of a proposal. The reason for the objection to this phrase is not clear. It seems to me to be a reasonable requirement which is consistent with the Policy's aim of protecting the character and appearance of the area.

### *Whether criterion 4 is unduly restrictive*

5. Objection is raised to this criterion on the grounds that it is too restrictive and fails to take into account the type and range of existing and proposed facilities within a locality. I disagree. It is an important criterion that requires an assessment of the cumulative impact so that it may be determined whether a locality has sufficient capacity to accommodate the envisaged development. To

undertake such an assessment, the nature of the existing and proposed provision would have to be taken into account – bearing this in mind it seems to me that the introduction of the word “character” to the criterion as proposed by NA 218 is unnecessary and only makes its meaning less clear. It should not be incorporated into the Plan.

*The ecological footprint of touring caravans*

6. The Council accepts the objector’s contention that the ecological footprint of a touring caravan far exceeds that of a touring car, but does not agree that it is justifiable or reasonable to restrict the development of new touring unit sites only to those on bicycle, train or bus routes. As the matter of accessibility to nodes of transport other than the car is specifically addressed by Policy CH30 ‘Increasing Accessibility by Public Transport’, I consider that it is not necessary to specifically address this matter as part of this Policy.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0560) that the DD be modified by deleting “refused unless it can be proven that there is a lack of facilities within the locality in question and”, and replacing it with “permitted”;**

**(REC.0561) that no other modification be made to the DD in response to these objections and, in particular, that NA 218 and NAP 90 be not accepted.**



**POLICY D19 – TOURING CARAVAN, CAMPING AND TOURING UNIT SITES – EXTENSIONS, ADDITIONAL PITCHES, RELOCATION AND EXCHANGES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/961/8	British Holiday & Home Parks Assoc. Ltd, Gwynedd & Mon Branch	Charles F Jones & Son	27

**Main Issues**

- The removal of touring units when not in use.
- The requirement to limit any expansion.

**Inspector's Considerations and Conclusions**

*The removal of touring units when not in use*

1. An objector considers that the requirement that touring units are removed from the site during periods when not in use is an unreasonable imposition on the operation of such sites. On the basis that the site has been considered suitable for use as a touring caravan site there is no justification for such a restriction. On-site storage enables visitors to return to a favourite site without having to tow their touring caravans away between visits and also avoids the need to find other storage facilities. In response the Council is concerned that allowing the storage of the units would give the pitches a semi-permanent character that would be similar to static caravan sites and so be harmful to the appearance of the countryside. It is also argued that this would lead to an overall reduction in the supply of pitches available for occupation, leading to an increase in pressure for new sites. I have taken into account the extract of the Inspector's Report on the Eryri Local Plan referred to by the objector and the comments thereon by the Council.

2. The visual impact of a touring caravan on a pitch approved in conformity with the requirements of D19 would not be made unacceptable by its use for storage as opposed to holiday occupation. Indeed one could reasonably expect that, in most cases, it would be less conspicuous given the likely absence of the manifestations of occupation, such as awnings, play equipment and parked car.

3. I now turn to the concern regarding the supply of touring pitches. Whether pitches are made available for storage or for occupation is essentially a decision for site operators in response to the market. Whilst the use of pitches for storage may prevent their occupation by visitors seeking to occupy the pitch, it does not follow that this would lead to an unacceptable expansion in the provision of pitches.

Policies D18 and D19 provide adequate safeguards to prevent harmful new or expanded touring sites. Furthermore, it might be expected that in areas of highest demand for pitches that the cost of occupation of pitches would generally deter long periods of storage use. In such cases touring unit owners would be encouraged to use dedicated storage areas, possibly within existing sites, in accordance with Policy D20 as amended by my recommendation. I also agree with the Local Plan Inspector that difficulties would arise in enforcing the prohibition of storage use of pitches, particularly given that the period of such use could be only a few days, for instance between regular return visits for long weekends.

4. Where the use of a site is deemed to be acceptable on a seasonal basis only, such as where the absence of screening in winter months would unacceptably increase visual impact, a condition to secure seasonal use would restrict the storage as well as occupation of the touring caravans. This addresses the Council's concern regarding the potential semi-permanent use of sites. Thus, requirement 2. of the Policy should be omitted.

*The requirement to limit any expansion*

5. The Policy permits a "limited increase" in the number of touring unit pitches and "minor extensions" to the sites. Supporting paragraph 6.3.22 quantifies what is meant by these phrases and explains that they are intended to serve as a "general guide". This blanket restrictive approach to all but modest expansion schemes does not sit comfortably with D18, as amended by NAP 90 and as further amended by my recommendation. As it is permissive of the creation of new touring unit sites, provided certain criteria are met, there seems to me to be no reason for indiscriminately limiting the growth of all existing sites. The acceptability of any scheme should be assessed against the particular circumstances of the site and surrounding area. In some cases only small-scale expansion would be acceptable whereas in other cases larger extensions may be appropriate, especially if accompanied by improvements of a proportionate scale.

6. In its Proof of Evidence the Council has drawn parallels between the Plan's approach to the proposed expansion in numbers/site area of touring caravans and static caravan sites. However, in the case of static caravans the Council has established that there is an adequate supply of such accommodation within the Plan area, and that as a matter of policy it does not seek to increase the provision unless justified by specific benefits. No such evidence has been provided in the case of touring units. Point 1. of this Policy provides sufficient safeguards in terms of cumulative impact by requiring that any proposed expansion in touring unit provision does not exceed the ability of a locality to accommodate the development.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0562) that the DD be modified by the deletion of requirement 2. and by incorporating point 1. within the preceding paragraph;**

**(REC.0563) that the DD be modified by the deletion of the references to "limited" and "minor", and the substitution of "an" for "a" in point a. of the Policy;**

**(REC.0564) that the DD be modified by the deletion of the sentence from paragraph 6.3.22 that begins "As a general guide ....." and ending "of the site";**

**(REC.0565) that no other modification be made to the DD in response to these objections.**

## POLICY D20 – STORING TOURING CARAVANS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA219

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/971/1	The Caravan Club	Caroline Shipperlee, Hepher Dixon	388

### Main Issue

- Caravan storage within touring caravan sites.

### Inspector's Considerations and Conclusions

1. An objector contends that there is no reason for excluding touring caravan sites from being used as storage areas rather than on separate sites, given that the joint use would limit the environmental and visual intrusion on an area. Based on recent experience, the Council argues that storage facilities should be off-site rather than within touring caravan sites because of unacceptable visual impact that such on-site storage practises have had on the countryside, especially during the winter months. It also points out that storage adjacent to touring sites would be within the scope of the Policy.

2. The use of touring *pitches* approved under the terms of Policy D19 for the storage of touring units is dealt with in my assessment of that Policy. This Policy, in effect, deals with proposals for dedicated storage facilities. I am mindful of the Council's concern that storage activities should not create an unacceptable visual impact within touring caravan sites. However, as it is a requirement of the Policy that any site to be used for such storage is unobtrusive, there is no justification for singling out existing touring sites as falling outside the Policy's permissive provisions. Each prospective storage site that comes forward would be judged on its individual planning merits regardless of the fact that it may be a touring caravan site. Consideration would need to be given to permitting only a part of a site to be used if other parts are deemed visually intrusive. Likewise it may be reasonable to allow storage for only a certain period in the year when the site is in use as a touring caravan site and the screening quality of vegetation is at its most effective. NA 219 does not alter the effect of the Policy but merely improves the clarity of expression. Criterion 3 of NA 219, which effectively repeats criterion 1 of the Deposit Draft, is unnecessarily restrictive and should be omitted.

3. Criterion 2 of NA 219 requires that unobtrusive locations will be acceptable where there are no suitable buildings available. However, this criterion begins with "in exceptional circumstances". This introduces ambiguity to the criterion: it could mean the 'circumstances' set out within the criterion and as such the phrase is unnecessary, or it could mean some other, un-revealed circumstances and as such

it lacks precision. I assume that the intended meaning is the former, and on this basis the reference to exceptional circumstances should be deleted. Clarity would be improved by other changes to the criterion as detailed below.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0566) that the DD be modified by the acceptance of NA 219 as further amended by:**

- **the deletion of criterion 2. and its replacement with “where there are no appropriate existing buildings available that unobtrusive outdoor locations are utilised,”**
- **the deletion of criterion 3. in its entirety and the renumbering of criterion 4. accordingly.**

**(REC.0567) that no other modification be made to the DD in response to this objection.**

## 6.4 INTRODUCTION -RETAILING

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA220

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/182	Welsh Assembly Government		80

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2218	Welsh Assembly Government		80

### Main Issues

- Whether the introduction to the retail section should refer to Policy B22.
- Whether the term sequential approach should be used instead of sequential aspect.

### Inspector's Considerations and Conclusions

*Whether the introduction to the retail section should refer to Policy B22*

1. In response to an objection the Council has introduced NA 220 which adds a reference to Policy B22, which deals with local amenity matters such as living conditions and appearance, to the list of key policy considerations that apply to the shopping policies D26 and D27. I agree that this is an appropriate addition.

*Whether the term 'sequential approach' should be used instead of 'sequential aspect'*

2. The Council explains that the reference to sequential 'aspect' was the result of an error in translation of the Pre-inquiry Proposed Change version of the Plan. It ought to read sequential "approach". This should be addressed as part of the proposed modifications to the Plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0568) that the DD be modified by the acceptance of NA 220, but that the reference to sequential 'aspect' should be replaced with sequential 'approach';**

**(REC.0569) that no other modification be made to the DD in response to these objections.**

## POLICY D21 – NEW DEVELOPMENT WITHIN DEFINED TOWN CENTRES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA221; NA222

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/11	Tesco Stores Ltd	Paul Lester (DPP)	601
B/973/1	W.M. Morrison Supermarkets Plc	Peacock & Smith	601

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/183	Welsh Assembly Government		601

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/181	Welsh Assembly Government		

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/870/66	Sustainable Gwynedd Gynladwy		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/2017	Tesco Stores Ltd		601

### Main Issues

- Reference to planning obligations.
- The requirement for a retail impact assessment.
- An acceptable balance of retail and non-retail uses.
- Whether a town centre's "attractiveness" is a suitable criterion.



## Inspector's Considerations and Conclusions

### *Reference to planning obligations*

1. In response to an objection to the DD the Council has introduced a Pre-inquiry Proposed Change to the Policy, NA 221, which informs that planning obligations or planning conditions will be used to require that operations or activities are carried out or that payments are made. A counter objection has been lodged on the basis that the wording, particularly that "the Local Planning Authority will enter into a planning obligation", is not consistent with WO Circular 13/97: Planning Obligations. The approach is also considered to be inconsistent with that set out in paragraph 6.4.16 (it is evident that the objector is referring to the Pre-inquiry Proposed Change version of that paragraph which provides supporting text to Policy D26).

2. The Council contends that as WAG has conditionally withdrawn its objection it appears to consider the Pre-inquiry Proposed Change to be acceptable. Nevertheless, I note that its objection referred to the supporting paragraph not the Policy. It seems to me that the reference to planning obligations and conditions set out in NA 221 introduces an unnecessary degree of detail to the Policy. These mechanisms are essentially administrative arrangements that are used to secure the aims of the Policy and are matters best addressed within the supporting text; in my view, NA 226 provides a form of wording that would adequately set out the Council's position in this respect and should be included in the supporting text to D21. Contrary to the objector's view I find that it is not necessary to set out the tests of the Circular in the Plan.

3. In the interests of consistency the Council may wish to check the whole Plan with the intention of ensuring that references to the use of planning obligations and conditions appear in the supporting text rather than the main body of policies. Policy D26 is one obvious example where such an amendment is required.

### *The requirement for a retail impact assessment*

4. In the Deposit Draft version, supporting paragraph 6.4.2 includes a provision that, in circumstances where a development could have an impact on the attractiveness, viability or vitality of a centre, the developer will be requested to submit a Retail Impact Assessment. The paragraph goes on to explain that the defined centres are important for reasons other than shopping. In response, the objector contends that within town centres developers should not be required to provide a retail impact assessment, given that the principle of such development accords with national policy. In its Proof of Evidence 601 the Council contends that the Plan's requirement is consistent with MIPPS 02/2005: Planning for Retailing and Town Centres and TAN4: Retailing and Town Centres and ought to be retained as a means of ensuring that new retail development supports communities and existing centres. However, the Proof fails to take into account that NA 222 omits the DD reference to a retail impact assessment in its entirety. As this text is not shown as being struck out it is not clear whether its omission from Pre-inquiry Proposed Change is intentional. In any event, I have taken into account both versions of the Plan.

5. Paragraph 6 of TAN4 stipulates that all applications for retail developments over 2,500m<sup>2</sup> gross floor space should be supported by an impact assessment, but as the Council rightly points out in its Proof, the TAN also provides that such assessments may also be necessary for some smaller developments. On the basis of this Proof it appears that the Council views the ability to require such an assessment in appropriate circumstances as an important tool in protecting the attractiveness, viability and vitality of town centres. Whilst paragraph 10.3.2 of the MIPPS makes it clear that development proposals for “uses best located in centres” are not required to establish a ‘need’ on sites in town centres, it does not follow that retail schemes should not be required to submit a retail impact assessment in certain circumstances. I consider that paragraph 6.4.2 ought to include a reference to retail impact assessments but in a form of words that more closely follows that in paragraph 6 of the TAN, such that it requires assessments for schemes less than the stipulated threshold only where a scheme is likely to have a “large impact on a smaller town or district centre”.

6. To improve clarity an additional sentence should be included to explain that within town centres planning applications for retail, leisure and other uses best located in a town centre will not be required to demonstrate a need for the development.

*An acceptable balance of retail and non-retail uses*

7. As the implications of non-retail developments on town centres are dealt with in Policies D22 and D23, the reference to this matter in NA 222 is superfluous. I do not concur with the Council that this addition provides improved guidance on the acceptable balance of retail and non-retail uses.

8. Incidentally, NA 222 does not include a sentence that appears in the Deposit Draft version which explains that the extent of each town centres is shown in the Plan. As this sentence is not shown as to be struck out it is not clear to me whether its omission is intentional. In any event I consider this sentence should be retained but in a revised form to make it clear that the town centre boundaries are shown on the inset maps.

*Whether a town centre's “attractiveness” is a suitable criterion*

9. An objector considers that the term “attractiveness” should not be used because of difficulties in defining and quantifying such an attribute. However, the term is recognised in national policy, both in the MIPPS and the TAN, and appears alongside vitality and viability as indicators of the ‘health’ of town centres. Paragraph 5 of the TAN identifies information of value in assessing town centres against these 3 features, which include turnover in relation to floorspace, shopping rents, retailer representation and change, etc. It is a term that should be retained.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0570) that the DD be modified by the insertion of an additional supporting paragraph to address the use of planning obligations and conditions, using the same wording as NA 226;**

**(REC.0571) that the DD be modified by rewording the third sentence following the table in paragraph 6.4.2 which begins “The Plan shows .....”. The revised wording should make it clear that the Plan’s Inset Maps show the physical extent of the town centres;**

**(REC.0572) that the DD be modified by rewording the fourth sentence following the table in paragraph 6.4.2 which begins “In the circumstances where .....”. The revised wording should more closely reflect that set out in paragraph 6 of TAN4. Immediately after this sentence an additional sentence should be inserted to explain that that within town centres planning applications for retail development will not be required to give consideration to the need for the development;**

**(REC.0573) that no other modification be made to the DD in response to these objections and, in particular, that NA 221 and 222 be not accepted.**

## POLICY D24 – HOT FOOD TAKE-AWAY DEVELOPMENTS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/67	Sustainable Gwynedd Gynaladwy		

## **POLICY D25 – SHOPS IN RESIDENTIAL AREAS WITHIN DEVELOPMENT BOUNDARIES OF CENTRES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA223

This Section is subject to Further Proposed Changes Nos: NAP56

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/68</b>	<b>Sustainable Gwynedd Gynladwy</b>		<b>18</b>

### **Note**

- The opening sentence of the English version of the Policy does not contain the reference to being within the Development Boundaries of centres which appears in the Welsh equivalent and the title to the Policy. Such an omission alters the spatial scope of the Policy and thus ought to be addressed.

### **Main Issue**

- Whether it is reasonable to require that a local shop is not needed and is not viable as prerequisites to allowing its change of use.

### **Inspector's Considerations and Conclusions**

1. The objector contends that it is not logical that prior to permitting a change of use of a local shop it must be demonstrated that the shop is no longer needed and that it is also not viable. Meeting one or other of these tests is sufficient evidence that shop has no future. In its Proof of Evidence 18 the Council responds by emphasising the important role that local shops can play in serving local communities and opines that the Policy is consistent with MIPPS 02/2005: Planning for Retailing and Town Centres.

2. There is no dispute that local shops can fulfil a useful role - the matter in contention is the extent to which the Policy should seek to protect such facilities. NA 223 as further amended by NAP 56 seems to address the objector's concern by introducing a more pragmatic approach, permitting the loss of local shops if there is adequate alternative provision in existence or that reasonable attempts to market the property have proved unsuccessful. This revised approach is reasonable. I am mindful that NAP 56 has not been the subject of public consultation. However, I have incorporated this change into my recommendation given the minor amendments that it contains. Nevertheless, it will be necessary for the Council to carefully consider any responses received to this change when it is subjected to public scrutiny at the proposed modifications stage. I have

assumed that the phrase "for a price or reasonable rent" introduced by NA 223 and perpetuated in NAP 56 contains an error - 'reasonable' has been misplaced and ought to appear in front of price so that it qualifies both selling price and rent. The supporting text refers to "reasonable price or rent". NAP 56 fails to indicate the deletion of text rendered superfluous by its change. I have included a reference to this in my recommendation.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0574) that the DD be modified by the acceptance of NA 223 as amended by NAP 56 and as further amended by the deletion of "on the" from the fourth line of point 1. of the NAP 56 version of the Policy and on the same line to delete "for a price or reasonable rent" and replace it with "for a reasonable selling price or rent";**

**(REC.0575) that no other modification be made to the DD in response to this objection.**

**POLICY D26 – SUPERSTORES/RETAIL WAREHOUSES OUTSIDE DEFINED TOWN CENTRES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA224; NA225; NA226

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/875/3	RPS Planning		580
B/923/12	Tesco Stores Ltd	Paul Lester (DPP)	580
B/973/3	W.M. Morrison Supermarkets Ltd	Peacock and Smith	580
B/991/3	Finneys	Jan Tyrer	585

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/185	Welsh Assembly Government		580
B/734/186	Welsh Assembly Government		580
B/734/184	Welsh Assembly Government		580
B/776/19	Environment Agency Wales		580
B/322/4	Morbaine Ltd		580

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/2018	Tesco Stores Ltd		580

**Notes**

- In addition to the above representations I also deal with objection B/1005/13 herein.
- Objection B/973/3 is dealt with in the section of my report on Policy D21.

- Although objection B/875/3 refers to Policy D25, I agree with the Council that this is a typographical error which should read D26. I dealt with the representation on this basis.
- In its Proof of Evidence 585 the Council appears to suggest that objection B/991/3 is site specific and is not relevant to this Policy. It is clear to me that the objection has direct implications to the Policy and I have dealt with it accordingly. Given my findings in this respect it is not necessary to deal with B/991/1 separately.
- For the reasons given in the sub-section of my report on Policy D27, I consider that that Policy should be deleted and elements of its provisions amalgamated within this Policy as explained in Recommendations (REC.0573 and REC.0574) below.
- The merits of retail development of land at Caernarfon Road Retail Park, Bangor and at Penamser Industrial Estate, Porthmadog are dealt with in the site-specific sections of this chapter.

### **Main Issues**

- The need to limit retail developments outside town centres to bulky comparison goods retailing only.
- Whether “practical” is an appropriate expression.
- Whether the supporting text ought to stipulate a reasonable period for the purposes of assessing likely future availability.
- Whether the Policy should include a criterion addressing refuse collection and recycling.
- Are there inconsistencies between the English and Welsh versions.
- Whether the supporting text should acknowledge the context set by Policies C2 and SP18.
- Whether the reference to planning obligations should be altered.
- Whether the Policy should seek to identify suitable sites.

### **Inspector’s Considerations and Conclusions**

#### *Introduction*

1. Before dealing with the main issues raised by objectors it is necessary for me to clarify the precise spatial scope of this Policy, which is not clear following the significant changes to the Policy introduced by NA 224. The opening sentence of the DD and the Pre-inquiry Proposed Change versions of the Policy explain that it relates to sites “outside the defined town centres” of 4 named settlements, these comprise the sub-regional centre and 3 of the 4 urban centres – no explanation is provided for the omission of Blaenau Ffestiniog. Criterion 2 requires sites to be “within the Development Boundary”. Thus far it seems that the Policy is intended to deal only with proposals within the Development Boundaries of the 4 identified settlements, but this is not clear. However, NA 225 refers to the promotion and protection of “service centres”, which is a term that encompasses 8 local centres as well as the aforementioned centres. If the intention of this Policy is to only address development within the Development Boundaries of the 4 named centres there is a void created in terms of other service centres, given that D29 deals only with shops in villages, which are lower down the settlement hierarchy than service centres. It may be the case that the justification for limiting the scope of the Policy to the 4 identified settlements was based on the original purpose of the Policy – to direct superstore and warehouse developments selling bulky comparison goods to



those settlements highest in the service centre hierarchy. Since the scope of the Policy has been considerably broadened by subsequent changes it appears that the amended Policy should include all service centres.

*The need to limit retail developments outside town centres to bulky comparison goods retailing only*

2. An objector considers that the scope of the Policy should be broadened by deleting the reference to bulky comparison goods. This would allow extensions to existing non-bulky retail units outside the town centres, specifically Caernarfon Road in Bangor and would allow new non-bulky goods retail outlets to be assessed against the Policy's criteria. Another objector emphasises the significant contribution that out-of-centre development can make to an area. The Council proposes NA 224 to meet these objections. It seems to me that the proposed change addressed a policy vacuum that existed in the Deposit Draft version in terms of retailing of non-bulky, non-food goods outside town centres. However, I consider that the Plan should continue to distinguish between bulky and non-bulky goods retailing. Paragraph 10.3.12 of MIPPS 02/2005: Planning for Retailing and Town Centres recognises that stores selling bulky goods may not be able to find suitable sites in town centres because of their nature and particular requirements. This can be a significant consideration in terms of applying the sequential test which may justify the provision of a bulky goods retailing outlet further from the town centre than would otherwise be the case. Acknowledging this within the supporting text of the Policy would be helpful in my view.

*Whether "practical" is an appropriate expression*

3. The Council has responded to this objection by replacing "practical" with "suitable" in NA 224. I agree with this change but consider that a further change should follow – as the word 'suitable' encompasses viability considerations, the phrase "or viable" is unnecessary and should be deleted. Clarity of meaning could be improved by deleting "there is no suitable" and replacing it with "there is not a more suitable". The introduction of the word "alternative" which is also included in NA 224 is a necessary amendment.

*Whether the supporting text ought to stipulate a reasonable period for the purposes of assessing likely future availability*

4. The objector considers that the supporting text should provide a timescale indication of the phrase "or likely to become available" which appears in parentheses in criterion 2. I agree given that, otherwise, this phrase could be used to prevent a proposed development on the basis that an alternative site is likely to become available at some, undetermined, time in the future. To avoid such a situation a guide as to a reasonable timescale for that site becoming available should be included; I concur with the objector's suggestion of 5 years.

*Whether the Policy should include a criterion addressing refuse collection and recycling*

5. In response to an objection, NA 224 introduces an additional criterion that requires the provision of suitable refuse collection and recycling facilities. Given the particular relevance of such matters to retail developments of the nature envisaged by the Policy, I concur that this criterion ought to be included.

*Are there inconsistencies between the English and Welsh versions*

6. The Welsh and English versions of the Deposit Draft document are inconsistent in that the former includes footnote reference numbers but no corresponding footnotes, whereas the other contains no such references. The Council explains that it has decided to rely on a list of terms at the end of the Plan (NA 230) instead of footnotes that follow individual policies to explain important terms. Whilst NA 224 has deleted one footnote reference number from the Welsh version, another remains (2) and should be removed.

*Whether the supporting text should acknowledge the context set by Policies C2 and SP18*

7. NA 225 introduces additional text to supporting paragraph 6.4.13. This provides an explanation of the context to the Policy's approach by introducing matters covered by Policies C2 and SP18.

8. Whilst this information is likely to prove a helpful additional to Plan users it does highlight the importance of the relationship between C2 and D26, and for that matter, other retailing policies. C2 adopts a broad approach to the sequential test whereas retailing policies refine this by, for instance, introducing a 'need' test for developments outside town centres. In the interests of clarity it seems to me that the explanatory text of C2 would benefit from an additional sentence to explain that the location of retail developments are dealt with in more detail within Section 6.4 of the Plan.

*Whether the reference to planning obligations should be altered*

9. For reasons that I detail in my consideration of the first main issue of the section of my report on Policy D21, I consider that reference to planning obligations and conditions is a matter that should be dealt with in the supporting text to policies rather than within the Policy itself. Thus I consider that the final sentence of the Policy should be omitted; the detail set out in NA 226, as an addition to supporting paragraph 6.4.16, is sufficient to deal with this matter.

*Whether the Policy should seek to identify suitable sites*

10. An objector argues that, in the case of Bangor, there is insufficient suitable land available within the Development Boundary to meet the demand for additional comparison goods retailing over the Plan period. To maintain its position as Regional Centre, future expansion should be accommodated through the allocation of an identified parcel of land which the objector contends is the most suitable site for the purpose. The Inset Plan for Bangor should be amended to show the designation, and criterion 2. of the Policy should be amended to recognise its potential as an exception to the requirement that such development is confined within Development Boundaries. Another objector argues that, as the site of the Porthmadog Sub TEC within the Penamser Industrial Estate complies with the Policy's criteria, it should be allocated as a site for a superstore/retail warehouse.

11. In response the Council maintains that a criteria-based policy is adequate to deal with out-of-centre retail developments. It suggests that the Policy would enable the sites in question to be assessed against its criteria, including a need for

the development and the existence of any sequentially preferable sites. As an aside, it opines that the Bangor site performs poorly in terms of the sequential test, further extending retail development along Caernarfon Road which has already reached a considerable distance from the centre. Furthermore, it argues that the site would breach the physical boundary to the west of the city provided by the A55 expressway and would be harmful to the open countryside. The Council's assertion that this site could be assessed against the Policy's criteria is not wholly correct. As it lies outside the defined Development Boundaries it is outside the scope of the Policy (criterion 2.).

12. There is no dispute that Bangor has experienced significant retail development in recent years and I note the objector's evidence regarding the strengthening retail performance of the city in terms of national ranking. The Council does not comment on the merits of the Porthmadog site. There is no robust evidence before me of a need for further out-of-centre retail development in either case. In such circumstances, and mindful of the guidance contained in MIPPS, there is no requirement for the Plan to identify additional sites. This situation may well change within the Plan period - there will be an opportunity to revisit this matter either when the Plan is being reviewed or replaced.

13. As there is no requirement to allocate retail sites, it is not necessary to amend the DD in the manner suggested by the objectors. The Plan's allocation of employment land outside Development Boundaries does not alter my findings in this respect. However, the Bangor objection indirectly raises the question of whether it is reasonable to require retail developments that are suitable outside town centres to lie within Development Boundaries as well as having to meet the sequential test. Circumstances may arise in the future where a need for additional retail comparison floor space has been established (criterion 1.) and that the sequential test (criterion 2.) identifies a site outside the Development Boundaries as the most suitable. In such a situation it seems to me that the development of such a site should not be prohibited by the Policy. It would, of course, be required to meet the remaining criteria of D26, including good accessibility by public transport and does not lead to an unacceptable increase in the use of the private car, as well as other Plan policies. Therefore I consider that the reference to "Development Boundary" should be omitted from criterion 2. To clarify the spatial scope of the Policy I suggest that the opening sentence of the Policy should refer to "developments within or near service centres". In its Statement the objector suggests that the Policy should be amended such that it identifies the Caernarfon Road retail park as an exception to the sequential test requirement. I disagree; although I accept that further retail development within or near to the retail park may have advantages certain over other sites within the city, these would need to be considered in the assessment of suitable alternative sites as part of the sequential test.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0576) that the DD be modified by the acceptance of NA 224 as further amended by:**

- **the inclusion of a reference to convenience as well as comparison goods in the Policy's title, the opening sentence and criterion 1.;**

- the deletion of the references to the 4 named settlements and the amendment of the Policy as necessary so that it is clear that it applies to developments within or near every service centre but outside their defined town centres;
- the deletion of the footnote reference number in the Welsh version of criterion 1.;
- the deletion of criterion 2. and its replacement with a form of wording along the following lines: "that the sequential test shows that there is not a more suitable alternative site available or likely to become available";
- the deletion in its entirety of the final sentence of the Policy, which begins "When granting planning .....".

(REC.0577) that the DD be modified by the acceptance of NA 225 as further amended by:

- the inclusion within the supporting text of reference to the particular considerations arising from food store provision;
- an acknowledgement within the supporting text of the particular requirements that may arise in applying the sequential test to stores selling bulky goods and those requiring large showrooms;
- the inclusion of a reference within the supporting text to explain that, in applying the sequential test, sites that are likely to become available within a period of 5 years will be considered.

(REC.0578) that the DD be modified by the acceptance of NA 226.

(REC.0579) that no other modification be made to the DD in response to these objections.

**POLICY D27 – NEW FOOD SUPERMARKETS OR EXTENSIONS TO EXISTING ONES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA227

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/322/5	Morbaine Ltd		581
B/973/4	WM Morrison Supermarkets PLC	Peacock & Smith	581
B/923/13	Tesco Stores Ltd	Paul Lester (DPP)	581
B/955/1	Asda Stores Ltd	Nick Diment	581

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/767/9	Friends of the Earth (Mon & Gwynedd)		581
B/776/20	Environment Agency Wales		581

**Notes**

- Objection B/973/4 is dealt with in the section of my report on Policy D21
- Although not included in the above box heading the Council has proposed a Further Proposed Change, NAP 116, which appears in its schedule of such changes and in its Proof of Evidence 581. There are differences between the 2 versions, and neither is error-free. Nevertheless it is not necessary for me to deal with such matters given my Recommendation.
- Included in objection B/955/1 is a request that an up-to-date retail study is commissioned. It seems to me that this is a matter for the Council to consider when it begins work on reviewing or replacing the Plan.

**Main Issues**

- Whether the Policy should permit food retail developments outside town centres, subject to the sequential test, along the lines of Policy D26
- Whether the requirement to prove "need" for town centre developments should be omitted
- Whether the Policy should restrict supermarket development in order to sustain local businesses
- Whether the Policy should include a criterion addressing refuse collection and recycling

## Inspector's Considerations and Conclusions

*Whether the Policy should permit food retail developments outside town centres, subject to the sequential test, along the lines of Policy D26*

1. Objections are raised to the Policy's approach to the sequential test and one objector suggests that its approach should follow that of the preceding policy, D26. Having compared D26 as amended by Pre-inquiry Proposed Changes and D27, and mindful of the information presented in the Council's Proofs of Evidence, it is not clear to me why there are 2 separate policies, one dealing with food supermarkets the other with comparison goods. It seems to me that the decision to create 2 policies arose at the time that D26 was concerned with bulky goods and large retail units. The broadening of the scope of that Policy requires a re-think of the need to include both policies, especially as, for reasons I set out in my comments on D26, I see no reason for limiting that Policy to those settlements containing the main shopping centres. D27 applies to all settlements with town centres. I am mindful of the particular contribution of food shopping, together with post offices and pharmacies, to providing accessible and sustainable shopping centres as acknowledged in MIPPS 02/2005: Planning for Retailing and Town Centres. I have also noted that, according to the Council, a Retail Study suggests that existing provision means that there will be "very little demand for any further food supermarkets" [no timescale is indicated], and that it will therefore scrutinise any such proposals carefully. Such careful scrutiny could be exercised under the terms of D26 in much the same way as under D27. Furthermore, it is not clear to me why D27 deals only with food *supermarkets* – by doing so the Policy creates a void in terms of all other types of food retailing outside town centres, which is not wholly addressed by other policies. Given that the criteria set out in the Policy would be relevant to the assessment of most food store developments, not only supermarket schemes, I see no purpose in maintaining the distinction drawn by D27. Local shops are dealt with separately under D25 and would be unaffected by the broadening of the scope of this Policy.

2. In comparing D27 against D26 it seems to me to be essential to take into account D21 also. It deals with new retail development and extensions to existing retail units within defined centres, thus there seems to be no reason for D27 to concern itself with developments within town centres. The deletion of this element of the Policy would then make the remaining provisions align more closely with D26, further supporting the conclusion that they should be amalgamated. To do so would ensure a consistency of approach to out-of-centre retail developments whilst enabling the particular type of retail activity to be taken into account, for instance large-scale bulky goods retailing, food stores etc. It seems to me that, in its amended form, Policy D26 is the better constructed of the two policies, especially given the fundamental changes that would be required to D27 in light of the above comments. Thus I consider that D27 should be deleted and that D26 amended to deal with convenience as well as comparison goods. The use of the term 'convenience goods', which the Council uses in its Proof of Evidence 581, is more appropriate in this context than 'food stores' given that it covers a fuller range of goods bought on a routine basis and includes chemist's goods, newspapers, magazines etc. The supporting text should be altered to reflect this increase in scope of the Policy, and the list of terms at the end of the Plan should include a suitably worded definition in the same way as NA 230 deals with comparison goods.

*Whether the requirement to prove "need" for town centre developments should be omitted*

3. Given my findings in relation to the first issue it is not necessary to address this concern, although I note that the Council accepts the veracity of the objector's contention and has sought to remove the "need" requirement for town centre developments by introducing NAP 116. Need is not a requirement imposed by D21.

*Whether the Policy should restrict supermarket development in order to sustain local businesses*

4. The WAG's objectives for retailing and town centres are set out in MIPPS 02/2005 and includes competitive retail provision. As the Council points out national policy informs that it is not the role of the planning system to restrict competition between retailers within centres. The Council also points out that the Gwynedd and Ynys Môn Retail Study, 2002, shows a degree of capacity within town centres to absorb additional food shop provision.

*Whether the Policy should include a criterion addressing refuse collection and recycling*

5. Given my findings in relation to the first issue it is not necessary to address this concern, although I note that NA 224 proposes that an additional criterion should be added to D26 that would effectively address the objection.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0580) that the DD be modified by the deletion of Policy D27 and its supporting text in its entirety and by the incorporation of changes to Policy D26 and its supporting text as detailed in my recommendations on that Policy;**

**(REC.0581) that the DD be modified by the acceptance of NA 230 subject to its further modification to include a suitably worded definition of the term 'convenience goods';**

**(REC.0582) that no other modification be made to the DD in response to these objections.**

## **POLICY D28 – SAFEGUARDING VILLAGE SHOPS AND PUBLIC HOUSES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/69</b>	<b>Sustainable Gwynedd Gynladwy</b>		<b>19</b>
<b>B/1005/13</b>	<b>British Telecommunications PLC</b>		<b>603</b>

### **Note**

- Although objection B/1005/13 cites Policy D28 it is evident from the representation that it ought to refer to Policy D26 and, thus, I have dealt with the objection under that policy.

### **Main Issue**

- The restriction on the change of use of village shops and public houses.

### **Inspector's Considerations and Conclusions**

1. The objector is concerned that the Policy could prove to be an unreasonable restriction on the owner of such a business in circumstances where the enterprise is declining. It is also contended that circumstances may arise where there is a continued demand for the service it provides even though the business is economically no longer viable. MIPPS 02/2005: Planning for Retailing and Town Centres acknowledges that corner shops, village shops in rural areas and public houses can play a vital economic and social role and their loss can be damaging to the local community. The Plan deals with corner shops in Policy D25.

2. In assessing the reasonableness of the requirements of D29 I note that it stipulates that not only should the shop or pub be proven to be no longer economically viable but that there is also a similar service that is reasonably accessible by means other than the car. I consider that it is unreasonable to prevent the change of use of a building where it is proven that its business is not viable only on the basis that there is a lack of an acceptable alternative provision. In such cases it is most likely that the business would cease operating and the building would remain unused. It seems to me that the Council's more pragmatic response to a similar objection to Policy D25 leads to a more reasonable approach and that it should form the basis for revisions to this Policy.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0583) that the DD be modified by deleting “all the following criteria can be met:” from the opening sentence of the Policy and deleting the subsequent 3 criteria in their entirety and replacing them with the text set out in the first criterion of NAP 56 and as amended by my Recommendation on Policy D25**

**(REC.0584) that no other modification be made to the DD in response to this objection.**

## POLICY D30 – RETAILING IN THE COUNTRYSIDE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA228

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/70	Sustainable Gwynedd Gynladwy		78

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/34	CPRW		78
B/734/187	Welsh Assembly Government		78

### Main Issues

- The scope of the Policy.
- Whether the Policy aligns with national planning policy.
- Restricting retail units in the countryside to sell only local produce.

### Inspector's Considerations and Conclusions

#### *The scope of the Policy*

1. The objector suggests that the scope of the Policy is not clear, and assumes that it is intended to cover farm shops. However, I consider that the information contained with criterion 1. of the Policy and in its supporting paragraph provides adequate explanation of the types of shops that the Policy seeks to address. There is no need to supplement the Policy in this respect.

#### *Whether the Policy aligns with national planning policy*

2. Objection is raised to the Policy's stipulations that the shop must be ancillary to an existing viable development and that most of the goods sold are locally produced. It contends that the Policy does not align with TAN6: Agricultural and Rural Development. The Council accepts the comments and has produced NA 228 in response. However, it seems to me that the potential scope for retailing in the countryside is greatly increased as a result of the Pre-inquiry Proposed Change to criterion 1. of the Policy. Whilst I agree with its proposed deletion of the phrase "existing viable development", the introduction of a requirement that a shop be

"run in conjunction with an existing business on the site" rather than being "ancillary" could allow a large-scale retail operation to be undertaken provided it is linked to an existing business whatever of its size. This would run counter to the Plan's overall retail and rural development strategies. This potential for dispersal would run counter to the principle of sustainable development that underpins the Plan. I am mindful of the advice in paragraph 10.3.10 of MIPPS 02/2005: Planning for Retailing and Town Centres which recognises the useful role that "Shops ancillary to other uses, such as farm shops, that will help meet the demand for fresh produce, craft shops and shops linked to petrol stations ..." can play in rural areas. The MIPPS represents the latest expression of national policy, post-dating the TAN by some 9 years. Nevertheless, I acknowledge the veracity of the point made in the TAN that ancillary uses do not require specific planning permission, and by implication is not a matter which planning policies need to address. Therefore, I suggest that rather than requiring shops to be 'ancillary' they should be 'subservient' to the existing business. This would ensure that the shop serves the existing business (rather than merely being linked to it) even where the extent of the retail activity is such that it represents a material change in the use of the planning unit.

*Restricting retail units in the countryside to sell only local produce*

3. NA 228 deletes the requirement that most of the goods sold are produced within the planning unit. However, I consider that the indication contained within the supporting text of this Pre-inquiry Proposed Change that conditions may be used to limit the nature of the retail activity, is a reasonable safeguard for nearby village shops.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0585) that the DD be modified by the acceptance of NA 228 as further amended by the deletion of criterion 1. and its replacement with wording as follows: – "that the shop is a subservient element of an existing business on the site" and that the supporting text is amended to reflect and explain this further change to the Policy;**

**(REC.0586) that no other modification be made to the DD in response to these objections.**

**POLICY D31 – RETAILING AND INDUSTRIAL UNITS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/870/71</b>	<b>Sustainable Gwynedd Gynaladwy</b>		

## POLICY D32 – CAR BOOT SALES AND MARKETS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA229

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/776/21	Environment Agency Wales		79

### Main Issue

- Whether the Policy should include a criterion addressing refuse collection and recycling.

### Inspector's Considerations and Conclusions

1. In response to an objection, NA 229 introduces an additional criterion that requires provision of suitable refuse collection and recycling facilities. Given the particular relevance of such matters to retail developments of the nature envisaged by the Policy, I concur that this criterion ought to be included.

### RECOMMENDATIONS

I recommend:

**(REC.0587) that the DD be modified by the acceptance of NA 229;**

**(REC.0588) that no other modification be made to the DD in response to these objections.**

## MONITORING

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/72	Sustainable Gwynedd Gynaladwy		20

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/870/73	Sustainable Gwynedd Gynaladwy		

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and guidance.

### Inspector's Considerations and Conclusions

1. The LPA proposes in section 6.5 of the DD that among the monitoring targets relating to maintaining growth in the economy and employment should be one to increase the number of industrial/business units. The objector argues that this is not appropriate and should be replaced with targets to increase the quality of design of business units and reduce the negative environmental impact of these.

2. PPW (Chapter 7) advises that WAG is committed to building a modern economy with a broad economic base. To achieve this the number and quality of jobs must be increased. Economic performance must be boosted and GDP per capita raised in Wales. Businesses must be helped to maximise their effectiveness. All communities need new employment opportunities. LPAs should formulate land-use policies for industrial and other employment-generating and wealth creating development. In this context it is necessary, as the LPA proposes, to monitor the change in the rate of increase of industrial/business units. The monitoring measures suggested by the objector would require subjective judgement which would not lend itself to consistent documentation of trends over time. A further measure suggested by the objector relates to the provision of specialist advice to the LPA and is not a monitoring measure at all.

**RECOMMENDATION**

**I recommend:**

**(REC.0589) that no modification be made to the DD in response to this objection.**

## GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/870/56	Sustainable Gwynedd Gynladwy		604

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/222	Welsh Assembly Government		

### Note

- Objection B/870/56 is dealt with in the section of this report which relates to Policy D8.



## NEW POLICY – OFFICE DEVELOPMENT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA231

### Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/734/2199		Welsh Assembly Government		643

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and advice.

### Inspector's Considerations and Conclusions

1. The LPA proposes, via NA 231, to introduce a new policy at Pre-inquiry Change stage to guide the determination of planning applications for the development of those offices which are included within the B1 use class. The objector argues that the policy should incorporate the sequential approach to the selection of sites which is referred to in PPW (paragraph 10.2.9). This advocates such an approach in relation to retail and leisure development and also other uses which are best located in centres. These are uses which need to be accessible to a large number of people and include commercial offices and those of central and local government bodies.

2. The Town and Country Planning (Use Classes) Order 1987 makes the distinction between Class A2 which consists of uses (including offices) which will generally be found in shopping areas and those in Class B1 which include offices other than in Class A2 (i.e. those where there is not the same requirement to provide services to visiting members of the public). The advice of PPW (paragraph 10.2.9) specifically requires the application of the sequential approach to the sort of offices that need to be accessible to large numbers of people and, therefore, to be located in town centres, i.e. those in Class A2. The policy to be introduced by NA 231 applies only to offices within the B1 Use Class. There is, therefore, no basis in PPW advice for it to incorporate a sequential approach.

### RECOMMENDATIONS

I recommend:

**(REC.0590) that the DD be modified by the acceptance of NA 231;**

**(REC.0591) that no other modification be made to the DD in response to this objection.**

## EMPLOYMENT LAND IN ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
<b>B/48/1</b>	<b>Alex Badley</b>		<b>198</b>
<b>B/335/1</b>	<b>Mobile Services Ltd</b>		<b>564</b>

### Note

- Objection A/253/2004 was made at Pre-inquiry Change stage and proposed the allocation of a particular area of land in Abersoch for employment. The LPA argues that this objection does not relate to any change which it has proposed. At the relevant inquiry session it confirmed that it considers it to be not duly made and that it does not want me to consider this. Having regard to the advice of 'Unitary Development Plans – A Guide to Procedures' (paragraph 1.7) it is clear that the LPA has the discretion as to whether non-duly-made objections are considered by the Inspector. In view of the LPA's stance, I will not consider this objection.

### Main Issue

- Whether the DD is appropriate, having regard to the lack of specific allocations of employment land at Abersoch.

### Inspector's Considerations and Conclusions

1. Objectors argue that land should be allocated at Abersoch to allow the development of small business units to support the local economy. The employment policies and proposals of the UDP are based on the information provided by the 'Gwynedd Industrial Land Capacity Study 2000' which indicated that there was sufficient land to meet perceived need in most parts of Gwynedd for the period to 2016. The LPA considered, however, on the basis of the study's findings that some sites, although available, were not suitable to meet existing and future employment needs due to their location or the restriction on the range of activities that could be carried out upon them. It then commissioned a 'Vacant Land Appraisal' which examined vacant employment land in detail. This revealed that, in Llyn DCA, although there was sufficient land available to accommodate future economic growth, much of it was not suitable to meet the demands of modern businesses. As a consequence of this appraisal the LPA concluded that some 3.4ha of additional land was required for general industrial (B2) development.

2. Then, via the 'Llyn Industrial Land Capacity Study' it sought to identify potential sites to meet the shortfall. Need was focused on the Urban Centre of Pwllheli but constraints of topography and flood risk limited options there. To the

west of that town, in the vicinity of Abersoch, a broad range of environmental constraints were identified with much of the area designated as either an Area of Outstanding Natural Beauty or as a Landscape Conservation Area. A major factor was that development in this area would increase traffic levels through the already congested centre of Pwllheli.

3. I agree with the LPA that these factors support its approach in not making specific allocations of land for employment at Abersoch. Such action is not, in any case, necessary because the UDP, via DD Policy D7, provides that proposals to build units for industry or businesses within Development Boundaries will be approved provided that stated criteria can be satisfied. DD Policy D8, furthermore, provides that proposals to build rural workshops or small scale industrial/business units outside Development Boundaries will be approved if stated criteria are satisfied. The UDP, therefore, provides the framework within which schemes of development of the sort envisaged by the objectors can be appraised and, if appropriate, approved.

### **RECOMMENDATION**

**I recommend:**

**(REC.0592) that no modification be made to the DD in response to these objections.**

## LAND WEST OF HALFORDS, CAERNARFON ROAD, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/322/8	Morbaine Ltd		627

### Main Issue

- Whether the DD is appropriate, having regard to the framework of Government planning policy and advice.

### Inspector's Considerations and Conclusions

1. The Development Boundary of the Sub-regional Centre of Bangor has been drawn at DD stage to, among other things, encompass the existing extent of the recently developed retail and commercial area along Caernarfon Road. The objector argues that it should be extended to include a further substantial area at the end of this ribbon of development, furthest from the city centre, in order that it can be developed for retail purposes.

2. Ministerial Interim Planning Policy Statement 02/2005 (paragraphs 10.2.10 and 10.2.11) advises that, in deciding whether to identify sites for retail development, LPAs should in the first instance consider whether there is a need for additional provision in quantitative and/or qualitative terms. If there is a need then it should adopt a sequential approach to the selection of sites. First preference should be for town centre locations, followed by edge of town centres, then by district and local centres and only then by out-of-centre sites. These least preferred sites are acceptable only if they are accessible by a choice of means of transport.

3. The Ministerial Interim Policy Statement (paragraph 10.2.13) advises that development plans should allocate sites for new retail facilities, and other uses which are best located in town centres, where there is assessed to be a quantitative or qualitative need, using the sequential approach. The objector's site is at the south western end of a ribbon of retail and commercial development along one of the principal approach roads to Bangor city centre. This ribbon itself is detached from the consolidated retail area of the city centre, being separated from it by an extensive belt of residential development. The ribbon is, itself, an out-of-centre shopping area. The objector's site is within the countryside beyond the outermost part of this, some 2.5km from the main shopping centre of the city.

4. The objector has not submitted to the inquiry any evidence of need for the development nor has he sought to justify his proposal in terms of the sequential approach. No evidence has been presented in relation to its accessibility by a choice of modes of transport. There is, therefore, no basis on which I can recommend that the plan be modified as the objector seeks.

**RECOMMENDATION**

**I recommend:**

**(REC.0593) that no modification be made to the DD in response to this objection.**

## BRYN CEGIN ESTATE, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/15	Environment Watch Wales & the Borders		106

### Unconditionally Withdrawn Objections to Draft Deposit

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/19	CPRW		

### Main Issue

- Whether the DD is appropriate, having regard to the planning status of the employment land at Bryn Cegin, Llandegai.

### Inspector's Considerations and Conclusions

1. The DD in Policy D2 identifies the Bryn Cegin Estate at Llandegai as an industrial site to be safeguarded for B1 and B2 uses. The objector considers that it is not appropriate to develop land in this location for employment. The designation of this land as a safeguarded site reflects the current level of commitment to its development for these purposes. The site received outline planning permission for its development for B1 and B2 use, the provision of a new access, infrastructure and planting on 24/01/01. It was, at the time of the inquiry, in the course of development in accordance with the subsequent approval of reserved matters. The purpose of Policy D2 is to retain the land in employment use in accordance with its planning permission and prevent it being used to accommodate other activities. Because the principle of its employment use has already been established, this objection has been made on a mistaken basis. It cannot be given effect via the plan-making process.

### RECOMMENDATION

I recommend:

**(REC.0594) that no modification be made to the DD in response to this objection.**

## CAERNARFON ROAD RETAIL PARK, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/927/1	Morley Management	Tim Dean	85
B/991/1	Finneys	Jan Tyrer	585

### Note

- The section of this report which relates to Policy D26 is relevant to the matters raised in relation to this site.

### Main Issues

- The merits of retail development of land adjacent to Matalan, Bangor Retail Park.
- The merits of retail development of land to the south of the junction of the A55 and A4087 roads.

### Inspector's Considerations and Conclusions

*The merits of retail development of land adjacent to Matalan, Bangor Retail Park*

1. An objector refers to land adjacent to the existing Matalan unit within the Bangor Retail Park, Caernarfon Road, Bangor. He argues that it should be included within the defined Town Centre Boundary of Bangor in order that it may benefit from the presumption in favour of retail development which is provided by Policy D21. The defined town centre of Bangor is, however, limited to the principal retail area of that city. Its nearest edge is more than 2km distant from this site to the north east. There is no Town Centre Boundary proposed for the Bangor Retail Park which could be extended as the objector seeks.

2. Ministerial Interim Planning Policy Statement 02/2005 (paragraphs 10.2.10 and 10.2.11) does, in any case, advise that in deciding whether to identify sites for retail development LPAs should in the first instance consider whether there is a need for additional provision in quantitative or qualitative terms. If there is a need then it should adopt a sequential approach to the selection of sites. First preference should be for town centre locations followed by edge of town centres, then by district and local centres and only then by out-of-centre sites. These least preferred sites are acceptable only if they are accessible by a choice of means of transport.

3. The Ministerial Interim Planning Policy Statement (paragraph 10.2.13) advises that development plans should allocate sites for new retail facilities, and other uses best located in town centres, where there is assessed to be a

quantitative or qualitative need, using the sequential approach. The objector argues that there is a quantitative need for additional retailing within key centres, particularly Bangor, but presents no evidence to support this general proposition. He does not attempt to demonstrate that development of his land, which is at the edge of the built-up area of the city, is justified by the sequential approach to site selection. There is, therefore, no basis on which I can conclude that his land should benefit from a presumption in favour of retail development.

*The merits of retail development of land to the south of the junction of the A55 and A4087 roads*

4. An objector argues that the UDP should make a special allocation of land for a future superstore/retail warehouse development on land in the open countryside to the south of the junction of the A55 and A4087 roads at the south western edge of Bangor. He refers to the Ministerial Interim Planning Policy Statement 02/2005 (paragraph 10.3.12) which recognises that some types of retailing such as stores selling bulky goods and requiring large showrooms may not be able to find suitable sites in town centres. Such stores should be located at edge-of-centre sites or, where such sites are not available, at locations accessible to a choice of means of transport. Retail parks where such stores are grouped should be considered only where they are accessible to public transport as well as private transport. The need for retail parks should be tested in accordance with the principles set out in paragraph 10.3.1. These emphasise the importance of the sequential approach to site selection and the need to consider the impact of development on existing centres.

5. The objector argues that his proposed retail allocation would consolidate the ribbon of retail development which has grown along Caernarfon Road to the north east of the site. That latter area has developed as a retail park along both sides of a principal approach road to Bangor city centre. It is, itself, separated by a gap of more than 1km from the consolidated retail area of the city centre. It must be considered as an out-of-centre shopping area. The objector's site is beyond even the outer-most edge of this, separated from it by the line of the A55 dual carriageway which runs on an elevated overpass at this point. The site is visually and functionally separated by this road from the built-up area of Bangor. It lies within a landscape cell with an overwhelmingly open rural aspect. The objector's proposed development would not be in an edge-of-centre location referred to by the Ministerial Interim Planning Policy Statement (paragraph 10.3.12) or even part of an established out-of-centre retail area but, instead, would constitute an out-of-town site.

6. In the preceding subsection of this report I have referred to the advice of the Ministerial Interim Planning Policy Statement 02/2005. I note that this objector has not demonstrated a need for this development and that he has attempted to demonstrate only the most generalised sequential approach to site selection. No information has been presented upon the impact of the proposal on the existing centres nor upon the scope for serving the site by public transport. There is, therefore, no basis on which I can conclude that development of this out-of-town site is justified and that the UDP should make provision for this via a specific allocation of land.



**RECOMMENDATION**

**I recommend:**

**(REC.0595) that no modification be made to the DD in response to these objections.**

**PARC BRITANNIA, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA242

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/576/3	Sean Wood		195

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2084	CPRW	Margaret Mason	195
B/1423/2003	Watkin Jones & Son Ltd		195

**Notes**

- Objection B/884/59 is dealt with in this section of the report.
- Objections B/576/3, B/844/2084 and B/1423/2003 are responded to in LPA proof 180, not 195.
- Objections B/576/3 and B/1423/2003 are dealt with in the section of this report which relates to Parc Menai, Bangor.

**Main Issue**

- Whether the DD is appropriate, having regard to the identification of Parc Britannia, Bangor, on the Proposals Map.

**Inspector's Considerations and Conclusions**

1. The Proposals Map, at DD stage, omits the identification of the employment area of Parc Britannia as a safeguarded employment site. An objector argues that its status as an established business park should be reflected in such a designation. The LPA agrees and proposes to secure this via NA 242. An objector expresses regret that planning permission was, in the past, granted for the development of this employment area within what was part of an historic parkland. That decision has, however, been taken and the use established. I conclude that the proposed Pre-inquiry Change reflects the current planning status of this land.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0596) that the DD be modified by the acceptance of NA 242;**

**(REC.0597) that no other modification be made to the DD in response to these objections.**

**PARC MENAI , BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA240; NA241

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/879/1	Michael Tree		180
B/1341/1	Dr Sheila Roberts		180
B/1216/1	Peter Welford		180
B/1212/1	Save Britain's Heritage – Adam Wilkinson		180
B/757/1	Fred Whowell		180
B/753/1	Colonel RH Gilbertson Trust		180
B/140/1	Thomas Lloyd		180
B/159/1	Simon Warndle		180
B/827/1	W. Banks		180
B/166/1	E Michael Griffith CBE		180
B/604/1	Matthew Saunders Ancient Monument Society		180
B/790/27	Gwynedd Archaeological Trust		180
B/528/1	Mrs Mary Garner		180
B/245/3	Gwynne Jones		180
B/844/20	CPRW		180
B/815/1	Joanna Davidson		180
B/576/1	Sean Wood		195
B/1034/17	Wales National Trust	Chris Lambart	180
B/1213/1	Mrs Ann Wood		180
B/781/1	Dame Jennifer Jenkins		180
B/756/16	Environment Watch Wales & the Borders		106

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/911/16	WDA		180

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/250/4	Pentir Community Council		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2083	CPRW		180
B/815/2005	Joanna Davidson		180
B/250/2006	Pentir Community Council		180
B/879/2005	Michael Tree		180
B/1034/2026	Wales National Trust	Chris Lambart	180
B/734/2219	Welsh Assembly Government		180

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/911/2022	WDA		
B/911/2023	WDA		

### Note

- Objection B/576/1 is responded to in LPA proof 180, not 195.

### Main Issues

- The need for the allocation of additional employment land for B1 development at Bangor.
- The effect of development on historic parkland.
- The effect of development on buildings of architectural and historic interest.
- The effect of development on the setting of the Vaynol Conservation Area.
- The effect of development on the character and appearance of the rural landscape.
- The availability of alternatives to the allocation of land at Parc Menai.

## Inspector's Considerations and Conclusions

### *The need for the allocation of additional employment land for B1 development at Bangor*

1. At DD stage Policy D3 proposes that some 3.85ha of additional employment land be allocated for B1 use as an extension to the established business park at Parc Menai, Bangor. The need for this was identified by the Gwynedd Industrial Land Capacity Study 2000 and the Gwynedd Vacant Land Appraisal 2001. The LPA confirms that, because at the time of these studies planning permission had not been granted for the development of B1 and B2 uses on the site at Bryn Cegin, the contribution of that site to the employment land resource was not considered by those exercises.

2. In response to duly made objections to the DD, and as part of the monitoring process, the LPA in 2004 commissioned a re-assessment of the Gwynedd Industrial Land Capacity Study. This was completed in 2005 and noted that there was a clear lack of supply of land for offices (B1) in Bangor. It identified the shortfall as being some 11.0ha. In response to this assessment the LPA proposes, via NA 202 and NA 240, to increase the additional area of B1 employment land at Parc Menai from 3.85ha to 7.98ha.

3. Objectors argue that there is sufficient capacity in the Bangor area to accommodate the identified need for B1 development on existing committed sites and within existing vacant buildings. However, with the exception of the site at Bryn Cegin, they do not present detailed evidence that such capacity is available. They argue that the estimate of need itself could, with suitable refinement, reduce somewhat the amount of B1 development for which provision is to be made, but no detailed arguments are presented. In any case the presence adjacent to Bangor of the 36ha site at Bryn Cegin, which has received planning permission for B1 and B2 development and which could be developed in accordance with the terms of that consent, renders nugatory the arguments about the detailed assumptions which underlie the estimates of land need which arise from the LPA's various studies. I therefore accept that provision must be made for additional B1 development in the Bangor area and that detailed consideration must be given to the constraints which affect the proposals made for this by the LPA and the scope for meeting that need elsewhere.

4. An objector argues that the land at Parc Menai which is marked on the proposals map with the letter 'C' should not be allocated for employment development. That land is not, however, a proposed allocation but an established business park. The letter 'C' simply expresses the intention of the LPA to safeguard that particular area for employment purposes.

### *The effect of development on historic parkland*

5. Both the area proposed for B1 use at DD stage and that additional area proposed by the Pre-inquiry Change lie entirely within the Vaynol Historic Parkland. This is listed on the Cadw Register of Parks and Gardens of Special Historic Interest as of Grade I status. Such parks and gardens are considered by Cadw to be of exceptional interest. As recently as 2002 Cadw's Inspector of Historic Parks and Gardens, in assessing the characteristics of the Vaynol Parkland, concluded that it is a rare and precious survival. He regarded it as an important part of the historic

fabric of Wales. At the inquiry it was demonstrated that few landscape features and very little of the parkland has been lost over time. It is the high degree to which the estate is in its original visual condition that gives it value in historic terms.

6. PPW (paragraph 6.5.23) advises that LPAs should protect parks and gardens such as that at Vaynol which are on the first part of the Register of Landscapes Parks and Gardens of Special Historic Interest in Wales. They should also protect their settings.

7. The areas proposed for B1 development are, at present, extensive areas of open grassland encapsulated by belts of tall, dense, mature woodland which provide the immediate setting for Vaynol Hall itself and its associated functional estate buildings. Even if, as the LPA proposes, the buildings to be erected on the allocated land were to be effectively screened by new woodlands from the buildings at the core of the estate, the parkland setting of these would have been destroyed. The development of this land, even with effective landscaping, would therefore fail to protect the registered parkland as PPW advises.

8. Because it would very substantially erode the historic parkland setting of the group of listed buildings which forms the core of the Vaynol Estate, there would be no scope for UDP policies to secure the protection of the interests of acknowledged importance which relate to landscape quality, the Vaynol Conservation Area and the buildings of architectural and historic interest.

9. Objectors noted that there are significant undeveloped areas of land within the existing boundary of the Parc Menai Business Park. They argue that these should be developed before resort is had to an extension of its area. The LPA confirms that it regards these as essential open spaces which contribute to the spacious aspect of the business park. Their development would, it argued, unacceptably harm the character and appearance of that area. If further development that would change the character of a modern business park is unacceptable in visual terms then even greater caution should be exercised when considering the effect of development which would change the character of an area of historic parkland which contains buildings of architectural and historic interest.

*The effect of development on buildings of architectural and historic interest*

10. Vaynol Hall, itself, and its associated estate buildings, form a well defined cluster of listed buildings, some of which are of Grade I status. PPW (paragraph 6.5.7) draws attention to the statutory requirement to have regard to the desirability of preserving not only such buildings but also their setting.

11. The nature of this particular group of listed buildings is that of a stately home and the related functional buildings which were designed and laid out to serve it and its related ornamental landscape and farmland. The historic role of this building group can be properly appreciated only when it is observed within its related parkland. This latter area is an integral and essential part of the setting of this group. If this was significantly degraded, so too would be the historic and architectural value of the buildings themselves.

*The effect of development on the setting of the Vaynol Conservation Area*

12. The Vaynol Conservation Area has been designated to encapsulate the listed building group and the part of the historic parkland which consists of its ornamental landscape setting. PPW (paragraph 6.5.15) draws attention to the objective of preserving or enhancing the character or appearance of conservation areas and their settings.

13. The proposed areas of B1 development would abut the northern edge of the Vaynol Conservation Area. This area is characterised by its spacious aspect. Development, in accordance with the LPA's proposals at DD and Pre-inquiry Change stages, would very significantly erode this on the northern side of the conservation area. This would be the case even if the new buildings were screened by landscape planting because, to be effective, this would have to be tall and dense. It would, furthermore, have to be located immediately adjacent to the boundary of the conservation area and most of the listed buildings it contains. Because the proposed B1 development, either on its own or in combination with landscape planting, would very significantly erode the spacious setting of the conservation area it would neither preserve nor enhance its character or appearance.

*The effect of development on the character and appearance of the rural landscape*

14. Objectors argue that buildings erected on the area of the proposed B1 allocation would be visually intrusive. At my site inspection I carefully examined the scope for near and more distant views of structures erected on the site, including from vantage points on the Anglesey shore of the Menai Straits and, in particular, the grounds of the National Trust property of Plas Newydd. I am satisfied that, in combination, the local land form and the presence of tall dense mature tree belts and woodlands provides sufficient scope for the detailed design and layout of development, incorporating careful control of building height and landscaping, to avoid unacceptable impact on the wider landscape.

*The availability of alternatives to the allocation of land at Parc Menai*

15. The Gwynedd Employment Land Study 2005 identified two options to meet the identified requirement for B1 land at Bangor. One was the extension to the Parc Menai Business Park, some 4km to the west of Bangor city centre (which has formed the basis for the LPA's proposals at DD and proposed Pre-inquiry Change stages). The other was to rely on the development of land at Bryn Cegin some 3km to the south of the city centre. The study recognised that this latter site had recently received planning permission for B1 and B2 development. It was considered to have good transport links and the potential to provide a good quality environment for business. The site as a whole has an area of some 36ha. The study anticipated that only 6ha of this would be needed to meet needs for B2 development during the lifetime of the emerging UDP (i.e. to 2016). The study considered that there was more than sufficient land available at Bryn Cegin to meet the whole of the identified need for B1 development at Bangor.

16. Notwithstanding the conclusions of the Gwynedd Employment Land Study 2005 that Bryn Cegin has the qualities necessary to provide a good quality business environment, the 'Property Strategy for Employment in Wales (2004-2008)' prepared by DIEN (the former WDA) considers this site to be not the



equivalent of Parc Menai in all respects. This matter was explored at the inquiry. It is clear that the differences between the two sites are matters of subjective judgment rather than of quantified, objective measures. Even if the site at Bryn Cegin does not have all the business-related attributes of an extension to Parc Menai, this is more than outweighed by the harm that would be caused to interests of acknowledged importance at the latter site.

17. On the basis of the Gwynedd Employment Land Study 2005 the LPA Officers recommended to the Gwynedd UDP Working Group of elected members that the extension of Parc Menai, which had been proposed at DD stage, should be deleted because the identified demand for B1 development could be satisfied during the lifetime of the plan in another less sensitive place, i.e. at Bryn Cegin. For this reason the need for B1 development in the Bangor area did not justify development of land of the sensitive historic character of Vaynol Park.

18. The Working Group asked the LPA Officers to reconsider the matter. They duly did so and, in a subsequent report to the LPA's Environment Committee, concluded that the Parc Menai option would provide a prestige site for businesses in the service sector. There was said to be a substantial interest by companies in the information technology sector in a location at Bangor and this could be best satisfied at Parc Menai because that was already the location of the Centre for Advanced Software Technology (CAST). They recommended that not only should the DD allocation for B1 uses at Parc Menai be retained but that a further adjacent area of land be allocated for this purpose at Pre-inquiry Change stage.

19. The LPA Officers justified their changed recommendation by arguing that, until the development at Bryn Cegin matured, it would be difficult to transplant businesses to it from Parc Menai. Such transfers are not necessarily the object of the exercise however. The additional area to be allocated is, on the basis of the studies quoted by the LPA, to provide for new inward investment. The LPA Officers referred to the benefits to be gained from grouping information technology businesses together but the very essence of such enterprises is that they are capable of liaison at a distance via telecommunications. They also refer to the argument in the DD (paragraph 6.2.11) that the allocation of additional land at Parc Menai would enable that existing business park to reach a size at which its growth would become self-sustaining. No reasoned arguments were, however, presented to justify any particular size thresholds at which this process would begin and end. It conceded that, if it was possible to detect such an effect, this would be possible only in hindsight. The LPA, via NA 204, proposes to delete reference to that factor from the plan. In any case, due to the tight and weighty constraints to further expansion at Parc Menai, to which I have referred in the preceding sub-sections, self-sustaining growth in terms of increased land-take is not a desirable objective there.

20. The LPA, at the inquiry, argued that because planning permission had already been granted for B1 and B2 uses at Bryn Cegin it was not in a position to promote the development of the site solely for B1 uses. This is not, however, necessary. Only some 8.0ha of this 36.0ha site would be needed to provide an alternative to the land proposed for B1 uses as an extension to Parc Menai. The actual scale, pace and role of development at Bryn Cegin could safely be left to the market. If the conclusions of the Gwynedd Industrial Land Capacity Study 2005 are correct, the demand for B1 development will express itself in the detailed proposals for the development of Bryn Cegin. If such development is not promoted there

then this will be because the conclusions of that study were not soundly based and allocations on the anticipated scale are not necessary either at Bryn Cegin or at Parc Menai.

21. The LPA argues that Bryn Cegin is not suitable to accommodate the type of B1 development that could be accommodated at Parc Menai. It could not however, at the inquiry, clarify the distinction to be made between the B1 development that might be attracted to each site. In any case the estimate of demand for B1 development in the Gwynedd Industrial Land Capacity Study 2005 was based on the concept of B1 development as a whole. It did not attempt to refine this category further. If there really are two or more different types of B1 development to be accommodated via the UDP there can, therefore, be no certainty that the sort that will come to Bangor will be the sort that can go only to Parc Menai.

22. For all these reasons I conclude that the identified need for additional land for B1 development at Bangor can be satisfactorily accommodated at Bryn Cegin. This, together with the clear harm to interests of acknowledged importance that would arise from development adjacent to the Parc Menai Business Park leads to my conclusion that no further allocations of land should be made in the latter location.

23. The LPA, via NA 242, proposes to extend the area of safeguarded employment land at Parc Menai to reflect a grant of planning permission. An objector argues that an area in addition to that proposed by NA 242 should be identified as safeguarded employment land. This further area is not in an established employment use and no planning permission has been granted for this. It does not, therefore, qualify to be safeguarded for employment under either Policy D1 or D2. The objector, at the inquiry, clarified that he sought the allocation of this additional area for employment purposes.

24. The majority of this area of land is occupied by a dense woodland which is protected by a 'Woodland' Tree Preservation Order. The objector argues that the trees upon it were grown as a commercial crop. Even if these were to be harvested they would, however, have to be replaced under the terms of that Order in order to maintain the role of the woodland in the landscape. In any case, for the reasons I have given elsewhere in this section of the report, the identified need for B1 and B2 development at Bangor can be accommodated on land at Bryn Cegin which already has planning permission for this purpose. PPW (paragraph 2.3.2) advises that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take. There can, therefore, be no justification for an additional employment land allocation which duplicates provision already made in the locality.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0598) that the DD be modified by the deletion of the proposed allocation of land for B1 development at Parc Menai, Bangor;**

**(REC.0599) that NA 202 (insofar as this relates to Parc Menai, Bangor), and NA240 be not accepted;**

**(REC.0600) that the DD be modified by the acceptance of NA 204;**

**(REC.0601) that no other modification be made to the DD in response to these objections.**

## OLD RUGBY FIELDS AT Y DDÔL, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/693/5	Dafydd Gwallter Dafis		445

### Main Issue

- Whether the DD is appropriate, having regard to the framework of the Government's planning policy and guidance.

### Inspector's Considerations and Conclusions

1. The DD, in policy D2, proposes that land at Tanygrisiau, Blaenau Ffestiniog, be safeguarded for industrial/business development. This land has been prepared for this purpose by the provision of infrastructure via funding provided by the former Welsh Office Strategic Development Scheme. It has been the subject of a grant of outline planning permission for its development for B1 and B2 development. It is owned by the LPA but is held on a long lease by the local rugby club. That current occupier is to be re-located to another site once problems have been resolved there.

2. The objector argues that the site should be retained in use as a recreational amenity. He considers, furthermore, that there is sufficient employment land elsewhere in the town. He does not, however, justify the latter aspect of his argument by reference to any analysis of requirement for and supply of land for employment. PPW (paragraph 7.2.7) advises that, in recognition of the need for industrial land banks and because certain industrial users have characteristics that preclude their location in mixed use areas, the sites (such as that which is subject to this objection) which are designated for industrial development, should not be used for other single purposes such as leisure that could be located elsewhere. The fact that this land has received investment in infrastructure to prepare it for future employment development reinforces my conclusion that it should continue to be safeguarded for employment use.

### RECOMMENDATION

I recommend:

**(REC.0602) that no modification be made to the DD in response to this objection.**

## BRYN LLANGEDWYDD EMPLOYMENT SITE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA326

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/173	Welsh Assembly Government		105
B/887/1	Roger Williams-Ellis OBE	Chris Williams-Ellis	105
B/737/1	Christopher Rupert Williams Ellis		105
B/756/14	Environment Watch Wales & the Borders		105
B/844/25	CPRW		105
A/133/1	David Jones		105
B/774/5	John Jones		105
B/775/1	R Owen		105
B/1344/1	David Jones		105
B/760/52	CCW		105
B/774/3	John Jones		105
B/801/1	Farmers Union for Wales		105

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2155	Environment Watch Wales & the Borders		

### Main Issues

- The need for the allocation.
- The effect of development on the promotion of a sustainable pattern of settlement.
- The effect of development on the best and most versatile agricultural land.
- The effect of development on the character of the rural landscape.
- The effect of development on the safe and free flow of traffic.
- The effect of development on nature conservation interests.
- The effect of development on residential amenity.

## Inspector's Considerations and Conclusions

### *The need for the allocation*

1. At DD stage Policy D3 proposes that 8.0ha of land at Bryn Llangedwydd, Y Ffor, be allocated as an additional area of employment land for B1, B2 or B8 uses. At Pre-inquiry Change stage the LPA proposes, via NA 202 and NA 326, to reduce the area of the allocation to 4.0ha and restrict development to the B1 and B2 use classes.
2. The LPA's proposal is based on a series of studies. The Gwynedd Industrial Land Capacity Study 2000 assessed the then existing provision of industrial and business sites in Gwynedd (including the area of the Snowdonia National Park). This indicated that there was sufficient land to meet needs in most parts of that area for the whole of the UDP period, but the LPA concluded that some sites were not suitable to meet existing or future needs due to their location or the fact that some of them were restricted to particular use classes.
3. It then, via the Gwynedd Industrial Land Capacity – Vacant Land Appraisal, undertook a detailed examination of the site-specific issues related to the sites identified in the preceding study. This concluded that, while there was ample land available in the Llyn DCA to accommodate likely future economic growth, much of it was not suitable to meet the demands of modern businesses. In the view of the LPA a further 3.4ha of unconstrained land was required for B2 uses.
4. The LPA undertook the Gwynedd Industrial Land Capacity – Llyn Industrial Land Capacity Study to identify potential sites to meet that requirement. The need/demand was considered to be focused on the Urban Centre of Pwllheli but, due to identified constraints of topography and flood risk, locations outside that town would have to be examined. This exercise led to the identification of the land at Bryn Llangedwydd. Subsequent studies, the Gwynedd Employment Land Study 2005 and the Pwllheli and its Hinterland Report 2005 did, however, raise concerns about the suitability of that site.
5. The LPA decided, nevertheless, to pursue the allocation of this land via the UDP process because it gave priority to meeting the employment land requirements of the Llyn Dependency Catchment Area (DCA) within that area. In its proof No 105 (paragraph 4.8) it clearly expresses the view that sites located elsewhere, e.g. within the Porthmadog DCA, would not meet the employment land requirements of Llyn DCA. In the sections of this report which relate to The Plan's Strategy and Policy CH1 I consider the concept of the Dependency Catchment Areas. For the reasons I give there I have concluded that DCAs do not provide a sound basis for the distribution of housing land requirement and supply. In particular, their use by the LPA as 'water-tight compartments' which unduly constrain the distribution of housing allocations has actively promoted an unsustainable pattern of settlement in respect of that aspect of the plan by diverting housing allocations to smaller settlements within the same DCA when capacity in the larger settlements is not available, rather than diverting it to settlements of the same status in an adjoining DCA. These considerations apply equally to the employment land aspects.
6. The LPA itself (in its Proof No 198, paragraph 4.6) confirms, for the reasons it gives there, that only sites to the east and north of Pwllheli are considered by it

to have the potential to accommodate additional employment land allocations to serve needs arising in that settlement. It has rejected the option of land in substantial settlements to the east because that would lie within another DCA. It has therefore opted for land in the open countryside some distance to the north of Pwllheli at Bryn Llangedwydd.

7. The area to the east of Pwllheli, between it and Porthmadog, is served by a good quality 'A' road which has recently been significantly upgraded and which accommodates frequent bus services. It is also served by a railway line. No insuperable physical barrier impedes movement to the east of Pwllheli. The only factor which has influenced decision-making in respect of the distribution of employment land is the alignment of the DCA boundary to the east of Pwllheli. For the reasons I give in the sections of this report which relate to The Plan's Strategy and Policy CH1 I conclude that the LPA has given far too much weight to that factor. I conclude that the prospects for identifying the necessary areas of additional employment land would be significantly improved if the LPA dispensed with the concept of DCAs, or at least gave it much less weight in locations such as the south coast of the Llyn Peninsula where there are no insuperable barriers to movement and a highly developed public transport infrastructure exists. For this reason there is not, in my view, an overriding need for the allocation of land for employment development at Bryn Llangedwydd.

*The effect of development on the promotion of a sustainable pattern of settlement*

8. The proposed allocation is an area of green-field land. PPW (paragraph 2.3.2) advises that planning policies and proposals should promote resource-efficient settlement patterns which reflect a preference for the re-use of suitable previously developed land and buildings wherever possible. I recognise that supplies of this are in short supply in the plan area and that there may, inevitably, be a need for green-field land to be used. PPW (paragraph 2.5.3) does, however, advise that major generators of travel demand such as employment should be located within existing urban areas or in other locations which are or can be well served by public transport or can be reached by walking or cycling. Sites which are unlikely to be well served by public transport, walking or cycling should either not be allocated for development or should be allocated for uses which are not travel intensive.

9. The site at Bryn Llangedwydd is located in the open countryside some 6km to the north of Pwllheli. A bus service along the A499 passes the site but is not of a frequency comparable to that along the southern coast of the Llyn Peninsula between Porthmadog and Pwllheli. The site cannot be said to be well served by this mode of transport. Due to the remoteness of this site from any significant settlement, walking or cycling to work would not be realistic options. The allocation of this land would, inevitably, stimulate the use of the private car for virtually all of the travel to work trips of the workforce. It would not, via its location, minimise the demand for travel, especially by private car. It would not therefore conform to the advice of PPW (paragraph 2.3.2). I conclude, for these reasons, that the allocation would promote an unsustainable pattern of settlement.

*Effect of development on the best and most versatile agricultural land*

10. The proposed employment land allocation would use land of agricultural grade 3a which is classified as being of best and most versatile quality. PPW

(paragraph 2.8.1) advises that this should be conserved as a finite resource for the future. Considerable weight should be given to its protection from development because of its special importance. It should be developed only if there is an overriding need for this. For the reasons I have given in relation to the first issue I have concluded that this is not the case at Bryn Llangedwydd. It therefore follows that the consequential loss of high quality agricultural land that would arise from the site's development would run counter to Policy C28 of the Plan.

*The effect of development on the character of the rural landscape*

11. The proposed allocation would be located in an area of open countryside remote from any significant settlement. Although objectors point to its proximity to the Llyn Area of Outstanding Natural Beauty as well as a Landscape Conservation Area the site is not protected by any specific landscape designation. PPW (paragraph 5.5.1) does, however, advise that the effect of development on the landscape of any area can be a material consideration. It is necessary to balance conservation objectives with the wider economic needs of businesses and communities. In this instance, having regard to my conclusion that there is no overriding need for this allocation to be located in this particular place, I conclude that the merits of the allocation in economic terms do not outweigh the harm to the open character of the rural landscape at this point.

*The effect of development on the safe and free flow of traffic*

12. Objectors argue that the proposed allocation would harm the safe and free flow of traffic. The plan is to be read as a whole. Policy CH31 would secure that a proposed development was provided with a safe vehicular access and that the traffic generated could be accommodated by the local highway system.

*The effect of development on nature conservation interests*

13. Objectors express concern that development of this land would harm wildlife. The plan must be read as a whole. Policies B14, B15 and B16 provide protection to sites of international, national, regional and local significance for nature conservation.

*The effect of development on residential amenity*

14. Objectors express concern that development of this land would harm the living conditions of local people. The plan is to be read as a whole. Policy B22 protects the amenities of local communities.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0603) that the DD be modified by the deletion of the proposed employment land allocation at Bryn Llangedwydd, Y Ffor;**

**(REC.0604) that no other modification be made to the DD in response to these objections and, in particular, that NA 202 (in so far as it relates to this site) and NA 326 be not accepted.**



**NEAR THE AFONWEN LAUNDRY, CHWILOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA329

**Supporters of Pre-Inquiry Proposed Change**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/844/2070</b>	<b>CPRW</b>		

## AGRICULTURAL PARK, LLANYSTUMDWY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1224/1	William Edwards SQM Jet Power		468
B/844/44	CPRW		468
B/760/54	CCW		468
B/914/3	Llyr Jones		468

### Main Issue

- Whether the DD is appropriate, having regard to the planning status of the employment site at Parc Amaeth, Llanystumdwy.

### Inspector's Considerations and Conclusions

1. The DD, in Policy D2, identifies the land at Parc Amaeth, Llanystumdwy, as an industrial site to be safeguarded for B1, B2 and B8 uses. Footnote 2 to the table which relates to this policy informs that development is to be restricted to agri-food business. The objectors argue that the restriction to agri-food businesses should be reconsidered because due to the slow pace of development there is, in their view, evidently no need for such a development. They argue that land within this designation should be developed for various business purposes other than those related to agri-business.

2. The UDP must make provision for the development of land for the whole of the period to 2016. The slow pace of development in the early years of the plan is not, therefore, conclusive proof that the allocation is not soundly based. The planning permission granted in relation to this site is subject to conditions which restrict development to that associated with agricultural and food-related businesses. Development for other purposes would, furthermore, breach the conditions by which the purchase and development of the land has been funded by the European Regional Development Fund. Thus, on the basis of the evidence before me, I conclude that there is no reasonable prospect that the land could be used for the purposes referred to by the objectors in the foreseeable future.

3. Having regard to the advice of 'Unitary Development Plans – Wales' (paragraph 1.23) that the provision made in UDPs should be realistic and likely to be implemented in the period of the plan, I conclude that the scope of development on this land should not be widened as the objectors seek.

**RECOMMENDATION**

**I recommend:**

**(REC.0605) that no modification be made to the DD in response to these objections.**

## PENRHOS EMPLOYMENT SITE

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/16	Welsh Water		22

#### Main Issue

- Whether the DD is appropriate, having regard to the way in which the plan text is to be used.

#### Inspector's Considerations and Conclusions

1. DD Policy D2 identifies areas which are to be safeguarded for industrial/business purposes. The table which relates to this policy identifies such a site at Penrhos, within the Llyn DCA. The objector expresses concern that there is very little spare capacity at the local sewage works. Paragraph 6.2.2 emphasises that the individual policies of the UDP should not be read in isolation. Plan users should read the plan as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure, including the means of disposing of sewage.

#### RECOMMENDATION

I recommend:

**(REC.0606) that no modification be made to the DD in response to this objection.**

## COOKE'S SITE, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/34	Chris Wynne (North Wales Wildlife Trust)		469

### Note

- Objection B/773/34 is dealt with in the sections of this report which relate to policies D2 and D4.

## VISITOR ACCOMMODATION IN PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/661/4	Dafydd G Owen (Antur Nantlle)		393

### Main Issue

- Whether the DD is appropriate, having regard to the need to avoid planning blight.

### Inspector's Considerations and Conclusions

1. The objector argues that the land on the west side of the roundabout junction of the A487 road with the B4418 at the western edge of Penygroes should be allocated for the future development of a motel in order to satisfy what he regards as a local need for additional accommodation for visitors to that area. He does not, however, present the necessary analysis of need for and existing supply of such accommodation to justify such a significant development in the open countryside. No firm proposal has, furthermore, been submitted for such a development. 'Unitary Development Plans – Wales' (paragraph 1.23) advises that the provisions made in UDPs should be realistic and likely to be implemented during the period of the plan.

2. I have not been provided with information or arguments to demonstrate that such a development is likely to be forthcoming before 2016. Inclusion of this site within the Development Boundary of Penygroes in anticipation of such a scheme would open the way to other forms of development which would unacceptably erode the rural setting of this rural centre. In any case the plan is to be read as a whole. Policy D13 provides the framework within which proposals for the development of serviced accommodation for visitors to the area can be determined if they do arise.

### RECOMMENDATION

**I recommend:**

**(REC.0607) that no modification be made to the DD in response to this objection.**

## **PENAMSER INDUSTRIAL ESTATE, PORTHMADOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### **Objections to Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1005/14</b>	<b>British Telecommunications PLC</b>	<b>Mandip Dhillon</b>	<b>603</b>

### **Note**

- The section of this report which relates to Policy D26 is relevant to the matters raised in relation to this site.

### **Main Issue**

- Whether the DD is appropriate, having regard to the framework of Government planning policy guidance.

### **Inspector's Considerations and Conclusions**

1. The objector argues that an area within his ownership adjacent to an established industrial estate should be allocated for bulky goods retailing. Ministerial Interim Planning Policy Statement 02/2005 (paragraphs 10.2.10 and 10.2.11) advises that in deciding whether to identify sites for retail development LPAs should, in the first instance, consider whether there is a need for additional provision in quantitative and/or qualitative terms. If there is a need then it should adopt a sequential approach to the selection of sites. First preference should be for town centre locations followed by edge-of-town centres then by district and local centres and only then by out-of-centre sites. These least preferred sites are acceptable only if they are accessible by a choice of means of transport.

2. The Ministerial Interim Planning Policy Statement (paragraph 10.2.13) advises that development plans should allocate sites for retail facilities and other uses which are best located in town centres where there is assessed to be a quantitative or qualitative need, using the sequential approach to site selection. The objector has not presented evidence of need, nor has he sought to justify his proposal in terms of the sequential approach. The site is not within the town centre of Porthmadog nor is it at the edge of this. It is an out-of-centre site and no evidence is presented in relation to its accessibility by a choice of means of transport. There is, therefore, no basis on which I can recommend that the plan be modified as the objector seeks. If, subsequently, the objector considers that circumstances have changed to the extent that retail development is justified on his land, Policy D26 presents the criteria to be used to determine a proposal for retail development on land outside a defined town centre but within a Development Boundary.

**RECOMMENDATION**

**I recommend:**

**(REC.0608) that no modification be made to the DD in response to this objection.**



## GLANDON INDUSTRIAL ESTATE, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1227/1	MG Parkers Solicitors		538

### Note

- This site is referred to in the written statement of the UDP as Glanydon (not Glandon) Industrial Estate.

### Main Issue

- Whether the DD is appropriate, having regard to the framework of Government planning policy and guidance.

### Inspector's Considerations and Conclusions

1. DD Policy D2 provides that land and units on identified industrial estates will be safeguarded for industrial/business development. One of the established industrial estates referred to is Glanydon Industrial Estate, Pwllheli. The objector argues that an area of land within this should be designated for the building of a hotel and conference centre to provide accommodation for business and leisure visitors to the industrial estate and the adjacent marina.

2. Ministerial Interim Planning Policy Statement 02/2005 (paragraphs 10.2.10 and 10.2.11) advises that, in deciding whether to identify sites for leisure developments, LPAs should, in the first instance consider whether there is a need for additional provision in quantitative and/or qualitative terms. If there is a need then it should adopt a sequential approach to the selection of sites. First preference should be for town centre locations followed by edge-of-town centres and then by out-of-centre sites. These least preferred sites are acceptable only if they are accessible by a choice of means of transport.

3. The Ministerial Interim Planning Policy Statement (paragraph 10.2.13) advises that development plans should allocate sites for new leisure facilities and other uses that are best located in town centres where there is assessed to be a quantitative or qualitative need, using the sequential approach.

4. The objector has not presented evidence of need nor has he sought to justify his proposal in terms of the sequential approach. There is, therefore, no basis on which I can recommend that the plan be modified as the objector seeks. In any case, PPW (paragraph 7.2.7) advises that, in recognition of the need for industrial land banks and because certain industrial uses have characteristics that preclude

their location in mixed use areas, the sites (such as that at Glanydon, Pwllheli) which are designated for industrial development should not be used for other single purposes that could be located elsewhere. This supports my conclusion that this land should continue to be allocated in its entirety for B1, B2 and B8 uses.

## **RECOMMENDATION**

**I recommend:**

**(REC.0609) that no modification be made to the DD in response to this objection.**

## SERVICE STATION ON A55

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1033/3	Mr R Wynn-Jones	Richard C Brock	626

### Main Issue

- Whether the DD is appropriate, having regard to the need to determine proposals for highway service infrastructure.

### Inspector's Considerations and Conclusions

1. The objector argues that the UDP should make provision for roadside services on the A55 road in the vicinity of Madryn Farm, Llanfairfechan. The DD, via Policy CH17, provides that proposals to develop infrastructure and other relevant services will be approved provided that all of the stated criteria are satisfied. These relate to scale and design, the suitability of the site, impact on landscape, coast and biodiversity and the effect on the safe and free flow of traffic. The plan therefore provides a suitable framework within which a planning application for roadside services could be determined if one was submitted in respect of the objector's site.

### RECOMMENDATION

I recommend:

**(REC.0610) that no modification be made to the DD in response to this objection.**

## NEAR SNOWDONIA FIRE PROTECTION, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/10	Waunfawr Community Council		431

### Main Issue

- Whether the DD is appropriate, having regard to the need for small business development in rural areas.

### Inspector's Considerations and Conclusions

1. The objector argues that in order to sustain small rural communities it is necessary for the UDP to make provision for the development of small businesses in the countryside and, in particular, adjacent to the village of Waunfawr. The DD, in Policy D8, provides the framework for the determination of planning applications for the development of rural workshops or small scale industrial/business units outside Development Boundaries subject to these conforming to stated criteria. The related supporting paragraph 6.2.19 confirms that the aim of this policy is to permit small scale developments that are in keeping with rural areas. I conclude that, via this policy, the UDP provides scope for the determination of planning applications in relation to the type of development sought by the objector.

### RECOMMENDATION

I recommend:

**(REC.0611) that no modification be made to the DD in response to this objection.**

## DOCK AREA, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA253

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/8	Y Felinheli Community Council		574

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1034/2024	National Trust Wales		574
B/756/2117	Environment Watch Wales and the Borders		112

### Note

- Objection B/228/8 is unconditionally withdrawn.

### Main Issue

- Whether the DD is appropriate, having regard to the function and location of the dock area.

### Inspector's Considerations and Conclusions

1. At DD stage the LPA proposes that only part of the dock area at Y Felinheli should be included within the Development Boundary for that village. In response to an objection, that has now been unconditionally withdrawn, to the effect that the whole of it should be included and that it should be allocated for employment uses, the LPA agrees that the Development Boundary should be extended to include the whole of the dock. It proposes to secure this via NA 253. I agree with the objector and the LPA that this is appropriate because the area is a working dock. It includes urban features and functions as part of the village. Indeed it has been fundamental to the development of that settlement.

2. The LPA has not proposed to allocate the land for employment. This is not appropriate because a variety of desirable development options may arise and it is necessary, in the interests of promoting a sustainable pattern of settlement, to retain the flexibility to seize them. If an employment opportunity did arise DD Policy D7 would provide a framework by which such a proposal could be determined.

3. An objector notes that both the dock and the adjacent Vaynol Park wall are listed buildings. The plan must be read as a whole. Policies B2 and B3 will protect these interests of acknowledged importance.

### **RECOMMENDATIONS**

**I recommend:**

**(REC.0612) that the DD be modified by the acceptance of NA 253;**

**(REC.0613) that no other modification be made to the DD in response to these objections.**

## LON Y TRAETH EMPLOYMENT SITE, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA254

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/333/1	Gerard King (Lifetime Projects Ltd)		575

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/2010	Y Felinheli Community Council		575

### Main Issue

- Whether the DD is appropriate, having regard to the development potential of the land at Lon y Traeth, Y Felinheli.

### Inspector's Considerations and Conclusions

1. At DD stage the LPA proposes that the established employment area at Lon y Traeth, Y Felinheli, be safeguarded for employment purposes. An objector refers to the run down condition of this area and to the opportunities which exist, due to its location between the residential and commercial area of the village and the shoreline of the Menai Straits, to devise a commercially successful redevelopment which would be in the long term interest of the community. The LPA agrees and, via NA 254, proposes to delete the employment designation and identify the land as a 'Redevelopment Site'.

2. Although the proposals map at DD stage does denote 'Redevelopment Sites' there is, due to an oversight, no related policy in the written statement. The LPA proposes, via NA 142, to insert a policy for redevelopment sites. These are to be sites that provide opportunities to make effective use of previously developed land or areas that are not being fully used. They are to be in key locations within or adjacent to centres or villages and provide opportunities for a variety of uses that include tourism or leisure-related facilities, business or commercial uses, residential uses and community facilities. Further guidance about the proposed land use is to be made available in a Development Brief which will have the status of Supplementary Planning Guidance (SPG).

3. 'Unitary Development Plans – Wales' (paragraphs 2.12 to 2.14) advises that SPG is a means of setting out more detailed guidance on the way in which the policies of a UDP will be applied in particular circumstances or areas. It can take the form of Development Briefs and should be prepared in consultation with the general public, businesses and other interested parties. Their views should be taken into account before it is finalised.

4. I agree with the objector and the LPA that the Redevelopment Site approach has the potential to upgrade the appearance of this sensitive area while creating employment opportunities and community facilities. Employment opportunities arising in the new leisure-related sectors referred to by an objector may well prove more long lasting than the existing ones which a further objector wishes to see retained in this area.

5. An objector argues that the site should not be developed for housing. The details of the redevelopment scheme would be set out in a Development Brief which would be subject to public consultation. The arguments for and against the particular package of land uses should be presented there having regard, in particular, to the susceptibility of the area to flooding.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0614) that the DD be modified by the acceptance of NA 254;**

**(REC.0615) that no other modification be made to the DD in response to these objections.**



## NEAR THE INDUSTRIAL ESTATE, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA342

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2035	Welsh Water		565

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/242/2007	CPRW		

#### Note

- Objection B/969/2035 is responded to in LPA proof 22, not 565.

#### Main Issue

- Whether the DD is appropriate, having regard to the way in which the plan text is to be used.

### Inspector's Considerations and Conclusions

1. Pre-inquiry Change NA 342 proposes to extend the Development Boundary of the Village of Y Ffor and allocate the area of land thereby included within the settlement for employment uses as an extension to the established industrial estate. The objector expresses concern that there is no spare capacity at the local sewage works. Paragraph 6.2.2 emphasises that the individual policies of the UDP should not be read in isolation. Plan users should read the plan as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure, including the means of disposing of sewage. The relevant Development Brief identifies this problem and the alternative means by which it can be resolved.

### RECOMMENDATIONS

I recommend:

**(REC.0616) that the DD be modified by the acceptance of NA 342;**

**(REC.0617) that no other modification be made to the DD in response to this objection.**

## **OBJECTIONS TO THE PLAN GENERALLY**

**GENERAL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/768/3</b>	<b>Gareth Dobson</b>		<b>638</b>
<b>B/793/1</b>	<b>Michael Parry</b>		<b>638</b>
<b>B/871/8</b>	<b>Robyns Owen</b>		<b>118</b>
<b>B/1225/2</b>	<b>Network Rail Infrastructure Ltd</b>		<b>638</b>
<b>B/970/1</b>	<b>General Aviation Awareness Council</b>	<b>Ms Anna Bloomfield (Bloomfield Ltd)</b>	<b>638</b>
<b>B/990/4</b>	<b>National Offender Management Service</b>	<b>Paul Dickinson &amp; Associates</b>	<b>276</b>
<b>B/1033/1</b>	<b>Mr R Wynn-Jones</b>	<b>Richard C Brook</b>	<b>638</b>
<b>B/844/49</b>	<b>CPRW</b>		<b>638</b>
<b>B/870/3</b>	<b>Sustainable Gwynedd Gynladwy</b>		<b>638</b>
<b>B/867/6</b>	<b>House Builders Federation</b>		<b>638</b>
<b>B/914/4</b>	<b>Llyr B Jones</b>		<b>638</b>
<b>B/731/14</b>	<b>Iwan Rhys Edgar</b>		<b>611</b>

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/734/37</b>	<b>Welsh Assembly Government</b>		
<b>B/734/39</b>	<b>Welsh Assembly Government</b>		
<b>B/734/40</b>	<b>Welsh Assembly Government</b>		
<b>B/726/1</b>	<b>Tom Brooks</b>		
<b>B/773/42</b>	<b>Chris Wynne (North Wales Wildlife Trust)</b>		
<b>B/844/57</b>	<b>CPRW</b>		
<b>B/734/221</b>	<b>Welsh Assembly Government</b>		

**Supporters of Draft Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/261/1	Arthog Community Council		
B/299/1	Alan Roberts		
B/870/1	Sustainable Gwynedd Gynladwy		

**Notes**

- Objection B/1033/1 is dealt with in the section of this report which relates to the site-specific objection regarding the service station on the A55 road.
- Objection B/914/4 is dealt with in the section of this report which relates to Policy D3.
- Objection B/871/8 is dealt with in the section of this report which relates to the alignment of the Development Boundary of Llanbedrog in Llyn DCA.
- Objection B/990/4 is dealt with in the section of this report which relates to Policy CH35.
- Objection B/731/14 is dealt with in the section of this report which relates to Policy B32.

**Main Issues**

- Compliance with statutory requirements.
- The structure of the plan.
- The scope of planning policies.
- The internal consistency of the plan.
- The way in which the plan is to be used.
- The quality of the plan text.
- The relevance of the plan to aviation.

**Inspector's Considerations and Conclusions**

*Compliance with statutory requirements*

1. An objector expresses concern that the DD and its related procedures have been deliberately designed to discourage public participation in its preparation. He cites the sheer volume of the plan itself and of related documentation as evidence of this. I note, however, that other objectors have expressed the contrary view that the content of the plan should be widened yet further to make extensive reference to matters which they regard as important. At the opening of my inquiry I requested and received from the LPA the confirmation that, in the preparation of the plan, it has conformed to the statutory requirements including those for public participation. No arguments that I have heard or read have made reference to any specific matter which casts that confirmation into doubt.

*The structure of the plan*

2. The DD is structured to reflect the principal objectives which underlie a strategy of sustainable development i.e. the effective protection of the environment, the prudent use of natural resources, ensuring social progress that

recognises the needs of everyone and the maintenance of appropriate growth in the economy and employment. An objector argues that the order in which these matters are dealt with gives the impression that the LPA seeks to resist change at all costs. As the LPA makes clear in the introduction to each chapter of the plan the document is to be read as a whole. It is clear, therefore, that no particular message is to be derived from the order in which the provisions of the plan are presented.

*The scope of plan policies*

3. An objector refers to the range of matters, which he believes, are relevant to the determination of planning applications and which should be the subject of plan policies. 'Unitary Development Plans – Wales' (paragraph 2.8) confirms that the policies and proposals of the plan must be limited to those that are relevant to the development and/or other use of land. They should not duplicate provisions in other legislative regimes. They should not include statements of intent or descriptions of administrative arrangements. There is, therefore, no basis for a modification of the plan in the way sought by the objector.

*The internal consistency of the plan*

4. An objector expresses the generalised concern that the detailed measures proposed in Part 2 of the DD do not reflect the strategic policies presented in Part 1. He does not, however, draw attention to particular discrepancies. I am satisfied that, generally, the Part 2 policies and proposals seek to achieve the objectives of sustainable development which form the basis of the Part 1 policies to the extent that this is possible within a document which is limited to prescription in the field of the development and use of land.

*The way in which the plan is to be used*

5. An objector argues that a consistent approach should be taken to the structure and content of policies in which all relevant ones would contain a clause requiring that development must not result in damage to the historic or natural environment, visual amenity or harm to residential amenity.

6. Unitary Development Plans – Wales (paragraph 2.9) advises that plans should contain a limited number of generic policies to cover a variety of types of development. The DD has followed this advice by structuring the plan on the basis that it should be read as a whole. A reminder of this approach is presented in the introduction to each chapter. It is not, therefore, necessary for particular measures to be repeated within all relevant policies.

*The quality of the plan text*

7. An objector notes that the English version of the DD contains numerous grammatical errors. The LPA agrees and considers that it has identified and remedied these via its proposed Pre-inquiry Changes and Further Proposed Changes. It has most certainly not done so and, indeed, has introduced yet more errors, uncertainties and ambiguities via these processes. Not all of these have been referred to by objectors. Because clarity and certainty are the essential qualities of a development plan this is a matter which must be addressed by the LPA prior to plan adoption.

*The relevance of the plan to aviation*

8. An objector argues that the plan should include a general policy on aviation. 'Unitary Development Plans – Wales' (paragraph 2.8) advises that the policies and proposals of development plans must be relevant to the development and/or other use of land. It is not, therefore, a role of this plan to make provision which goes beyond this. Caernarfon Air Field is the only operative civil air field in the plan area. DD Policy CH25 provides that proposals which would be likely to have a harmful effect on the ability of this to operate safely and effectively will be refused. It also makes provision for the determination of planning applications for development that would improve the facilities of the airfield by setting out relevant criteria. I conclude that, in the context of Government guidance, the LPA goes as far as it can in supporting aviation interests.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0618) that the LPA carries out a thorough check on the text of the UDP as part of its preparation for the modification stage to ensure that spelling mistakes and grammatical errors are eliminated, the Welsh and English versions are consistent with each other and that it clearly and unambiguously expresses the policies and proposals it wishes to see adopted;**

**(REC.0619) that no other modification be made to the DD in response to these objections.**

## GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos: 242

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/1	Environment Watch Wales & the Borders		110

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/59	CPRW		639

### Notes

- Objection B/756/1 is responded to in LPA proof 140, not 110.
- Objection B/844/59 is dealt with in the section of this report which relates to Parc Britannia, Bangor.

### Main Issue

- Whether the DD is appropriate, having regard to the colour code used on the Proposals Map.

### Inspector's Considerations and Conclusions

1. An objector proposes his own scheme of colour coding for several of the categories of land shown on the Proposals Map. That proposed by the LPA does, however, have the merit of being a comprehensive scheme for all the relevant land uses. Changes to some of them would require changes to others. The colours used by the LPA complement each other and are capable of being readily distinguished. No significant gain in comprehension would arise from adoption of the objector's scheme.

### RECOMMENDATION

I recommend:

**(REC.0620) that no modification be made to the DD in response to these objections.**

## PROPOSALS MAPS & INSETS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/1	Environment Watch Wales & the Borders		110
B/756/17	Environment Watch Wales & the Borders		114
B/76/31	Mike Webb (RSPB)		640
B/985/14	Welsh Highland Railway	Graham Farr	482
B/844/58	CPRW		640

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/189	Welsh Assembly Government		

### Notes

- Objection B/756/1 is dealt with in the section of this report which relates to General Objections.
- Objection B/985/14 is dealt with in the section of this report which relates to the site-specific objections to Gelert Farm Works in Chapter C.

### Main Issues

- The scale of the Proposals Map.
- The protection of open spaces, wildlife habitats and cycle networks.

### Inspector's Considerations and Conclusions

#### *The scale of the Proposals Map*

1. Due to the size of the plan area the LPA has produced the Proposals Map on several sheets and has amplified this with inset maps at a scale of 1/5000. Objectors contend that the scale adopted makes these maps difficult to use. I have, in preparing for, holding and reporting on this inquiry examined all the details of every such map and have found the information presented on them to be



perfectly clear and readily understood. In my view no practical difficulties in interpretation arise from the scale selected.

*The protection of open spaces, wildlife habitats and cycle networks*

2. An objector argues that the plan makes no provision for the protection of open space, wildlife habitats and the cycle network. Landscapes of national and local importance are protected by Policies B8 to B13. Areas of importance for reasons of biodiversity and geo-diversity are protected by Policies B14 to B20. Policy B26 secures that landscaping schemes approved as an aspect of development proposals will create or reinforce wildlife corridors and habitats. Policy CH40 safeguards playing fields, play areas and open spaces of recreational value. Policy CH41 secures the provision of additional open spaces in association with new housing development. Policy CH20 safeguards all parts of the cycling network. Policy CH29 secures that provision is made for cyclists in development schemes. I conclude that the concerns of the objector are adequately reflected in the DD text.

**RECOMMENDATION**

**I recommend:**

**(REC.0621) that no modification be made to the DD in response to these objections.**

## APPENDIX/GLOSSARY

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA93; NA232; NA233; NA394; NA144; NA230; NA15

This Section is subject to Further Proposed Changes Nos: NAP5; NAP16; NAP34; NAP63

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/26	Gwynedd Archaeological Trust		13
B/1034/19	National Trust Wales	Chris Lambart	13
B/870/74	Sustainable Gwynedd Gynaladwy		13
B/870/75	Sustainable Gwynedd Gynaladwy		12
B/790/26	Gwynedd Archaeological Trust		13
B/1034/19	National Trust Wales		13
B/911/8	WDA		637

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/33	Welsh Assembly Government		128
B/844/46	CPRW		637

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/734/2220	Welsh Assembly Government		32
B/756/2098	Environment Watch Wales & the Borders		156

<b>B/790/2041</b>	<b>Gwynedd Archaeological Trust</b>		<b>637</b>
<b>B/228/2009</b>	<b>Felinheli Community Council</b>		<b>637</b>
<b>B/1030/2011</b>	<b>Univeristy of Wales Bangor</b>	<b>Sian Kilner</b>	<b>637</b>
<b>B/911/2017</b>	<b>Welsh Development Agency</b>		<b>637</b>
<b>B/353/2003</b>	<b>Robert Williams</b>		<b>177</b>
<b>B/322/2011</b>	<b>Morbaine Ltd</b>		<b>637</b>
<b>B/815/2004</b>	<b>Joanna Davidson</b>		<b>637</b>
<b>B/844/2082</b>	<b>CPRW</b>		<b>637</b>
<b>B/880/2003</b>	<b>Dr Sheila Roberts – Welsh Historic Gardens Trust</b>		<b>637</b>
<b>B/1034/2023</b>	<b>Welsh National Trust</b>	<b>Chris Lambart</b>	<b>637</b>
<b>B/790/2040</b>	<b>Gwynedd Archaeological Trust</b>		<b>637</b>

### Supporters of Pre-Inquiry Proposed Change

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/322/2009</b>	<b>Morbaine Ltd</b>		

### Notes

- This part of the DD is subject to NAP 120.
- Objections B/790/26 and B/1034/19 are duplicated in this section of the skeleton report.
- Objections B/911/8, B/322/2011, B/911/2017, B/1030/2011 and B/228/2009 are dealt with on the section of this report which relates to Affordable Housing for Local Need Text.
- Objection B/734/2220 is responded to in LPA proof 648, not 32 and is dealt with in the section of this report which relates to Policy D27.
- Objection B/353/2003 is dealt with in the section of this report which relates to objections to the omission of a housing allocation at Gwernydd, Waunfawr in Caernarfon DCA.

### Main Issues

- The assessment of the archaeological resource.
- The extent to which the historic resource is listed.
- The appropriate standards for cycle parking.
- The definition of previously developed land.

- The comprehension of plan text.

## **Inspector's Considerations and Conclusions**

### *The assessment of the archaeological resource*

1. Proposed Pre-inquiry Change NA 394, among other things, provides a definition of 'archaeological assessment' as an assessment of the known or potential archaeological resource within a specified area or site, consisting of a collation of existing written and graphic information in order to identify the likely character, extent, quality and worth of the known or potential archaeological resource in a local, regional or national context. An objector expresses concern that this definition covers only a desk-based exercise. He argues that it should be expanded to cover both this and field evaluation. The desk exercise should be regarded as a first stage and the field evaluation as a possible second stage, depending on the outcome of this.

2. The text relating to archaeological assessment which is proposed to be introduced by NA 394 does, in its second sentence, provide that 'in areas where there is likely to be archaeological remains the developer will be required to commission either an archaeological assessment and/or field evaluation in order to determine the archaeological impact of the proposed development before the planning authority determines the application'. The first sentence of this text presents a definition of what archaeological assessment involves. I conclude that the concerns of the objector can be satisfied if the paragraph is restructured so that the second sentence which refers to both archaeological assessment and field evaluation is presented first and this is followed by definitions of both these distinct processes.

### *The extent to which the historic resource is listed*

3. DD Appendix 1 is given the title 'Historic Resources' but lists only the parks and gardens that are on Part 1 of the Register of Historic Landscapes, Parks and Gardens. An objector argues that this list is incomplete and should include Broom Hall at Llanystumdwy. Another argues that it is desirable to include in the table the grade of the historic parks and gardens. The LPA agrees and proposes to secure this via NA 232. I conclude that this will provide a comprehensive basis for consistent decision making in respect of these assets. I note, however, that in preparing this proposed Pre-inquiry Change, the LPA has not accurately reflected the information provided by the National Trust for Wales that Vaynol should be recorded as a Grade I site and Wern as a Grade II. It proposes to remedy this via NAP 120 but this refers only to Vaynol and omits reference to Wern.

4. Objectors argue that the Appendix should list not only the historic parks and gardens but also the other aspects of the historic resource including conservation areas, listed buildings, scheduled ancient monuments and buildings at risk. Conservation Areas and scheduled ancient monuments are shown on the Proposals Map. The list of buildings of architectural and historic interest is an easily available statutory document. Including its content within the UDP would simply duplicate that schedule to no good purpose. The information regarding buildings at risk and unscheduled archaeological remains is subject to rapid change. It is not, therefore, suitable for presentation in a document intended to guide decision making over the period to 2016. Having regard to this, however, it is clear that the title of Appendix

1 is misleading. It should be re-worded to reflect the actual limited scope of its coverage.

*The appropriate standards for cycle parking*

5. Appendix 5 presents the minimum number of cycle parking spaces that should be provided for different categories of development. An objector argues that these are too low. He suggests that they should be based on well founded research and their source should be quoted. No alternative figures are postulated by the objector nor is any suggestion made as to the basis on which these might be formulated. The standards presented are based on those used by other local authorities. They are explicitly presented as a minimum figure and the text of the Welsh version of the DD confirms that each application will be assessed on its merits, having regard to local circumstances and the needs of the users of the property. This introduces a degree of flexibility to ensure that cycle parking provision can be adjusted to the needs of a particular site and land use. I conclude that this is as far as the LPA can go in simultaneously promoting the certainty which is required of development plans while maintaining a degree of flexibility to respond to particular circumstances.

6. I note that, due to an error, the text of the English version of the DD does not include the paragraph which makes reference to the need to assess each planning application on its merits. The LPA proposes, via NAP 5, to insert this. Because this text will not have been read by those who at the consultation stage on the DD and the proposed Pre-inquiry Changes read the English text, a full debate on its merits has not been possible. The LPA should pursue this matter at modification stage.

*The definition of previously developed land*

7. The LPA proposes, via NA 144, to insert into the DD a definition of previously developed land. An objector argues that this is inaccurate in respect of land used for mineral extraction and waste disposal. It is, however, an exact copy of the definition presented in PPW (Fig. 2.1). I conclude for this reason that it is an accurate definition.

*The comprehension of plan text*

8. An objector expresses concern that Policy A1 provides that planning applications will be refused unless sufficient information is provided with them concerning likely environmental or other impacts. The LPA agrees that a list of key policy considerations should be provided for this policy to guide prospective developers as to the circumstances where a specific impact assessment will be needed. It proposes, via NAP 62, to add a table which will refer the plan user to the key policies that should be read with Policy A1. I conclude that this would make a useful contribution to the comprehension of the plan. However, because this has not been the subject of public consultation a full debate on its merits has not been possible. If the LPA proposes to pursue this it should do so via the modification process.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0622) that the DD be modified by the acceptance of NA 144;**

**(REC.0623) that the DD be modified by the acceptance of NA 232 subject to Vaynol being shown as Grade I and the correct grading being shown for Wern;**

**(REC.0624) that the DD be modified by the acceptance of NA 394 in so far as it relates to archaeological assessment, subject to a restructuring of that paragraph to place the references to the need for archaeological assessment and/or field evaluation before a definition of both these terms;**

**(REC.0625) that the DD be modified to change the title of Appendix 1 to 'Sites/Areas included in the Register of Historic Parks, Gardens and Landscapes of Special Interest in Wales, referred to in Policy B12';**

**(REC.0626) that no other modification be made to the DD in response to these objections.**

**SITE-SPECIFIC OBJECTIONS: BALA DCA**

**SETTLEMENT STATUS: BALA DCA**



## GLANRAFON SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/4	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Glanrafon.

### Inspector's Considerations and Conclusions

1. The LPA proposes that Glanrafon should be classified as a Village. The objector argues that, by its intrinsic nature, it does not merit that status. The defined area consists of two separate areas which are each encapsulated by a proposed Development Boundary. One of these contains a small primary school and 16 houses. The other a petrol filling station and a handful of additional dwellings. Individually and collectively these are simply a sporadic development in the open countryside. The status of Village cannot be justified by the need to secure residential development sufficient to maintain the facilities at Glanrafon because the scope for such activity within the proposed Development Boundary is very small, yielding perhaps only one or two dwellings. Many settlements of larger size have been classified as only Rural Villages by the LPA. In the interests of internal consistency within the Plan as currently proposed this status should be applied to Glanrafon. However, if my recommendation (REC.0451) is accepted this classification would, itself, be removed in its entirety and such areas would be treated in policy terms as part of the open countryside.

### RECOMMENDATIONS

I recommend:

**(REC.0627) that the DD be modified in accordance with my recommendation (REC.0451);**

**(REC.0628) that the DD be modified by the removal of Village status from Glanrafon and its treatment in policy terms as a location within the open countryside;**

**(REC.0629) that no other modification be made in response to these objections.**

**HOUSING LAND ALLOCATIONS: BALA DCA**

## NEAR SCHOOL – GLAN YR AFON

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA371

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2167	Environment Watch Wales & the Borders		110

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2040	Welsh Water		

### Main Issue

- Whether the DD should be modified to incorporate the proposed housing allocation near to the school at Glan Yr Afon, having regard to the effect on the prospects of achieving a sustainable pattern of settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at Pre-inquiry Change stage, proposes, via NA 371, to extend the Development Boundary which has been drawn around a group of 16 houses at Glan Yr Afon and to allocate this small area for some 5 dwellings.

2. PPW (paragraphs 2.5.3 and 2.5.4) advises that major generators of travel demand, such as housing, should be located within urban areas or in other locations which are or can be well served by public transport or reached by walking or cycling. Sites which do not have these characteristics should not be allocated. Glan Yr Afon, itself, is a very small settlement within an entirely rural setting in the open countryside between Corwen and Bala. The proposed allocation is within a detached fragment of this which, apart from the few houses, contains only a primary school. The further detached element of this settlement contains only a petrol station and several more houses. Collectively the settlement is little more than a sporadic development in the open countryside. PPW (paragraph 9.2.21) recognises that many parts of the countryside have isolated groups of dwellings. Minor extensions to such groups may be acceptable but much depends on the character of the surroundings, the pattern of development and the accessibility to main towns and villages. An objector argues that the proposed allocation would reinforce an unsustainable pattern of settlement.

3. Notwithstanding the availability of a primary school and some minimal retail facilities at the petrol station, the residents of Glan Yr Afon have to travel to larger settlements for virtually all of their day to day needs. Due to the almost complete

absence of these at Glan Yr Afon the range of destinations to which access must be made is very great. There is a bus service between Corwen and Bala but it is limited in frequency and range of destinations. It would not satisfy anything other than a very few of the multifarious needs of residents to gain access to services. For this reason there will be a very heavy reliance on the private car. The proposed allocation would simply reinforce this. I conclude that the proposed allocation would unacceptably reinforce an unsustainable pattern of settlement.

## **RECOMMENDATION**

**I recommend:**

**(REC.0630) that no modification be made to the DD in response to these objections and, in particular, that NA 371 be not accepted.**

**NEAR MAES PRIORDY - LLANDDERFEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/790/30</b>	<b>Gwynedd Archaeological Trust</b>		

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/760/56</b>	<b>CCW</b>		

**DEVELOPMENT BOUNDARIES: BALA DCA**

**LAND NEAR PLAS GWYN, AEL Y BRYN & BRYN GLAS, LLANDDERFEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA372

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/35/2	Maldwyn Morris		463
B/35/1	Maldwyn Morris		462

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/701/1	Mr Alun Morris	Thomas Andrews & Partners	461

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2168	Environment Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary for the Village of Llandderfel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and proposes to facilitate this via NA 372. However, for the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0631) that no modification be made to the DD in response to these objections and, in particular, that NA 372 be not accepted.**



**PART OF BADWENI FIELD NEAR PONT Y LLAN, LLANDDERFEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/40/1</b>	<b>Daniel Maldwyn Jones</b>		<b>464</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

The objector argues that the proposed Development Boundary for the Village of Llandderfel should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0632) that no modification be made to the DD in response to this objection.**

**WHITE LAND, LLANDDERFEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/85</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>115</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Village of Llandderfel should be realigned to exclude areas of open countryside. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the areas referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0633) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0634) that no other modification be made to the DD in response to this objection.**

**SITE-SPECIFIC OBJECTIONS: BANGOR DCA**

**SETTLEMENT STATUS: BANGOR DCA**

## ABERPWLL SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA260

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/157/1	David Jones		496

### Supporters of Proposed Change

Ref. No	Name	Agent	Response Ref.
B/756/21 23	Environment Watch Wales & the Borders		
B/157/20 03	David Jones		

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Aberpwll.

### Inspector's Considerations and Conclusions

1. In response to an objection to the DD the LPA, via NA 148 and NA 260 proposes to classify Aberpwll as a Rural Village. This is, however, no more than a sporadic development in the open countryside. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I have concluded that the areas proposed to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms.

### RECOMMENDATION

I recommend:

**(REC.0635) that no modification be made to the DD in response to this objection and, in particular, that NA 148 and NA 260 be not accepted insofar as they relate to Aberpwll.**

**LAND AT BRYN EGLWYS, ST ANNE'S, BETHESDA**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA261

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/132/1	John Farnworth		526

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/756/2124	Environment Watch Wales & the Borders		526

**Main Issue**

- Whether the DD is appropriate, having regard to the settlement status of Bryn Eglwys, St Anne's.

**Inspector's Considerations and Conclusions**

1. In response to an objection to the DD the LPA, via NA 148 and NA 261, proposes to classify Bryn Eglwys, St Anne's, as a Rural Village. This is, however, no more than a sporadic development in the open countryside. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I have concluded that the areas proposed to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms.

**RECOMMENDATION**

**I recommend:**

**(REC.0636) that no modification be made to the DD in respect of this objection and, in particular, that NA 148 and NA 261 be not accepted insofar as they relate to Bryn Eglwys, St Anne's.**

## GLASINFRYN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/766/1	Plaid Cymru		541

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Glasinfryn.

### Inspector's Considerations and Conclusions

1. The LPA proposes that Glasinfryn be classified as a Rural Village. The objector argues that it should be reclassified as a Village. The settlement lacks all services and facilities with the exception of a bus service. Its further development on a scale appropriate to a Village would reinforce an unsustainable pattern of settlement. For that reason Glasinfryn should not be afforded that status.

### RECOMMENDATION

I recommend:

**(REC.0637) that no modification be made to the DD in response to this objection.**

## LLANDYGAI SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA255

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/14	RCH Douglas Pennant	Guy D Evans	527

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2118	Environment Watch Wales & the Borders		109
B/1659/2001	SJ O'Grady		527

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name	Agent	Response Ref
B/952/2038	RCH Douglas Pennant		

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Llandygai.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, classifies Llandygai as a Rural Village. An objector argues that it has sufficient facilities to justify a reclassification as a Village. The LPA agrees and proposes to achieve this via NA 255. The settlement contains a school and a village hall. It has a regular bus service linking it to the wide range of facilities and services of Bangor. Employment opportunities are nearby at the local industrial estate and are under construction at Bryn Cegin. Lack of retail services limits the scope for significant residential growth, but the facilities that are available justify the limited residential development that would be possible on an in-fill basis within a tightly drawn Development Boundary. Subject to this being aligned in accordance with my recommendation (REC.0443) I conclude that Llandygai should be reclassified as a Village.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0638) that the DD be modified by the acceptance of NA 255 subject to my recommendation (REC.0443);**

**(REC.0639) that no other modification be made to the DD in response to these objections.**

## TALYBONT SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/9	RCH Douglas Pennant	Guy D Evans	546

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Talybont.

### Inspector's Considerations and Conclusions

1. The DD classifies Talybont as a Rural Village. The objector argues that it should be reclassified as a Village because other settlements of similar size have been accorded that status. The crucial issue is not size but the availability of facilities. Talybont has so few of these that its residents rely on larger settlements for virtually all of their day to day needs. Although a bus service is available the range of destinations to which access must be gained is so wide that it is reasonable to assume that a significant reliance is placed on the private car. The scale of residential development that would be likely to occur if Talybont was to be classified as a village would reinforce the present unsustainable pattern of settlement.

### RECOMMENDATION

I recommend:

**(REC.0640) that no modification be made to the DD in response to this objection.**

## TY'N LÔN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/669/1	Adrian Sharratt		552

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Ty'n Lon.

### Inspector's Considerations and Conclusions

1. Ty'n Lon is classified in the DD as a Rural Village. The objector argues that, due to its lack of facilities, it should not be the location of any further development and, therefore, should not be afforded that status. The LPA argues that Ty'n Lon is on a bus route and that this single facility justifies its Rural Village classification. This approach is fundamentally flawed however, because it would allow new housing development at any point along every bus route in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I conclude that the areas proposed to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms.

### RECOMMENDATIONS

I recommend:

**(REC.0641) that the DD be modified in accordance with my recommendation (REC.0451) and, in particular, that Ty'n Lon be removed from the classification of Rural Village.**

**HOUSING GENERAL: BANGOR DCA**

## GENERAL HOUSING IN BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/785/1	Jennifer Thomas		613
B/766/4	Plaid Cymru		613
B/783/18	Welsh Language Board		497
B/135/3	Carol Morris		613
B/844/48	CPRW		613

### Note

- These objections are dealt with in the sections of this report which relate to the specific housing land allocations which are proposed by the LPA at Bangor.

**HOUSING LAND ALLOCATIONS: BANGOR DCA**

**EITHINOG/BREWERY FIELDS - BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA239

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/1293/1	Mrs P Morewood	Friends of Brewery Fields	102
B/1340/1	Mr & Mrs Baxter		102
B/1335/1	Mr V & Puranik		102
B/1149/1	Rhian Price		102
B/1283/1	Mr D Morewood	Friends of Brewery Fields	102
B/1295/1	Glyndwr & Mair Williams		105
B/767/12	Friends of the Earth (Mon & Gwynedd)		102
B/1312/1	Erwain Haf Rheinallt		102
B/1311/1	Owena Thomas		102
B/891/1	Delyth Williams		102
B/1148/1	Jackie Williams		102
B/1291/1	Delyth Lloyd-Williams		102
B/1288/1	Lynn McGreary		102
B/1337/1	Andrew Clarke		102
B/1286/1	Susan McGreary		102
B/1320/1	Neil & Sheina Morris		102
B/1339/1	James Killock	Friends of Brewery Fields	102
B/1294/1	Paul Morewood		102
B/1300/1	Susan Jones		102
B/1338/1	Philip Jones		102
B/1298/1	Kathleen Davies		102
B/1299/1	Meinir Owen		102
B/1297/1	Tom Perkins		102
B/1296/1	Lis Perkins		102
B/1306/1	Owain Davies		102
B/907/1	Ruth Williams	Friends of Brewery Fields	102
B/1313/1	P.E.C. Mackwood		102
B/1135/1	Ms B Whiley		102
B/1151/1	David Price		102

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B/890/1	Richard Williams		102
B/901/1	Brian Gower		102
B/1157/1	T Coulthard		102
B/909/1	Mr & Mrs Flockhart		102
B/1333/1	Martyn Boyce		102
B/1290/1	David Lloyd-Williams	Friends of Brewery Fields	102
B/1305/1	Suzanne Schiemenz		102
B/1304/1	Mrs H. Johnson		102
B/1302/1	Mrs Samantha Rayner		102
B/904/1	David Coyle	Friends of Brewery Fields	102
B/1301/1	R.Rigby		102
B/1307/1	Gareth Roberts		102
B/324/4	Bangor City Council		102
B/892/1	D Roberts		102
B/895/1	W&T Mimpriss		102
B/905/1	Brian Pumfrey		102
B/1303/1	Professor P Field		102
B/1211/1	D.G. & Mrs C Edwards		102
B/1289/1	Paul McFadden		102
B/1134/1	Mr & Mrs Roberts		102
B/1053/1	Rita Hughes		102
B/1074/1	James Rutherford		102
B/1084/1	Christopher Leung		102
B/1143/1	J Owen		102
B/968/1	D Thomas		102
B/1138/1	Huw Williams		102
B/1137/1	V Williams		102
B/998/1	L Parry		102
B/1203/1	Ann Dean		102
B/1147/1	Mrs Lloyd Williams		102
B/1183/1	Janice Ford		102
B/736/1	Ms Freda Wyn		102
B/1160/1	John Hughes		102
B/1062/1	Patrick Hayward		102
B/1117/1	Mrs K Pritchard		102
B/1132/1	Arthur Sunderland		102
B/1133/1	Mrs Ruth Roberts		102
B/328/1	Hefin Jones		102
B/1164/1	Ann Whelan		102
B/1145/1	Jamie Owen		102
B/1039/1	Sheena Parry		102
B/1161/1	I & G Jones		102
B/1282/1	Ben Stammers		102
B/919/1	Susan Thomas		102
B/1139/1	Nick Francis		102
B/1141/1	Sian Dewi		102



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<b>B/899/1</b>	<b>Aubrey Gower</b>		<b>102</b>
<b>B/359/1</b>	<b>David Thorpe</b>		<b>102</b>
<b>B/519/3</b>	<b>Sally Boyce (Arthritis Care)</b>		<b>102</b>
<b>B/1292/1</b>	<b>Parch Elwyn &amp; Eiflyn Roberts</b>		<b>102</b>
<b>B/1158/1</b>	<b>David Jones</b>		<b>102</b>
<b>B/1284/1</b>	<b>Manon Lloyd</b>		<b>102</b>
<b>B/722/1</b>	<b>Mrs Judith Stammers</b>		<b>102</b>
<b>B/1181/1</b>	<b>H Griffiths</b>		<b>102</b>
<b>B/1131/1</b>	<b>C Jones</b>		<b>102</b>
<b>B/1196/1</b>	<b>G Hughes</b>		<b>102</b>
<b>B/1116/1</b>	<b>Mr N Frazer &amp; Owen</b>		<b>102</b>
<b>B/1194/1</b>	<b>W Roberts</b>		<b>102</b>
<b>B/1281/1</b>	<b>Erica Ashton</b>		<b>102</b>
<b>B/1280/1</b>	<b>Meredudd ap Rheinallt</b>		<b>102</b>
<b>B/1285/1</b>	<b>Iestyn Williams</b>		<b>102</b>
<b>B/183/1</b>	<b>Stephen Harling</b>		<b>102</b>
<b>B/572/1</b>	<b>Mrs Josephine Whibley</b>		<b>102</b>
<b>B/185/1</b>	<b>Meirion &amp; Mair Davies</b>		<b>102</b>
<b>B/114/1</b>	<b>Andrew Joyce</b>		<b>102</b>
<b>B/910/1</b>	<b>Mair Roberts</b>		<b>102</b>
<b>B/148/1</b>	<b>Norman Greenhouse</b>		<b>102</b>
<b>B/250/3</b>	<b>Pentir Community Council</b>		<b>102</b>
<b>B/193/2</b>	<b>Pamela Green</b>		<b>102</b>
<b>B/915/3</b>	<b>WWF Cymru</b>		<b>102</b>
<b>B/791/1</b>	<b>Brenda Harris</b>		<b>102</b>
<b>B/247/1</b>	<b>Kate Gibbs (North Wales Wildlife Trust)</b>	<b>Kate Gibbs</b>	<b>102</b>
<b>B/861/1</b>	<b>Sian Griffith</b>		<b>102</b>
<b>B/803/1</b>	<b>John R Smith – Eithinog Community</b>		<b>102</b>
<b>B/862/1</b>	<b>Eirwen Williams</b>		<b>102</b>
<b>B/848/1</b>	<b>Tim &amp; Wendy Mimpriss</b>		<b>102</b>
<b>B/569/1</b>	<b>Mr &amp; Mrs M Hughes</b>		<b>102</b>
<b>B/571/1</b>	<b>Mai Newman</b>		<b>102</b>
<b>B/807/1</b>	<b>D Pritchard</b>		<b>102</b>
<b>B/224/1</b>	<b>Jean Williams</b>		<b>102</b>
<b>B/795/1</b>	<b>Sian W Jones – Eithinog Community</b>		<b>102</b>

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B/796/1	Glyn L Jones – Eithinog Community		102
B/785/3	Jennifer Thomas		102
B/122/1	Bethan Jones		102
B/805/1	Emrys Pritchard		102
B/231/1	John Jones		102
B/533/1	C Evans		102
B/585/1	Menai Bridge & District Civic Society		102
B/532/1	Mrs Norah Evans	Friends of Brewery Fields	102
B/804/1	B Williams		102
B/602/1	Mrs Barbro Das- Gupta		102
B/703/1	Dr Gerwyn Williams		102
B/849/1	Mr & Mrs Evans		102
B/863/1	N Owen		102
B/621/1	John Hughes		102
B/605/1	Gwyn Thomas		102
B/641/1	John Williams		102
B/643/1	Vanessa Field		102
B/637/1	Mrs Winifred Simpson		102
B/626/1	Karen Breeze		102
B/679/1	Sarah Collick		102
B/601/1	D.P.W. & Enid Roberts		102
B/222/1	Megan Jones		102
B/223/1	Alan Williams		102
B/888/1	Davida Roberts		102
B/225/1	Chris Williams		102
B/850/1	Tudor & Ruth Owen		102
B/526/1	Helen Hayes		102
B/525/1	John Hayes		102
B/766/5	Plaid Cymru		102
B/535/1	Mr Ivor McLean		102
B/847/1	Wendy Warner		102
B/808/1	B Dunningham		102
B/860/1	Charlotte Jones		102
B/806/1	Jacqueline Pritchard		102
B/629/1	Noelle Devereux		102
B/773/35	Chris Wynne		102
B/1058/1	K Haynes		102
B/1063/1	Brian Robinson		102
B/1055/1	B Roberts		102
B/1056/1	V Lewis		102
B/1071/1	Carolyn Hockedy		102

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B/245/1	Gwynne Jones		102
B/1057/1	C Burke		102
B/1051/1	Linda Owen		102
B/1075/1	Linda Lethos		102
B/1083/1	Tim Rowe		102
B/1066/1	Gillian Woodward		102
B/1096/1	Mrs G Monger		102
B/85/1	Margaret Griffiths		102
B/1124/1	Gareth Jones		102
B/889/1	Miss Alison Armstrong		102
B/896/1	Mrs G Monger		102
B/894/1	Jun Wei		102
B/906/1	Ceridwen Gower		102
B/266/1	Geraint Roberts		102
B/897/1	Mrs G Stewardson		102
B/121/2	John Tripp		102
B/1068/1	J Morris		102
B/903/1	Mrs E Owen		102
B/893/1	J Williams		102
B/281/1	Rhys Jones		102
B/282/1	Peter Martin	Friends of Brewery Fields	102
B/237/1	Dr J Ford		102
B/1061/1	Rosalind Carter		102
B/1152/1	Beryl Price		102
B/851/2	S Turner		
B/574/1	Mrs Barbara James		102
B/573/1	Miss Gwyneth Jones		102
B/841/1	Rosalie Jones		102
B/845/1	C Maylon		102
B/842/1	Mr David Jones		102
B/864/1	Mrs S Greene		102
B/846/1	M Maylon		102
B/852/1	Medi Michael		102
B/865/1	Mr D Greene		102
B/834/1	Rob Mimpriss		102
A/95/1	James Goodman		102
B/582/1	Mr D Davies		102
B/821/1	T&J Patrick		102
B/843/1	Mrs Bethan Jones		102
B/857/1	Janice Jones		102
B/1070/1	A Shears		102
B/1069/1	Shirley Shears		102
B/1115/1	Lorna Jones		102
B/1093/1	Cecil Williams		102
B/760/35	CCW		102
B/856/1	Alun Michael		102
B/853/1	Iorwerth Michael		102
B/329/1	Dr David Ball		102

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B/858/1	Ms Brown		102
B/584/1	Mr & Mrs W. Jones		102
B/583/1	Mrs W. Evans		102
B/854/1	Angharad Michael		102
B/1142/1	E Hunter		102
B/1111/1	Margaret Connell		102
B/1112/1	I Parry		102
B/1041/1	Asma Khanum		102
B/1092/1	Anne Roberts		102
B/1049/1	S Barbaresi		102
B/1122/1	Gail & Bernard Colgan		102
B/1150/1	Bethan Price		102
B/1081/1	Hugh Pritchard		102
B/1088/1	Haydn Williams		102
B/1095/1	Alfred Goodhand		102
B/1154/1	Geraint & Margaret James		102
B/1060/1	Mrs E Owen	Friends of Brewery Fields	102
B/1159/1	Richard Shon Williams		102
B/1187/1	G Barnes		102
B/1128/1	JE & NH Morris		102
B/1201/1	Sarah Jones		102
B/1099/1	Chritopher Andrews		102
B/1202/1	Susan Wyn Jones & Hefin Wyn Jones		102
B/1192/1	M Maddock		102
B/1185/1	Nia Jones		102
B/1103/1	W Jones		102
B/1079/1	C Thomas		102
B/1140/1	Suzanne Francis		102
B/1102/1	Peter Andrews		102
B/1073/1	Sinclair Buchan		102
B/1170/1	Hwys Elis-Williams		102
B/1146/1	Mrs M Kelly	Friends of brewery Fields	102
B/1191/1	Elen Ogwen	Friends of brewery Fields	102
B/1044/1	Mrs D. Williams		102
B/1174/1	Iona Williams		102
B/1109/1	John Holmes		102
B/1126/1	Anthony Pearson		102
B/1091/1	Helen McGreary		102
B/1172/1	Dr D Wayte		102
B/1189/1	Mair Roberts		102
B/1094/1	Annwen Owen		102

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B/1097/1	Anthony Andrews	Friends of Brewery Fields	102
B/1059/1	Mr K Owen	Friends of Brewery Fields	102
B/1169/1	Kieran Lynch		102
B/1086/1	Jennie Pritchard		102
B/88/1	Shirley Williams		102
B/1125/1	Huw Jones		102
B/1155/1	D.A. Scott		102
B/1104/1	Mrs J Jones		102
B/1123/1	Rhian Jones		102
B/1105/1	Rhiannon Williams & Dafydd Owens		102
B/1166/1	Val Gibbs		102
B/1188/1	C Barnes		102
B/1129/1	Laura O'Mahony		102
B/1087/1	Marian Jones		102
B/1072/1	Sarah Buchan		102
B/1108/1	Richard Coveney		102
B/1054/1	L Williams		102
B/1090/1	Karran Koihisto		102
B/1082/1	Dr Amjad		102
B/1173/1	V Baldwin		102
B/1098/1	Mrs Enid Andrews	Friends of brewery Fields	102
B/1077/1	Mary Parry		102
B/1195/1	Richard Williams		102
B/1168/1	Gaenor Price		102
B/1064/1	Mathew Bithell		102
B/1165/1	Caren Lewis		102
B/1171/1	J Prince		102
B/1076/1	T Carroll		102
B/1114/1	Andy Jones		102
B/1199/1	Jonathan Garratt		102
B/1119/1	Aldwyth Pari		102
B/1156/1	D Roberts		102
B/1144/1	J Owen		102
B/1186/1	Joan Roberts		102
B/1153/1	Mrs Margaret Thomas		102
B/1121/1	Mary Hughes		102
B/1182/1	Margaret Griffiths		102
B/1178/1	John Hughes		102
B/1198/1	Gwenan Owen		102
B/1175/1	Mair Edwards		102
B/1106/1	Mrs C Evans		102
B/1127/1	Prof & Mrs CR Baker		102
B/1107/1	Lowri Non Elis-Williams		102
B/1167/1	Avril Wayte		102

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B/1130/1	John O'Mahony		102
B/1162/1	Enid Griffith		102
B/1100/1	Elizabeth Andrews		102
B/1067/1	Bethan Dixon		102
B/1065/1	Tracy Bithell		102
B/1085/1	Andrew Leung		102
B/1101/1	Richard Andrews		102
B/1176/1	E Jones		102
B/1048/1	James & Gillian Goodman		102
B/1200/1	Kathryn Turner		102
B/1118/1	Aled Pari		102
B/1180/1	William Bromley		102
B/1179/1	Jean Hughes		102
B/1190/1	Nigel Thomas		102
B/1078/1	Sue King		102
B/1089/1	Liza Spaul		102
B/1197/1	Kevin Owen		102
B/1113/1	Angela Hardy		102
B/1080/1	Eryl Pritchard		102
B/1184/1	Dyfrig Jones		102
B/1193/1	D Williams		102

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/527/1	Eifion W.D. & Caryl D Hughes		102
B/859/1	James Thomas		102
B/844/18	CPRW		102
B/855/1	David Lewis		102
B/908/1	G.R. & I. Morgan		102
B/1110/1	Andrew Smith		102
B/1163/1	David Price		102
B/136/1	Kevin Read		102
B/137/1	Meryl Read		102
B/1136/1	Christine & Martin W Wenham		102

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/898/1	No Name		
B/900/1	J. Jones		
B/902/1	Hywel Parry		
B/1052/1	Frank Davies		
B/1050/1	Emma Broadhurst		
B/1047/1	E Griffiths		

B/1120/1	Bernard Campbell		
B/1177/1	Mrs Eleanor ol		
B/1287/1	Judy Matischok		
B/1308/1	No Name		
B/343/1	W.Speddy		
B/570/1	Mr & Mrs W.M. Jones		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1647/2001	Kathryn Birch		102
B/1280/2003	Meredudd ap Rhinallt		102
B/1641/2001	Hazel Savage		102
B/1290/2003	David Lloyd-Williams		102
B/1291/2003	David Lloyd-Williams		102
B/1429/2003	Charlie Lindenbaum		102
B/1139/2003	Nick Francis		102
B/1643/2001	CJ & R Whitaker		102
B/1312/2003	Erwain haf Rheinallt		102
B/356/2003	Ann E Williams		
B/785/2004	Jennifer Thomas		102
B/773/2050	Chris Wynne		102
B/1549/2001	Katie Dean		102

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/979/2005	Robert Jones		
B/756/2108	Environment Watch Wales & the Borders		
B/1369/2001	CA Wenham		

### Notes

- Objection B/1295/1 is responded to in LPA proof 102.
- Objection B/1289/1 is now unconditionally withdrawn.

### Main Issues

- The role of Bangor in the accommodation of new housing development.
- The nature conservation value of the site.

- The role of the land as a leisure resource.
- The effect of development on landscape quality.
- The effect of development on the safe and free flow of traffic.
- The capacity of educational, medical and social infrastructure.

## **Inspector's Considerations and Conclusions**

### *The role of Bangor in the accommodation of new housing development*

1. The LPA proposes, at DD stage, to allocate some 12.0ha of land at Eithinog/Brewery Fields for housing. The defined site would accommodate some 250 dwellings. Objectors note that this site, together with those at Pen y Ffridd, the rear of Ffordd Cynan and at Bryn Adda (the latter proposed at Pre-inquiry Change stage) would generate some 717 new dwellings. They take no account, however, of changes in the capacities of particular sites proposed by the LPA at Pre-inquiry Change stage. They argue that this is far more than is required to meet needs arising within the Penrhosgarnedd area of Bangor within which they would be situated. The UDP is not, however, a plan for the Penrhosgarnedd area alone or even for Bangor as a whole. It is a plan for the whole of the area of Gwynedd which lies outside the Snowdonia National Park. It is necessary to consider the housing needs of that wider area and the opportunities within it for the accommodation of development.

2. The need for the allocation of housing land is considered in the section of this report which relates to policy CH1. For the reasons I give there I agree with the LPA that there is a need for the allocation of land for some 1807 dwellings within the LPA area for the plan period.

3. PPW (paragraph 2.5.3) advises that LPAs should locate major generators of travel demand, such as housing, within existing urban areas or in other locations which are, or can be, well served by public transport or where employment, leisure, recreation and community facilities can be reached by walking or cycling. In my view Bangor is one of the few settlements which satisfy these conditions. Although some smaller settlements are served by public transport they cannot be said to be as well served as is Bangor. Some settlements, particularly the Urban and Local Centres have significant employment opportunities and public and commercial facilities, but cannot compete with Bangor in respect of the scope for a wide range of these to be accessed on foot or by cycle.

4. PPW (paragraphs 9.2.8 and 9.2.9) advises that, in identifying sites to be allocated for housing, LPAs should follow a search sequence starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good transport links. In deciding which sites to allocate LPAs should consider the availability and location of previously developed land, the location and accessibility of potential sites to jobs, shops and services by modes other than the car, the capacity of existing and potential infrastructure, the ability to build communities and the location of fragile habitats, species and landscapes.

5. Objectors refer to the development potential of previously developed land within Bangor at the St Mary's complex, the Bangor City football stadium, the railway goods yard and at Hirael Bay. The first of these has a very poor vehicular access with no possibility of improvement. The second has recently received



detailed planning permission for retail development. The third has received detailed planning permission for a new railway car park. Part of the fourth site is in a flood risk area and the remainder is poorly related to the built form of the City.

6. Bangor is pre-eminent amongst the major settlements of the plan area and this is reflected in its classification as a Sub-regional Centre. It has a wide range of shops, schools, community and sports facilities together with employment opportunities. It accommodates the University of Wales, Bangor, and the Gwynedd Hospital. All these facilities are available in a compact urban area which maximises accessibility by public transport and on foot. The city as a whole is a hub of an extensive bus network and is directly served by a major railway line. For these reasons it is the most sustainable location within the UDP area. It should be relied on to accommodate a major proportion of the requirement for allocated housing land. The lack of suitable previously developed land at Bangor makes it inevitable that attention should focus on green-field extensions to the built-up area to accommodate this.

7. Objectors refer to the potential impact of large scale housing development on the Welsh language. They fear that a significant proportion of the new housing would be occupied by non-Welsh speakers, leading to a reduction in the use of Welsh in the local community and to an erosion of the established social and cultural character as a result. PPW (paragraph 2.10.3) advises that LPAs should aim to provide for the broad distribution of housing development taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Appropriate UDP policies about the broad scale and location of new development could assist in that aim.

8. Virtually all communities in the UDP area are vulnerable to some extent to an erosion of the Welsh language and culture as a result of new housing development. It is clear, however, that housing allocations of the scale proposed are required within the UDP area as a whole. Bangor, due to its broad economic base and major institutions including the Gwynedd hospital and the University has for a long time attracted both Welsh and non-Welsh speakers. It is, in my view, the place within the UDP area where substantial residential development can be achieved with the least harm to the Welsh language and culture. Development elsewhere in the smaller settlements would have a more severe impact. In selecting Bangor as the location for the greater part of the necessary housing allocations the LPA is in conformity with PPW advice that policies relating to the broad scale and location of housing development can assist in the maintenance of Welsh language and culture.

9. Objectors argue that, rather than concentrate housing allocations at Bangor, this development should be distributed among the smaller settlements including the Urban Centres, Local Centres and Villages. These places are much less well served by employment, shops and services than Bangor. They lack public transport links of the quality that are available there. Such an approach would stimulate an increase in private car trips and promote an unsustainable pattern of development contrary to the advice of PPW. The opportunities for green-field urban extensions at Bangor are, furthermore, constrained by the principal physical features of the City. To the north west and north east expansion is prevented by the presence of the Menai Straits. To the south east it is constrained by a steep wooded ridge for the full length of the built-up area. Development beyond this would intrude into an

open rural landscape of rising land which forms the visual foreground to the mountains of Snowdonia. To the south west the expansion of Bangor is constrained by the extensive grounds of Vaynol Hall. I conclude that the only opportunities for the substantial residential development which, in order to achieve a sustainable pattern of settlement must take place at Bangor, is on the undeveloped green-field land to the west of the city centre in the vicinity of Penrhosgarnedd.

*The nature conservation value of the site*

10. Objectors argue that the whole of the area proposed for allocation at DD stage is of sufficient nature conservation value as to justify its protection from development. In response the LPA commissioned an independent ecological survey of the site in 2004. The first stage of the study concluded that the site supports a wide variety of interesting and important habitats which are a priority at the local, national and UK levels. These are lowland acid grassland, hedges and earth banks, wet woodland and neutral grassland. A number of areas were found to be significantly degraded in ecological terms and were considered to be of only moderate nature conservation value. The value of the vegetation and habitats was found to improve from east to west.

11. In response to the first stage of the study the LPA proposed, via NA 233 and 239, to exclude the western part of the site from the Development Boundary of Bangor and from the housing allocation. The allocated area would be reduced from 12.0ha to 3.28ha and the capacity from 250 to 82 dwellings. Acceptance of this proposed change would result in the retention of all the woodland and scrub areas, all the rush pasture, all the hedge and slate fences, 52% of the dry grassland and some 1171 metres of hedges and earth banks. Some 45% of the area that would be retained within the allocation comprises degraded and developed land.

12. The second stage of the survey involved a study of fungi, birds, bats, invertebrates and plants on the site at appropriate times of year. The overall conclusion drawn from the study was that, with the exception of a few relatively small and peripheral areas, the site is of sufficient biodiversity value that any major development would run contrary to a range of governmental and strategic commitments to the conservation of biological diversity. The neutral grassland and hedgerow mosaic is on a scale and of a quality which should probably be recognised through designation as a wildlife site or local nature reserve. The Council's Biodiversity Unit considered the report and recommended that the majority of the DD allocation be removed from proposed housing use for reasons of biodiversity importance.

13. The Countryside Council for Wales (CCW) considered the information provided by the two part study. It expressed the view that the site is of importance to local biodiversity and parts of it do support an assemblage of grassland fungi that may be considered by CCW as a potential Site of Special Scientific Interest (SSSI). CCW does not, however, believe that the area proposed to be retained as a housing allocation and within the Development Boundary as subject to NA 233 and NA 239 merits designation as an SSSI.

14. PPW (paragraph 9.2.9) advises that the benefits of guiding development to sustainable locations must be balanced against the effect of development on fragile habitats and species. In paragraph 5.5.1 this document advises that in the interests of achieving a sustainable pattern of development it is important to

balance conservation objectives with the wider economic needs of local businesses and communities. Paragraphs 5.5.2 and 5.5.3 anticipate that material considerations may outweigh potential adverse environmental effects and vice versa. The existence of bio-diversity interests does not, therefore, impose a veto on development. These are, instead, matters to be weighed against other interests.

15. Because of its confirmed value for nature conservation I agree with the objectors and the LPA that the western part of the site should be excluded from the Development Boundary and the housing allocation in accordance with these two proposed pre-inquiry changes. The CCW does not, however, support the inclusion of the remainder within a statutory nature conservation designation. PPW (paragraph 5.4.4) advises that non-statutory designations (perhaps as a local nature reserve or wildlife site, as suggested in the second part of the study) do not preclude appropriate socio-economic activities. I conclude that the need to take advantage of the opportunities available to minimise travel distances by private car to a wide range of facilities in the built-up area of Bangor and, conversely, to avoid the harm to a sustainable pattern of settlement that would arise if a significant number of necessary new dwellings were re-allocated to smaller less accessible settlements, outweighs the nature conservation value of the eastern part of the DD allocation. It justifies, in this particular case, the residential development of the part of the land which is proposed to be retained within the Development Boundary and allocated for housing by NA 233 and NA 239.

*The role of the land as a leisure resource*

16. Objectors argue that the site is a significant leisure and amenity resource. It is not, however, a public open space. Public enjoyment is confined to the use of the footpaths which cross the land. If my recommendations in relation to NA 233 and NA 239 are accepted, some 61% of the site area will be excluded from the housing allocation. The plan is to be read as a whole. Policy CH20 will ensure that the existing footpaths on the remainder of the land are safeguarded either in situ or by diverting them. The policy will ensure that the public's enjoyment of the footpaths is maintained as well as their linkage to the remainder of the footpath network. I conclude that any harm to the quality of the recreational resource in this area is sufficiently slight as to be easily outweighed by the benefits of the allocation, in its reduced form, in promoting a sustainable pattern of settlement.

*The effect of development on landscape quality*

17. The site of the proposed allocation is on land which rises above the Menai Straits. Objectors are concerned that housing development on all or part of it would be unacceptably intrusive, particularly when seen from Anglesey but also from close quarters. The character of the landscape along both sides of the Straits at this point is one of dwellings and other buildings glimpsed among and beyond woodland of varying density. The area of the reduced allocation proposed by the LPA is screened from the direction of the straits by the woodland of Coed Gorffwysfa which is protected by a Tree Preservation Order.

18. Glimpses of dwellings constructed on the site would be obtained from the direction of the straits beyond, and sometimes above, the trees. However, having regard to the existing mosaic of structures and tree cover this would not present an incongruous appearance. From closer vantage points dwellings on the site would be more clearly seen but in a context where built development is already the

dominant feature. The UDP is to be read as a whole. Policy B26 will require the provision of landscaping which is appropriate to the site and sufficient to protect the views from the sensitive landscape of the Anglesey AONB. I conclude that it is possible to develop the proposed reduced area of the allocation without causing unacceptable harm to landscape quality.

*The effect of development on the safe and free flow of traffic*

19. Objectors argue that if the proposed reduced housing allocation at Eithinog/Brewery Fields is developed in conjunction with the proposed allocations at Pen y Ffridd, Bryn Adda and the rear of Ffordd Cynon these would, in accordance with the Pre-inquiry Proposed Changes, accommodate a very substantial number of new dwellings. They express concern that the additional vehicular traffic generated by these would, at peak periods, overload the highway system in the Penrhos Road area.

20. The LPA, at the inquiry, confirmed that it had prepared a traffic model and used this to carry out a traffic study of the area which took account of the traffic generated by all the housing allocations. This had demonstrated that the local road system could cope with the expected extra traffic. It agreed that a copy of the Bangor City Traffic Model, and an account of the use made of it to assess the effect of the housing allocations on the Penrhos Road area, would be made available as inquiry documents. The objectors could then comment on them if they wished to do so. Subsequently the LPA confirmed that this traffic model was for internal use only within the highways department. It would not be made available to parties at the inquiry, including myself. I cannot, therefore, use it to judge the merits of the arguments of the objectors or of the LPA in respect of the traffic impact of the proposed housing allocations in the Penrhos Road area, either individually or collectively.

21. New dwellings in any location do generate demands for movement to gain access to employment, education, retail, leisure and community services. I have concluded, in the section of this report which relates to Policy CH1, that a total of some 1807 dwellings are required on allocated sites in the UDP area as a whole during the plan period. The housing allocations in the vicinity of Penrhos Road are within the built-up area of Bangor. Due to their proximity to the centre of the City the potential for the demand for movement to be satisfied by walking and public transport is, therefore, maximised to the greatest extent possible within the UDP area. The use of these sustainable transport modes has the potential to minimise the use of the private car and the effect of this on the local highway system.

22. Furthermore, the UDP is to be read as a whole. Measures to ensure that development will not overload the local highway network are presented in Policy CH31. This provides that development would be approved only if, among other things, the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from the new development or that new and adequate arrangements can be made which are consistent with the function of the road. The policy also provides for appropriate traffic calming measures to be provided in connection with any development which is likely to lead to a substantial increase in traffic. A substantial proportion of the traffic generated by the Pen y Ffridd site would, in any case, be routed, via the proposed link road, to Caernarfon Road rather than Penrhos Road. For these reasons I conclude that the land identified by

the LPA in the Penrhos Road area of Bangor can be allocated for housing without risk that unacceptable harm will result to the safe and free flow of traffic.

*The capacity of educational, medical and social infrastructure*

23. Objectors are concerned that the development of the housing allocations in the Penrhosgarnedd area of Bangor would overload existing educational, medical and social facilities. The LPA agrees that the existing educational infrastructure would be unable to cope with all the housing growth proposed, particularly in respect of primary education. The area is, at present, served by 3 primary schools, all of which are at capacity. The UDP is, however, to be read as a whole. Policy CH35 provides that when a new residential development is permitted, in circumstances where the educational needs of the children living in the new dwellings cannot be met at an existing school, planning conditions or obligations will be used to ensure that the developer provides or contributes towards the necessary facilities to meet those needs.

24. In a particular circumstance residential development might impose demands on medical and social infrastructure that cannot be met from existing facilities. For this reason the LPA proposes, via NAP 53, to change Policy CH35 to make reference to 'other community services' in addition to schools. This is, on the face of it, a necessary step in order that, in the interests of promoting a sustainable pattern of settlement, such facilities are available within reasonable distance of those who need them. However, because this Further Proposed Change has not been the subject of public consultation a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0642) that the DD be modified by the acceptance of NA 233 insofar as it relates to this particular housing allocation;**

**(REC.0643) that the DD be modified by the acceptance of NA 239;**

**(REC.0644) that no other modification be made to the DD in response to these objections.**

**PEN Y FFRIDD - BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA235; NA236

This Section is subject to Further Proposed Changes Nos: NAP35

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/994/1	Bennet Homes Ltd	Jan Tyrer	23
B/760/38	CCW		23
B/1004/1	Joanna Thomas		23

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/322/7	Morbaine Ltd		23
B/322/6	Morbaine Ltd		23
B/1030/7	Univeristy of Wales Bangor	Sian Kilner	23

**Supporters of Draft Deposit**

Ref No	Name of Supporter	Agent	Response Ref
B/1030/9	Univeristy of Wales Bangor	Sian Kilner	

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2106	Environment Watch Wales & the Borders		23
B/994/2005	Finneys Homes	Jan Tyrer	23

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/322/2010	Morbaine Ltd		

**Main Issues**

- The process by which housing allocations are identified.
- The effect of the allocation on landscape character.
- The priority to be given to the development of the site.
- The density of the residential development.

- The scope for the provision of a vehicular access.
- The detailed boundaries of the allocation.
- The merits of an alternative site.

## **Inspector's Considerations and Conclusions**

### *The process by which housing allocations are identified*

1. The DD proposes the allocation of this area of 10.65ha to provide some 260 dwellings. At Pre-inquiry Proposed Change stage the site area is said to be unaltered but the capacity is increased to some 300 dwellings. An objector argues that no strategy has been produced to establish the strengths and weaknesses (including biodiversity and landscape issues) of the sites where housing could be built in Bangor. These matters are, however, presented in the Background Paper 'The Classification of Settlements, Development Boundaries and the Selection of Allocated Sites in the Gwynedd Unitary Development Plan'. Biodiversity and landscape issues are identified as being among the matters to be taken into account and a structured approach to decision making is presented. I conclude that in the formulation of policies and proposals the LPA has systematically had regard to these interests of acknowledged importance. In relation to the biodiversity interest of this proposed allocation the Countryside Council for Wales has undertaken a phase 1 habitats survey and has not identified it as including habitats worthy of protection.

### *The effect of the allocation on landscape character*

2. The proposed allocation is situated in an elevated position on the south east side of the ridge along which runs the highway known as Penrhos Road. Development upon it would be visible from vantage points to the south and south east but always beyond a foreground of prominent commercial and residential development and against an immediate background of residential development and the visually significant buildings of the Gwynedd Hospital. It would be perceived as a consolidation of the built-up area rather than as an extension of it into the open countryside. For this reason I conclude that the land could be developed without unacceptable harm to the character and appearance of the locality.

### *The priority to be given to the development of the site*

3. Part of the proposed allocation was previously occupied by the buildings of a research establishment of Bangor University. The majority, however, is green-field land. An objector argues that priority should be given to the development of previously developed land. The allocation shares with that at Eithinog/Brewery Fields the very considerable advantages of a location within the built up area of Bangor. Its proximity to a wide range of services and facilities, and the scope for access to them to be gained by sustainable transport modes, leads me to conclude that in terms of its general location it is in conformity with the advice of PPW (paragraph 2.5.3). That guidance (in paragraph 9.2.8) advises that after the use of previously developed land the next most sustainable location for housing development is settlement extensions. Bangor lacks sufficient previously developed land to accommodate the housing allocations for which a need has been demonstrated. I conclude that, in selecting a predominantly green-field site well related to the built-up area of Bangor, the LPA has promoted a sustainable pattern of settlement to the greatest degree possible in the circumstances.

*The density of the residential development*

4. At DD stage the development of 260 dwellings on 10.65ha would result in a residential density of 24dph. At Pre-inquiry Proposed Change stage the development of some 300 dwellings on this same area would result in a density of 28dph. An objector argues that this latter density is too high to be accommodated in the locality. PPW (paragraph 9.2.12) advises that higher densities should be encouraged on easily accessible sites. Given its proximity to significant employment opportunities, retail, educational and leisure facilities by public transport this must be regarded as such a site.

*The scope for the provision of a vehicular access*

5. The proposed allocation is adjacent to the line of a proposed new road which is intended to connect Penrhos Road with Caernarfon Road. The LPA's Development Brief confirms that the development of the allocation depends on the provision of this new highway. The potential developer of the allocation confirms that the cost of the link road, together with that of land acquisition and site development costs, is such that the development of the whole 300 units as proposed at Pre-inquiry Proposed Change stage is required. A reduction from this number would make this development as a whole financially unviable. It is a matter of the whole 300 units or nothing.

6. Conditional planning permission was granted for the construction of the road on 10th December 1998. This has been periodically renewed and is still extant. Condition No 6 attached to that permission requires that 'the development hereby approved (i.e. the road) shall be completed in its entirety to the satisfaction of the Local Planning Authority before the roadway is brought into use for any purpose'. That condition has not been subsequently varied or removed. The potential developer of the proposed allocation confirms that the land required to accommodate the second phase of the link road (i.e. that between the site and Penrhos Road) has not yet been acquired by him but expresses confidence that this can be achieved in due course.

7. He argues that the County Engineer has accepted that the proposed allocation can be served by the construction of only the first phase of the link road which would connect this to Caernarfon Road. Reference is made to a letter from the County Surveyor (dated 5/12/2000) which is said to confirm this. That letter, however, says no more on this matter than to note that the link road, if constructed in phases, should commence from the Caernarfon Road end. It is entirely silent on whether the first phase would be sufficient to serve the development of the proposed allocation.

8. An objector argues that if the allocation was served by only the first phase of the link road, with its access only to Caernarfon Road, it would be limited to a capacity of only some 150 dwellings out of its potential total of 260 at DD stage and 300 at proposed Pre-inquiry Change stage. He contends that since the potential developer has argued that the whole capacity of the allocation is required if the development of the site is to be viable, the allocated area should be reduced very substantially to relate only to the part which has been previously developed, or it should be deleted as an allocation altogether.



9. The potential developer of the site agrees that if a single cul-de-sac residential collector road was to be proposed this would, indeed, have a capacity of 150 dwellings but argues that it would be a simple matter to create a loop road within the residential site with two junctions onto the link road, or to extend the link road into the site in the form of a higher standard distributor road and then serve the various plots by a mixture of loops and culs-de-sac to achieve whatever residential capacity is required.

10. The UDP is to be read as a whole. Policy CH31 provides that development proposals will be approved only if, among other things, provision is made for a safe vehicular access to the site. There is, at this stage, a degree of uncertainty as to whether a development scheme can be devised which will achieve this. However, the development plan period extends to 2016 which is a sufficient time for such a scheme to be devised. The DD (paragraph 1.1.38) confirms that the LPA has committed itself to a full review of the UDP every 5 years. The scope therefore exists for the LPA to review the development prospects of this allocation at intervals throughout the plan period and modify the housing allocation if this is justified. Having regard to this, and also to the very substantial contribution that can be made to a sustainable pattern of settlement by residential development in this locality, I conclude that the present uncertainty in respect of vehicular access should not stand in the way of the allocation of this land for housing.

11. The LPA's own Development Brief does confirm that the development of the Pen y Ffridd housing allocation is dependent on the proposed link road between Penrhos Road and Caernarfon Road. The allocation itself is one that the LPA promotes as necessary within the plan period in the interests of achieving a sustainable pattern of settlement. For this reason an objector argues that it is necessary to ensure that this alignment is protected from competing development by its inclusion as a safeguarded route under the terms of Policy CH24. That policy has been used to protect only public road projects. In the interests of consistency it should not be used to safeguard schemes which are not promoted by the LPA.

*The detailed boundaries of the allocation.*

12. The area of the allocation, as shown at DD stage, includes two existing dwellings. An objector argues that these should be excluded. The LPA agrees that it is inappropriate to include them in an area proposed for development and, via NA 236, proposes this. Since these dwellings are to remain in the longer term I conclude, in the interests of certainty, that they should be excluded from the allocation.

13. An objector argues that the boundary of the allocation should be extended to conform to the line of the proposed link road. The LPA concurs and proposes NA 235 to achieve this. I agree that this would resolve the uncertainty as to the future use of the small area of land involved. Contrary to the view of an objector that this area functions as a green wedge between settlements it is, in fact, a small open area within the wider built-up settlement of Bangor. I note, however, that the extent of this redefinition, as shown in the diagram which accompanies NA 235 has been incorrectly drawn. In the interests of clarity the allocation and the related Development Boundary should be redrawn on the south western edge of the proposed allocation so as to coincide with the nearest edge of the proposed link road at this point.

14. The LPA in response to an objector proposes, via NAP 35, to include part of the link road between the southern corner of the allocation and the roundabout junction adjacent to Caernarfon Road within the Development Boundary. No reason is, however, given for this Further Proposed Change.

15. I note that many existing highways lie outside the designated Development Boundaries. I note, furthermore, that the plan drawn by the LPA which seeks to illustrate this Further Proposed Change has been inaccurately prepared and does not conform to the alignment of the link road as subject to the grant of planning permission.

16. The DD (paragraph 1.3.46) confirms that the Development Boundaries are intended to restrict development to sites that are within settlements so as to regulate development and protect the countryside. The link road already has planning permission and its inclusion within the Development Boundary is not, therefore, necessary to secure that it is regarded as an area where it would be appropriate to permit development for that purpose. For these reasons I conclude that it is not appropriate or necessary to modify the plan in accordance with NAP 35.

*The merits of an alternative site*

17. An objector argues that, as an alternative to the development of all or part of the land at Pen y Ffridd, some 2.2ha of land to the rear of Maes y Coed and Ffordd Gwyndy, Bangor, should be included within the Development Boundary of the Sub-regional Centre and be allocated for the development of 50 dwellings. I agree with the objector that the site is in a sustainable location, within walking distance of major employers, a wide range of educational provision and has a frequent public transport link to the transport hub of Bangor City Centre. It must, for these reasons, be regarded as in a sustainable location. Due to the presence of major woodland along its northern edge, development here could be accommodated without a significant impact on the local landscape.

18. The LPA agrees that it is likely that a safe vehicular access can be provided to the site. It refers to a desk exercise which has indicated that this land may be of importance in terms of biodiversity, but the limited information and generalised arguments that have been advanced do not allow me to give this factor conclusive weight.

19. However, for the reasons I give in the section of this report which relates to Policy CH1, I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0645) that the DD be modified by the acceptance of NA 235 subject to the boundary of the Pen y Ffridd housing allocation being re-aligned at the south western edge of the site to coincide with the nearest edge of the link road for which planning permission Ref: C98A/0111/11/LL was granted on 10<sup>th</sup> December 1998;**

**(REC.0646) that the DD be modified by the acceptance of NA 236;**

**(REC.0647) that no other modification be made to the DD in response to these objections.**

## REAR OF FFORDD CYNAN - BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA238

This Section is subject to Further Proposed Changes Nos: NAP36

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1324/1	Dewi Jones		39
B/1321/1	Barry Davies		39
B/1336/1	Ian Cook		39
B/324/3	Bangor City Council		39
B/1330/1	Mr C Shea	John Williams	39
B/730/1	Olaf & Helen Davies		39
B/143/1	Arthur Griffith		39
B/760/37	CCW		39
B/250/1	Pentir Community Council		39
B/837/1	A. Graham		39
B/1209/1	Dr D Devaraj		39
B/1325/1	David Davies		39

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/36	CPRW		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1387/2001	Dr Bestoun Mawlood		39
B/250/2007	Pentir Community Council		39
B/911/2024	WDA		39
B/756/2107	Environment Watch Wales & the Borders		39
B/1603/2001	David James		39
B/1599/2001	RA Walters		39
B/1498/2001	Bleddyn Jones		39

## Main Issues

- The process by which housing allocations are identified.
- The role of Bangor in accommodating new housing development.
- The priority to be given to the development of the site.
- The effect of the allocation on the safe and free flow of traffic.
- The appropriate density of the development.
- The proportion of the development to be for affordable homes.
- The effect of the allocation on landscape character.
- The availability of essential infrastructure.
- The effect of the allocation on residential amenity.
- The merits of extending the area and capacity of the allocation.

## Inspector's Considerations and Conclusions

### *The process by which housing allocations are identified*

1. The DD proposes the allocation of an area of 7.8ha to the rear of Ffordd Cynan, Bangor, to accommodate some 150 dwellings. At Pre-inquiry Change stage, via NA 238, the LPA proposes, in response to an objection, to extend the Development Boundary to allow the proposed housing allocation to be increased to 9.0ha to accommodate some 190 dwellings. A Further Proposed Change, NAP 36, proposes to further extend the Development Boundary and the housing allocation. The LPA's proof No 39 (paragraph 4.11) confirms that the purpose of the Further Proposed Change is to allow the provision of a new school to serve the Penrhosgarnedd area as a whole.

2. An objector argues that no strategy has been produced to establish the strengths and weaknesses (including biodiversity and landscape issues) of the sites where housing could be built at Bangor. I deal with this matter in the section of this report which relates to the proposed housing allocation at Pen y Ffridd, Bangor.

3. An objector notes that bats are to be seen flying over the site. The UDP must be read as a whole. Policy B19 protects species and their habitats that are of international, national and local importance.

### *The role of Bangor in the accommodation of new housing development*

4. An objector argues that housing development on the scale proposed is not needed to meet the needs of the residents of Penrhosgarnedd. I deal with this matter in the section of this report which relates to the proposed housing allocation at Eithinog/Brewery Fields, Bangor.

### *The priority to be given to the development of the site*

5. The area of the proposed allocation is entirely green-field land. An objector argues that priority should be given to the development of previously developed land. The allocation shares with those at Eithinog/Brewery Fields and Pen y Ffridd the very considerable advantages of a location within the built-up area of Bangor. Its proximity to a wide range of services and facilities, and the scope for access to these to be gained by sustainable transport modes, leads me to conclude that, in

terms of its general location, it is in conformity with the advice of PPW (paragraph 2.5.3). That guidance (in paragraph 9.2.8) advises that after the use of previously developed land the next most sustainable location for housing development is settlement extensions. Bangor lacks sufficient previously developed land to accommodate the housing allocations for which a need has been demonstrated. I conclude that, in selecting a green-field site very closely integrated with the built-up area of Bangor, the LPA has promoted a sustainable pattern of settlement to the greatest degree possible in the circumstances.

*The effect of the allocation on the safe and free flow of traffic*

6. Objectors refer to the concentration of public facilities along Penrhos Road. These include schools, a major office development and the Gwynedd Hospital. That road is, furthermore, a principal approach road to the city centre of Bangor. These factors combine to subject that highway to traffic congestion at peak periods. Objectors are concerned that additional traffic will reinforce that congestion and generate additional noise and fumes. Several objectors advocate that the development should gain access from the proposed link road between Penrhos Road and Caernarfon Road.

7. In the section of this report which relates to the proposed housing allocation at Eithiniog/Brewery Fields, I deal with the factors which relate to the combined effect of that allocation (together with those at Pen y Ffridd, Bryn Adda and at the rear of Ffordd Cynan) upon the local highway network. In addition to the considerations dealt with there it is clear that the proposed link road between Penrhos Road and Caernarfon Road is too distant to serve the proposed allocation at the rear of Ffordd Cynan.

8. Objectors express concern that the existing highways of Ffordd Cynan and Ffordd Crwys are not suitable to serve the proposed allocation. The LPA agrees and proposes that the vehicular access be provided via a new roundabout junction with Penrhos Road. This would, in addition to serving the proposed allocation, provide the scope for the provision of a second access to the adjacent Gwynedd Hospital, thereby reducing the traffic flow via the existing hospital access and along part of Penrhos Road. In any case, the UDP is to be read as a whole. Policy CH26 provides that proposals for development that would substantially increase the number of journeys made by private vehicles will be refused if they do not include measures to reduce the environmental impact as part of a traffic assessment and/or a travel plan. Policy CH31 provides that development proposals will be approved only if, among other things, provision is made for vehicular access which is safe and in keeping with the local surroundings.

9. Furthermore, the existing road network must be of a sufficient standard to deal with the flow of traffic that is likely to result from the development, otherwise new and adequate improvements must be made which are consistent with the function of the road. For these reasons I conclude that the UDP, as a whole, secures that particular schemes of development will not be approved unless no harm would result to the safe and free flow of traffic or the local environment.

10. An objector expresses concern that development would interfere with a public right of way across the land. The plan must be read as a whole. Policy CH20 protects the existing public rights of way by providing for any proposal that would

lead to the loss of such a facility to be refused unless an acceptable alternative route is provided.

*The appropriate density of the development*

11. An objector argues that the UDP envisages the over-development of this land because the proposed density of the housing development is too high. At DD stage the density would be 19dph. At Pre-inquiry Change stage it would be 21dph. Both of these are markedly low densities. PPW (paragraph 9.2.12) advises that higher densities should be encouraged on easily accessible sites. The proposed allocation to the rear of Ffordd Cynan is immediately adjacent to the built-up area of Bangor. Access can be gained by public transport or cycling to a wide range of employment opportunities, education services, retail and leisure facilities. It must be regarded as an easily accessible site on which higher density development is appropriate.

*The proportion of the development to be for affordable housing*

12. Objectors variously argue that too many or too few affordable houses are proposed by the LPA for this site. At DD stage the UDP provided for some 25% of the dwellings to be of this type. At Pre-inquiry Proposed Change stage this was proposed to be increased to 35%. These are intended to be indicative targets. The LPA, via NA 157, proposes that it will discuss these indicative targets where relevant and negotiate with developers to include an element of affordable housing on allocated sites. This approach is in conformity with the advice of PPW (paragraph 9.2.14) that when it is considering a planning application for the residential development of a site an LPA, if it considers that the proposal does not contribute sufficiently towards the creation of mixed communities, should negotiate a revision of the mix of housing or may refuse the application.

13. Objectors are concerned that affordable housing, by its design and layout, could impair the quality of the development of the site. The relevant Development Brief provides that affordable housing should not be conspicuous by its design. It should not be concentrated in one part of the development. It would not, therefore, have an adverse impact on the visual character of the scheme.

*The effect of the allocation on landscape character*

14. Objectors refer to the location of the proposed allocation at the edge of the built-up area. They express concern that it would result in a discordant urban extension into the open countryside. Due to the location of the site on the upper slopes of a ridge, the houses erected upon it would be visible from vantage points to the south and south east but always against an immediate background of residential development and in the same context as the adjacent and visually significant buildings of the Gwynedd Hospital. It would be perceived as a consolidation of the built-up area rather than as an incongruous intrusion into the rural landscape. For this reason I conclude that the land could be developed without unacceptable harm to the integrity of the rural setting of Bangor.

*The availability of essential infrastructure*

15. Objectors express concern that development of this site would overload the local schools and the sewerage system. An objector emphasises that the existing

sewers serving Ffordd Cynan and Ffordd Crwys would not be available because they are not adopted. The LPA agrees that the local schools are at capacity and proposes to make the necessary provision to meet the additional school needs arising from this and the other proposed housing allocations in the Penrhosgarnedd area by extending this site. It has proposed NAP 36 with the express intention that this extra land would be used for the development of a new school. I conclude that adoption of this Further Proposed Change would satisfy the objectors' concerns in this respect. This further change has not, however, been the subject of public consultation and a full debate on its merits has not been possible. If the LPA considers this change to be appropriate it should pursue it at modification stage.

16. In respect of sewerage services the UDP is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. Specific reference is made in that policy to the sewerage system.

17. An objector argues that radon gas is to be found in dangerous concentrations in the Penrhosgarnedd area. This is a matter which can be dealt with by specific design features. It is a matter for the building control service and would be considered when a specific planning application is determined. An objector expresses concerns that overhead electrical cables can cause health problems but none cross the site.

*The effect of the allocation on residential amenity*

18. Objectors express concern that housing development on this proposed allocation could reduce the private enjoyment of the existing dwellings which abut the site. The plan must be read as a whole. Policy B22 provides that development proposals that have an unacceptable impact on residential amenities, including the reasonable privacy of nearby properties, will be refused.

*The merits of extending the area and capacity of the allocation*

19. My conclusions in relation to the preceding issues relate both to the site and its capacity proposed at DD stage and at Pre-inquiry Change stage. These, therefore, support the extension of the allocation as proposed by NA 238.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0648) that the DD be modified by acceptance of NA 238;**

**(REC.0649) that no other modification be made to the DD in response to these objections.**



## BRYN ADDA - BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA237

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/302/1	Goronwy Owen		28
B/965/5	Dalton Warner Davis		28

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/979/2004	Robert F Jones	Gareth White Partnership	28
B/969/2017	Welsh Water (Conditionally withdrawn)		28
B/994/2004	Bennet Homes Ltd	Jan Tyrer	23

### Supporters of Pre-Inquiry Proposed Changes

Ref No	Name	Agent	Response Ref
B/1423/2001	Watkin Jones & Son Ltd		

### Main Issues

- The promotion of a sustainable pattern of settlement.
- The scope for the provision of a vehicular access.
- The availability of essential infrastructure.

### Inspector's Considerations and Conclusions

#### *The promotion of a sustainable pattern of settlement*

1. The LPA, at Pre-inquiry Change stage, via NA 237, proposes to extend the Development Boundary of Bangor to include an area of 1.93ha to be allocated for housing development. This would accommodate some 57 dwellings. An objector argues that the allocation of this land, together with the adjacent Pen y Ffridd site is contrary to the advice of PPW (paragraphs 9.1.2 and 2.4.2) and would fail to promote a sustainable pattern of settlement.

2. PPW (paragraph 9.1.2) advises that LPAs should promote sustainable residential environments while avoiding large housing areas of monotonous character. Together with the adjacent Pen y Ffridd site that at Bryn Adda would constitute a large area of new housing, but its design and layout would be a matter to be decided at planning application stage. Attention given to these factors can produce housing developments which are of varied character. There is nothing at the plan-making stage to indicate that this housing development must, necessarily, be monotonous.

3. PPW (paragraph 2.4.2) advises that an effective way to achieve regeneration is to foster integrated communities within the existing settlement pattern by promoting mixed use development. The Bryn Adda site is too small for such a mixture of uses. However its location, together with that of the adjacent Pen y Ffridd site within the built-up area of Bangor near to the education and health facilities on Penrhos Road, and the employment and retail facilities on Caernarfon Road will reinforce the juxtaposition of different land uses that the objector advocates.

*The scope for the provision of a vehicular access*

4. An objector argues that the site could not gain vehicular access via the existing residential development of Bryn Adda. The LPA concurs but argues that it could gain this via the access which is proposed to serve the adjacent Pen y Ffridd site. I consider the merits of that proposed access in the section of this report which relates to that latter site. I note the uncertainties which relate to it but have concluded that there is sufficient time available within the plan period for these to be resolved.

5. I note, furthermore, that the scope for the proposed link road between Penrhos Road and Caernarfon Road to serve some 57 new dwellings at Bryn Adda in addition to the 300 at Pen y Ffridd is likely to enhance the prospect that the provision of that new highway link will be financially viable. As with the Pen y Ffridd site, the commitment of the LPA to a comprehensive review of the plan at 5 year intervals will ensure that the viability of both related allocations will be periodically considered. At this stage the benefits of the proposed Bryn Adda allocation in reinforcing the housing land resource in a high sustainable location leads to my conclusion that it should be allocated for housing.

*The availability of essential infrastructure*

6. An objector expresses concern that development of the Bryn Adda land would overload the local sewerage system. The plan is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure. Specific reference is made in that policy to the sewerage system.

## **RECOMMENDATIONS**

### **I recommend:**

**(REC.0650) that the DD be modified by the acceptance of NA 237 and the related NA 233 insofar as it relates to the Bryn Adda site;**

**(REC.0651) that no other modification be made to the DD in response to these objections.**

## NEAR MAES COETMOR, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA243

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/759/1	Bethesda Community Council		52

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1332/1	J LI W Williams (petition)		52

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/952/32	RCH Douglas Pennant	Guy D Evans	

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2085	CPRW		52
B/952/2042	RCH Douglas Pennant	Guy D Evans	52

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/756/2109	Environment Watch Wales & the Borders		

### Note

- Objections B/952/23 and B/952/30 are dealt with in this section of this report.

### Main Issues

- The role of Bethesda in meeting the need for housing land.

- The effect of development on the safe and free flow of traffic.
- The availability of essential infrastructure.
- The effect of development on the amenities of adjacent residents.
- The extent of the allocation.
- The merits of alternative sites.

## **Inspector's Considerations and Conclusions**

### *The role of Bethesda in meeting need for housing land*

1. The DD proposes to allocate 0.59ha of land near Maes Coetmor, Bethesda, for housing. The site would support some 49 dwellings of which 10% are proposed to be affordable homes. An objector argues that a priority for Bethesda is the provision of homes to meet local demand either through houses to rent or for sale at a reasonable price. The price of the houses to be built for sale on the site is a matter for market forces to determine. PPW (paragraph 9.2.4) clarifies that normally there should be no restriction on the occupancy of market housing. No robust evidence has been presented to demonstrate that a restriction of occupancy to local people is appropriate in this case. The development would, by delivering some 5 affordable dwellings, contribute to meeting the housing needs of local residents who cannot afford to buy in the market.

### *The effect of development on the safe and free flow of traffic*

2. Objectors argue that the adjacent Bryn Bella crossroads is dangerous and note that the highways which serve the site do not have pavements. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from the new development, or that new and adequate improvements can be made which are consistent with the function of the road. Policy CH32 reinforces this by providing that development proposals will be refused if they create an unacceptable increase in traffic on rural lanes where walkers are expected to be the main users. For these reasons I conclude that the UDP, as a whole, provides a framework which will secure that no harm to the safe and free flow of pedestrian and vehicular traffic will arise as a result of the allocation of this site.

### *The availability of essential infrastructure*

3. Objectors express concern that the development might exacerbate drainage problems and that surface water might overflow from the site into their properties. The plan is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to, among other things, dispose of surface water and sewage. I conclude that the UDP, as a whole, provides a framework which will secure that no harm to the living conditions of adjacent residents in respect of the inundation of their land will arise from the allocation of this site.

### *The effect of development on the amenities of adjacent residents*

4. Objectors note the difference in levels between their homes on Bangor Road and the site of the proposed allocation. The latter rises above the former and the objectors are concerned that the residential development of this land would reduce

the private enjoyment of their homes. The plan is to be read as a whole. Policy B22 provides that proposals which would have an unacceptable impact on the amenities of local communities, including the reasonable privacy of the occupiers of nearby properties, will be refused. For this reason I conclude that the UDP as a whole provides a framework which will secure that no harm to the privacy of adjacent occupiers will arise as a result of the allocation of this site.

*The extent of the allocation*

5. An objector argues that this proposed allocation should be enlarged to include the northern half of an area of land which is proposed to be allocated as 'protected open space' and which lies immediately to the south of it. This land is currently in use as grazing land. Its development would, it is argued, provide up to 10 additional dwellings.

6. For the reasons I give in the section of this report which relates to policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, there should be no increase in the housing land allocations in Local Centres, such as Bethesda, because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land take, I conclude that this proposed additional area of land should not be allocated for housing development.

*The merits of alternative sites*

7. At Pre-inquiry Proposed Change stage the LPA proposes, via NA 243, to exclude this site from the Development Boundary of Bethesda and delete it from the list of housing allocations. It gives as the reason for this that there are other sites in the DCA which are better suited to satisfying the need for housing. I note that the Development Brief for the proposed allocation Near to Maes Coetmor, prepared as recently as June 2004, confirms that this site is well integrated with the existing pattern of settlement, is within reasonable walking distance of the retail, employment and educational facilities of Bethesda town centre and is on a bus route. I agree with this assessment and note that, in these terms, this site compares favourably with the alternatives proposed by the LPA.

8. At the relevant inquiry session the LPA confirmed that these 'better sites' were those near Plas Ffrancon and near Cae Ifan Gymro, Bethesda. These are proposed to be included within the Development Boundary of Bethesda and allocated for housing by NA 244 and NA 245 respectively. For the reasons I give in the sections of this report which relate to those sites I conclude that they are both unsuitable for allocation.

9. For the reasons I give in relation to my consideration of the objections to the proposed allocation Near Maes Coetmor, Bethesda, and having regard to the conclusions of the Development Brief which continue to be valid, I conclude that this latter site should be retained within the Development Boundary and as a housing allocation. NA 243 should not, therefore, be accepted.

**RECOMMENDATION**

**I recommend:**

**(REC.0652) that no modification be made to the DD in response to these objections and, in particular, that NA 243 be not accepted.**

## NEAR PLAS FFRANCON - BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA244

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2086	CPRW		52
B/756/2110	Environment Watch Wales & the Borders		52
B/1644/2001	Councillor Ann Williams		52
B/1645/2001	A.W. Rowlands		52

### Supporters of Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/952/2037	RCH Douglas Pennant	Guy D Evans – Carter Jonas	

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2018	Welsh Water		52

### Main Issues

- The effect on the prospects for achieving a sustainable pattern of settlement.
- The effect on the character and appearance of the locality.
- The number of affordable homes to be provided.

### Inspector's Considerations and Conclusions

*The effect on the prospects for achieving a sustainable pattern of settlement*

1. The LPA, at Pre-inquiry Proposed Change stage proposes, via NA 244, the inclusion within the Development Boundary of Bethesda of land near Plas Ffrancon and its allocation for housing. This land has an area of 1.7ha and would have a capacity of 44 dwellings, some 25% of which would be affordable homes. An objector argues that, due to its location beyond the edge of the consolidated built-up area of Bethesda, it would stimulate extra vehicular traffic in order that its residents could gain access to the facilities and services of Bethesda town centre. This site is proposed by the LPA for allocation as a replacement for that proposed to be allocated at DD stage Near to Maes Coetmor. That site was considered by the



LPA's Development Brief to be within reasonable walking distance of a wide range of town centre facilities. The proposed replacement near Plas Ffrancon most certainly would not be. I conclude that, because of its relatively remote location in relation to essential services, development of this site would stimulate a disproportionate number of trips by private car. It would, thereby, promote an unsustainable pattern of settlement.

*The effect on the character and appearance of the locality*

2. The proposed allocation is within a wide belt of open countryside which separates the consolidated built-up area of Bethesda from a ribbon of residential development along the south side of Ffordd Hen Barc. This belt penetrates into the built-up area of Bethesda at this point and provides an important element of the rural setting of this small town, giving it a spacious aspect along much of its north western edge. The proposed housing allocation would cut off a significant part of this belt of open land, leaving it as an isolated area surrounded by development. Even though the proposed allocation itself would occupy a relatively small area it would, for that reason, have a disproportionate effect in enlarging the town and eroding its rural setting. For this reason it would have an unacceptably harmful effect on the character and appearance of Bethesda.

*The number of affordable houses to be provided*

3. The site would, in accordance with NA 244, generate about 11 affordable homes. Objectors argue that many more are needed. The 11 dwellings referred to are presented in the proposed changed plan as an indicative target. In accordance with the advice of PPW (paragraph 9.2.14) if, having regard to all material considerations, the LPA considers that a proposed development does not contribute sufficiently towards the objective of creating mixed communities then it must negotiate a revision of the mix of housing or may refuse the application. The precise number of affordable homes to be built on the site is, therefore, a matter to be determined at the planning application stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0653) that the DD be not modified in accordance with NA 244;**

**(REC.0654) that no other modification be made to the DD in response to these objections.**

## NEAR CAE IFAN GYMRO - BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA245

This Section is subject to Further Proposed Changes Nos: NAP20; NAP21

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2111	Environment Watch Wales & the Borders		
B/1501/2001	S. Whiteside, B. Prangnell, M. Barritt		52
B/952/2043	RCH Douglas Pennant	Guy D Evans (Carter Jonas)	52
B/1639/2001	Emlyn Williams		52
B/1644/2003	Councillor Ann Williams		52
B/1645/2003	A.W.Rowlands		52
B/1680/2001	Cledwyn Davies		52

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2019	Welsh Water		

### Main Issues

- The availability of the site for housing development.
- The merits of an alternative site.

### Inspector's Considerations and Conclusions

#### *The availability of the site for housing development*

1. The LPA, at Pre-inquiry Proposed Change stage proposes, via NA 245, the inclusion within the Development Boundary of land near Cae Ifan Gymro, Bethesda, and its allocation for housing. This land has an area of 1.54ha and would have a capacity of 34 dwellings, some 30% of which would be affordable homes. Following this the landowner confirmed that he would not make the land available for development during the plan period. As a consequence the LPA has, via Further Proposed Change NAP 20, proposed not to allocate this land for housing. I conclude

that there is no reasonable prospect that this site will contribute to the housing land resource during the plan period.

*The merits of an alternative site*

2. The LPA has proposed a Further Proposed Change (NAP 21) which would replace the land near Cae Ifan Gymro, with a site opposite Maes Bleddyn in the nearby Village of Rachub. This would accommodate some 34 houses. The LPA does not provide, via NAP 21 or in its proof of evidence, any substantial information upon the merits of this proposed housing allocation. Because this Further Proposed Change has not been the subject of public consultation I do not have the benefit of the views of interested persons. For these reasons, in accordance with the advice of 'Unitary Development Plans – A Guide to Procedure' (paragraph 1.24), I conclude that a fully balanced debate has not been possible in relation to this site. I am, therefore, unable to make a firm recommendation on NAP 21. If the LPA considers this to be appropriate it should pursue it at modification stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0655) that the DD be not modified in accordance with NA 245;**

**(REC.0656) that no other modification be made to the DD in response to these objections.**

## NEAR PENTWMPATH - LLANDYGAI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA256

### Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/952/2039		RCH Douglas Pennant		595
B/756/2119		Environment Watch Wales & the Borders		110
B/1660/2001		Marilyn Owen		595
B/969/2020		Welsh Water (Conditionally Withdrawn)		595
B/1659/2003		S J O'Grady		595

#### Note

- B/952/2039 is a representation in support of NA 256.

#### Main Issues

- The effect of the proposal on the prospects for achieving a sustainable pattern of settlement.
- The availability of essential infrastructure.
- The effect of development on the safe and free flow of traffic.
- The effect of development on the living conditions of adjacent residents.

#### Inspector's Considerations and Conclusions

*The effect of the proposal on the prospects for achieving a sustainable pattern of settlement*

1. The DD classifies Llandygai as a Rural Village. Proposed Pre-inquiry Changes NA 147 and NA 255 propose that it be re-classified as a Village with a related Development Boundary. NA 256 and NA 233 propose to allocate 0.61ha of land near Pentwmpath for housing with a capacity of 15 dwellings of which 35% would be affordable homes.

2. An objector refers to the lack of supporting facilities at Llandygai. In particular there are no shops, public services or leisure opportunities. The site is, however, within easy walking distance of the substantial Llandygai Industrial Estate and the extensive Bryn Cegin Employment Park which is under construction. The village is on a bus route with a regular bus service to Bangor city centre (which is

only 2.5km distant) and other principal settlements along the North Wales coast. Notwithstanding the lack of other facilities the scope to gain access on foot to a wide range of employment opportunities leads me to conclude that this is a sustainable location for a limited number of houses.

*The availability of essential infrastructure*

3. An objector notes that the school at Llandygai is at capacity and that the proposed site of the allocation, itself, is within an area of flood risk and has poor surface water drainage. There is said to be no obvious route by which surface water could discharge to the local water course nor is there spare capacity at the local sewage works.

4. The LPA confirms that although nearby areas do lie within a C2 flood risk zone the objection site does not lie within an area that is at risk from flooding. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. This specifically includes the means of disposing of surface water and sewage. Turning now to concerns regarding the capacity of the local school, Policy CH35 provides that when a new residential development is permitted, in circumstances where the educational needs of children living in the new dwellings cannot be met at an existing school, planning conditions or obligations will be used to secure that the developer provides or contributes towards the necessary facilities.

*The effect of development on the safe and free flow of traffic*

5. An objector expresses concern that it will be difficult to secure a safe vehicular access to the site. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access to the site.

*The effect of development on the living conditions of adjacent residents*

6. An objector expresses concern that because his house lies adjacent to the proposed allocation, and at a lower level, the construction of dwellings would reduce the light received by it. The plan must be read as a whole. Policy B22 provides that proposals which would have an unacceptable impact on the amenities of local communities will be refused. I conclude that the UDP, read as a whole, provides the framework within which this proposed allocation can be developed for residential purposes without demonstrable harm to interests of acknowledged importance.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0657) that the DD be modified by the acceptance of NA 256;**

**(REC.0658) that the DD be modified by the acceptance of NA 233 insofar as it relates to this particular housing allocation;**

**(REC.0659) that no other modification be made to the DD in response to these objections.**

**REAR OF PUB AND SETTLEMENT STATUS - PENTIR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA258

This Section is subject to Further Proposed Changes Nos: NAP 23; 24

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/568/1	P Pugh	Watkin Jones Group	194

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1389/2003	Dr Ruth Ann Sharrock		194
B/1385/2003	Mr & Mrs Cutler		194
B/1375/2003	Cynrig Ellis Hughes		194
B/1384/2001	Mr Colin Mottler		194
B/1361/2003	Harry Hambleton		194
B/250/2009	Pentir Community Council		194
B/1611/2003	Mrs Sharon Edwards		194
B/1596/2001	Wyn Griffiths		194
B/1587/2003	Glynne Thomas & Averill Thomas		194
B/1607/2003	Pat & Dennis Cooke		194
B/1662/2003	Audrey McSorley		194
B/1464/2001	Jên Dafydd		194
B/1648/2003	Jennifer A Hook		194
B/1392/2001	Linda Sammonds		194
B/1666/2003	Brian Bollington		194
B/1668/2003	Janet Rees		194
B/1471/2001	Einion Dafydd		194
B/1374/2001	Dr D Wyn James		194

B/1382/2003	Andrew William Sharrock		194
B/1431/2003	John Cain		194
B/1388/2001	Stephen Miles		194
B/1376/2001	Dr C Lamers		194
B/1427/2003	I Mirrlees & W.C. Jones		194
B/1434/2001	Betty Thomas		194
B/1476/2001	Mark Lear		194
B/1469/2003	AJ Collingwood-Hook		194
B/1442/2003	Ken Chandler		194
B/1449/2001	Robert Thomas		194
B/1435/2003	Robert Huw Thomas		194
B/756/2121	Environment Watch Wales & the Borders		110
B/1477/2001	June Lear		194
B/1479/2003	John Caradog Rees		194
B/1588/2001	Cynghorydd Anwen Thomas		194

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/969/2021	Welsh Water		

### Note

- In addition to the above the following objections are dealt with here: B/1374/2003, B/1382/2001, B/1389/2001, B/1464/2003, B/1471/2003 and B/1479/2001.

### Main Issues

- The effect of the proposal on the prospects for achieving a sustainable pattern of settlement.
- The effect of the proposal on the character of the settlement.

### Inspector's Considerations and Conclusions

*The effect of the proposal on the prospects for achieving a sustainable pattern of settlement*

1. Pentir is classified in the DD as a Rural Village. An objector argues that the settlement is on a bus route and has a public house, a Church and a cemetery. A primary school is some 1km distant at Rhiwlas. He notes that there is a strong need for new housing in the village. This would support local businesses and secure that the local school remained open. The LPA, at Pre-inquiry Proposed Change

stage agreed and proposed, via NA 257, that Pentir be classed as a Village and, via NA 258, that some 0.44ha of land to the rear of the Vaynol Arms public house be allocated to allow the development of 8 houses, 35% of which would be affordable dwellings.

2. The settlement of Pentir contains only some 18 dwellings. It is little more than a sporadic development of houses in the open countryside. Its residents who have objected to the Pre-inquiry Proposed Change describe the settlement as a quiet rural hamlet. The LPA has decided to classify as Villages those small settlements which have three or more of certain specified services. At the time of the inquiry Pentir had only two such facilities, a public house and a public transport service. There were no other local businesses to be supported by any additional houses.

3. It is necessary to have regard to the advice of PPW (paragraph 9.2.9) that, in deciding which sites to allocate for housing, LPAs should consider their accessibility to jobs, shops and services by modes other than the car. PPW (paragraph 2.5.4) is emphatic that sites which are unlikely to be well served by public transport, walking or cycling should either not be allocated for development or be allocated for uses which are not travel intensive.

4. Due to its almost complete lack of facilities and services the residents of Pentir are, at present, dependent on trips to larger settlements for all of their employment, education, shopping and health service needs and almost all of their leisure activities. Pentir is on a bus route, but the low frequency of this means that the settlement cannot be regarded as being well served. Due to the lack of facilities in Pentir the range of destinations required to be accessed on a day to day basis will undoubtedly be very great. It will result in the bus service being too inflexible in terms of places served and times of operation to meet the full range of needs. As a consequence the existing residents are likely to rely on the private car. Additional residential development would simply reinforce this. I conclude that the classification of Pentir as a Village would undermine the promotion of a sustainable pattern of settlement. I note that this conclusion coincides with the objective of Further Proposed Change NAP 23.

*The effect of the proposal on the character of the settlement*

5. PPW (paragraph 9.2.21) advises that many parts of the countryside have isolated groups of dwellings such as that at Pentir. Minor extensions to such groups may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and accessibility to main towns and villages. A development of 8 new dwellings in a settlement which contains only 18 at present could not be considered a minor extension. It would be a very significant development in local terms. I conclude that a comprehensive development on this scale in such a small settlement would contrast markedly with the sporadic piecemeal growth of Pentir. It would unacceptably erode its distinctly rural character. I note that this conclusion coincides with the objective of NAP 24.



**RECOMMENDATION**

**I recommend:**

**(REC.0660) that no modification be made to the DD in response to these objections and, in particular, that NA 257 and NA 258 be not accepted.**

## NEAR LLWYN BLEDDYN - RACHUB

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/356/1	Ann E Williams		543
B/740/1	Anthony Eric Williams		543

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/297/1	Llanllechid Community Council		543

### Note

- This objection is subject to NA 233.

### Main Issues

- The effect on the safe and free flow of traffic.
- The effect on trees and wildlife.
- The availability of essential infrastructure.
- The effect on residential amenity.

### Inspector's Considerations and Conclusions

#### *The effect on the safe and free flow of traffic*

1. The DD proposes that 0.55ha of land at Rachub be allocated for the development of some 12 dwellings. At Pre-inquiry Change stage the LPA proposes, via NA 233, that the capacity be reduced to 10 dwellings. Objectors express concern that, because of its location adjacent to a bend in the highway known as Llwyn Bleddyn and the presence of existing accesses, it would not be possible to provide the site with a safe vehicular access. They argue that this highway is already a busy road and that parents and children living on the proposed site would have to cross this in order to walk to the village services, including the school.

2. The Local Highway Authority is satisfied that a safe access can be provided to the site and that Llwyn Bleddyn can accommodate the additional traffic that would be generated. In any case the UDP is to be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access and the existing road network is of a sufficient standard to deal with the flow of traffic that is likely to result from it. I conclude that, read as a

whole, the UDP provides a framework sufficient to secure that no demonstrable harm will arise to the safe and free flow of traffic.

*The effect upon trees and wildlife*

3. Objectors express concern that development of this site might lead to the removal of some of the mature trees, with consequent harm to local biodiversity. The Development Brief for the site notes the importance of these and requires that they be retained. In any case, the UDP is to be read as a whole. Policy B26 will secure that trees, hedgerows and other features that are important to the character of the landscape for nature conservation are retained on-site and are protected during the building process and in the long term.

*The availability of essential infrastructure*

4. Objectors argue that there are potential problems with the capacity of the local surface water drainage and foul sewerage systems. They fear that further development would overload them. Dwr Cymru was consulted on the plan and did not identify these matters as constraints to development. In any case the UDP must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure, including the means of disposing of surface water and sewage.

*The effect on residential amenity*

5. Objectors express concern that development of this land could result in a loss of privacy and an increase in noise suffered by adjacent dwellings. The UDP is to be read as a whole. Policy B22 provides that proposals which would have an unacceptable impact on the amenities of local communities will be refused.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0661) that the DD be modified by the acceptance of NA 233 insofar as it relates to this particular housing allocation;**

**(REC.0662) that no other modification be made to the DD in response to these objections.**

## NEAR CEFN COCH - RHIWLAS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/715/1	Mr RS Grant		51
B/529/3	R Hefin Williams		51
B/529/1	R Hefin Williams		51
B/244/1	Steve Eaves		51
B/315/6	Llanddeiniolen Community Council		51
B/623/1	Melvyn Jones		51

### Main Issues

- The role of new housing development in sustaining local services, facilities and economic activity.
- The effect on the status of the Welsh language and culture within the village.
- The effect on the safe and free flow of traffic.
- The effect on residential amenity.

### Inspector's Considerations and Conclusions

*The role of new housing development in sustaining local services, facilities, and economic activity*

1. The DD proposes that 0.63ha of land be allocated for the development of 15 dwellings near to Cefn Coch, Rhiwlas. At Pre-inquiry Proposed Change stage the LPA proposed to increase the capacity of the allocation to 17 dwellings. The LPA argues that, while the majority of allocated housing development should be located in the Sub-regional Centre, the Urban Centres and the Local Centres, it is necessary to allocate some sites for housing in the Villages in order to provide for the housing needs of those areas and contribute to sustaining local services, facilities and economic activity.

2. Although there are within Rhiwlas some dwellings and other buildings from before the 1960s the overwhelming majority of the village is composed of estates of modern housing. These so dominate the settlement that it can be considered as, essentially, a modern suburban development in the open countryside. For all this rapid and substantial growth the village is almost entirely lacking in facilities and services. There are a number of Churches, a primary school and a post office. Because the very substantial recent residential development has, over the last 30 or 40 years, failed to retain other than a vestigial trace of public facilities or employment and has not stimulated an increase in these, there is no reason to suppose that the development of a further 17 dwellings will have any tangible effect in this regard. For this reason I agree with an objector that the development

of an additional 17 dwellings, in the absence of any significant element of services or employment, would promote the unsustainable development of the village.

3. PPW (paragraphs 2.5.3 and 2.5.4) advises that major generators of travel demand, such as housing, should be located within urban areas or in other locations which are or can be well served by public transport. Sites which are unlikely to be well served by public transport should not be allocated for development. Due to the almost complete lack of facilities and services within Rhiwlas its residents are, at present, dependent on trips to the larger settlements for virtually all of their employment, further education, shopping, health and leisure needs.

4. The village has a bus service but, due to the almost complete lack of facilities in the village, the range of destinations required to be accessed on a day to day basis will undoubtedly be very great. The available bus service will, therefore, be too inflexible in terms of places served and times of operation to satisfy the full range of needs. As a consequence the existing residents are likely to rely on the private car. Additional dwellings will simply reinforce this. I conclude that, due to its particular characteristics, the allocation of housing land within Rhiwlas will, contrary to the views of the LPA, reinforce an unsustainable pattern of settlement. This factor, in its own right, is sufficient in my view to justify the deletion of this proposed allocation from the DD.

*The effect on the status of the Welsh language and culture within the village*

5. An objector argues that the dwellings to be built on the proposed allocation would be occupied predominantly by non-Welsh speakers and that this would have an adverse impact on Welsh language and culture in the village. The LPA, at the inquiry, confirmed that it had satisfied itself that no demonstrable harm to Welsh language and culture would arise from its proposed housing land allocations. No robust evidence was presented to support the objector's view.

*The effect on the safe and free flow of traffic*

6. Objectors argue that the development of houses on this site would require the widening of the adjacent highway and that this would, in turn, increase traffic speeds in the village. The UDP must be read as a whole. Policy CH31 provides that development proposals will be approved only if appropriate traffic calming measures are provided in connection with any development which is likely to lead to a substantial increase in traffic.

*The effect on residential amenity*

7. Objectors note that part of the proposed allocation lies behind existing frontage development. They argue that this could have a harmful effect on the private enjoyment of the existing dwellings. The UDP is to be read as a whole. Policy B22 provides that proposals will be refused if they have an unacceptable impact on amenities, including the reasonable privacy of nearby properties.

*The availability of essential infrastructure*

8. Objectors argue that the sewerage system is not adequate to support the proposed additional dwellings. The plan is to be read as a whole. Policy CH16

provides that development proposals will be refused unless there is adequate provision of necessary infrastructure.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0663) that the DD be modified by the deletion of the proposed housing allocation on land near Cefn Coch, Rhiwlas;**

**(REC.0664) that no other modification be made to the DD in response to these objections.**

**CRAIG Y PANDY & WAUN PANDY TREGARTH**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA249

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/738/1	M Danion		548
B/1233/1	Elizabeth Gleave		548
B/1261/1	Betty Williams		548
B/1243/1	Sonia Williams		548
B/1246/1	Sarah Naylor		548
B/1250/1	Ian Roberts		548
B/952/7	RCH Douglas Pennant	Guy D Evans	548
B/1242/1	Paul Williams		548
B/1252/1	Llion Roberts		548
B/1248/1	Cia Dyck		548
B/1247/1	Matt Anthoine		548
B/1268/1	Richard Lord		548
B/1253/1	D Williams; K Roberts; T Williams		548
B/1251/1	Catherine Harding		548
B/1276/1	Peter Jones		548
B/1279/1	Miss Owen		548
B/1035/3	Llandygai Council		548
B/1274/1	Perry Hawkins		548
B/748/1	Christine & Jeremy Yates		548
B/291/1	Caroline Davies		548
B/1237/1	Mrs L Lindee		548
B/1241/1	Gwen Jones		548
B/1234/1	David Gleave		548
B/1236/1	Mr D McIntyre		548
B/1277/1	Ms S Upton		548
B/812/1	Anne Rhodes		548
B/139/1	Steven Price		548
B/1249/1	John Thompson		548
B/300/1	T Wright		548
B/1272/1	Jean Owen		548
B/1264/1	Gareth & Eileen Pritchard		548
B/1262/1	M Owen		548
B/1258/1	David Bates		548
B/295/1	Chris Davies		548
B/1260/1	Maria Butler		548
B/1275/1	Paula Jones		548

B/952/19	RCH Douglas Pennant	Guy D Evans	548
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**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1259/1	S Jones		548
B/1256/1	Catherine Jones		548
B/844/39	CPRW		548
B/1244/1	Evelyn Roberts		548
B/1240/1	Alison Richards		548
B/1232/1	Mark Richards		548
B/1235/1	Mrs Euronwy Jones		548
B/1239/1	Simon Bareham		548
B/1245/1	Gwynfor Roberts		548
B/1266/1	Ronald Jones		548
B/1271/1	Mrs Eirwen Owen		548
B/1238/1	Fayona Bareham		548
B/1255/1	Mrs Hazel Hughes		548
B/1254/1	Michael Hughes		548
B/1269/1	Harry Evans		548
B/1270/1	A Jones		548
B/1257/1	Thomi Bates		548
B/1267/1	Catrin Parry		548
B/1273/1	Mr Alun Owen		548
B/1278/1	Mr Gareth Jones		548
B/1265/1	Evelyn Jones		548
B/1263/1	Bryn Jones		548

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/2041	RCH Douglas Pennant	Guy D Evans	548
B/952/2040	RCH Douglas Pennant	Guy D Evans	548

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/756/2114	Environment Watch Wales & the Borders		548

**Main Issues**

- The effect of the proposed allocation on the character of the settlement and its surroundings.
- The effect on the safe and free flow of traffic.
- The availability of essential infrastructure.



- The effect on biodiversity.
- The effect on the archaeological resource.
- The effect on the living conditions of adjacent occupiers.

## **Inspector's Considerations and Conclusions**

*The effect of the proposed allocation on the character of the settlement and its surroundings*

1. The LPA proposes, via the DD, to include within the Development Boundary of Tregarth two areas of grazing land known, respectively, as Craig y Pandy and land to the east of Waen y Pandy. The former is a site of 0.32ha which is proposed to be allocated for the development of 6 houses. The latter is not allocated but, because of its proposed location within the Development Boundary would, in principle, be suitable for housing development in accordance with Policy CH3. An objector argues that, in order to reflect the LPA's standard density of 25dph, the capacity of the Craig y Pandy site should be increased to 8 houses. He argues, furthermore, that the land to the east of Waen y Pandy should be increased in size to 1.0ha by the realignment of the Development Boundary to conform to local field boundaries and be allocated for 25 dwellings. At Pre-inquiry Change stage the LPA, via NA 249, proposes to exclude both the sites from the Development Boundary and to delete the Craig y Pandy site from the list of housing allocations.

2. An objector to the proposed Pre-inquiry Change draws attention to the conclusion of the LPA's Development Brief to the effect that the allocated site would link well with the existing development pattern, is in a sustainable location and could be provided with an acceptable vehicular access. That brief had identified no relevant bio-diversity or landscape designations which constrain development. He contends that, even if this allocation was to be deleted, it should be retained as an unallocated area within the Development Boundary with a view to possible future development for affordable housing.

3. Tregarth is a small rural settlement. Both of the areas of land are adjacent to a small pocket of residential development which is detached from this and lies in an entirely open rural landscape some distance to the south west of the consolidated built-up area of the Village. Objectors to both the sites at DD stage argue that they would extend the built-up area into the open countryside. PPW (paragraphs 9.2.21, 9.3.2, 9.3.3 and 9.3.6) recognises that in many parts of the countryside there are isolated groups of dwellings. Sensitive in-filling of small gaps or minor extensions to such groups may be acceptable but much depends on the character of the surroundings and the pattern of development in the area. The cumulative effects of development should not be allowed to damage an area's character. New house building in the open countryside, away from established settlements, should be strictly controlled. Because of its very limited size, the fact that for most of its length it is composed only of housing on one side of the lane, and its distinct separation even from the relatively small settlement of Tregarth, the group of dwellings which is proposed to accommodate the two sites can, in my view, (contrary to the view expressed in the LPA's Development Brief) be regarded as little more than a sporadic residential development in the open countryside. Development of either site in isolation, let alone the development of both, would significantly reinforce the existing ribbon of development, eroding the present rural character of the locality. It would give the group of dwellings as a whole a more built-up aspect. It would unacceptably increase the intrusion of development into

the wider rural landscape. I conclude, for these reasons, that it is not appropriate to include either site within the Development Boundary and to allocate the Craig y Pandy site for housing.

*The effect on the safe and free flow of traffic*

4. Objectors express concern that due to the narrowness of the lane serving the sites, the lack of footpaths and the on-street parking which arises from the lack of parking spaces within the curtilages of the existing dwellings, the erection of additional dwellings would result in traffic congestion and hazard. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic likely to result from a new development.

*The availability of essential infrastructure*

5. Objectors argue that the surface water and foul sewage drainage systems are not adequate to serve additional dwellings. The UDP is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure for the development.

*The effect on bio-diversity*

6. Objectors argue that the proposed residential development would harm bio-diversity. The plan must be read as a whole. Policies B15 and B16 will protect sites of national, regional and local significance.

*The effect on the archaeological resource*

7. Objectors refer to archaeological remains that would be at risk from development in this area. The UDP is to be read as a whole. Policy B7 provides that proposals that would damage or destroy archaeological remains of national importance (whether scheduled or not) or their setting, will be refused.

*The effect on the living conditions of adjacent occupiers*

8. Objectors argue that residential development on both sites would overlook existing dwellings, unacceptably reducing their privacy. The UDP must be read as a whole. Policy B22 provides that proposals that would have an unacceptable impact on the amenities of local communities will be refused.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0665) that the DD be modified by the acceptance of NA 249;**

**(REC.0666) that no other modification be made to the DD in response to these objections.**

## NEAR CROSSING COTTAGE, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA250

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/4	Y Felinheli Community Council		576

### Main Issue

- Whether the DD allocation is appropriate, having regard to the possibility of achieving a safe vehicular access.

### The Inspector's Considerations and Conclusions

1. The DD allocates some 0.23ha of land for the development of 6 dwellings near to Crossing Cottage, Y Felinheli. The objector argues that, due to the physical characteristics of the site, problems of car parking and vehicular access cannot be readily resolved. This would result in harm to the safe and free flow of traffic. The LPA agrees and, via NA 250, proposes to delete the allocation.

2. This long and narrow site lies within the heart of the built-up area of Y Felinheli and fronts onto Caernarfon Road, which is the principal highway through the village. It is within easy walking distance of the shops, primary school and other facilities there. It is on a well served bus route and development would promote the achievement of a sustainable pattern of settlement. PPW (paragraph 9.2.3) does, however, advise that allocated housing sites must be free or easily freed from planning and physical constraints. The site lies well below the level of the adjacent highway. The LPA cannot identify a means by which a safe and convenient vehicular access and adequate on-site car parking space could be provided to the dwellings proposed to be built on it.

3. Such provision is of particular importance in this location because Caernarfon Road is a busy highway which, I observed, carries a constant stream of traffic including buses and some heavy goods vehicles. On-street car parking spaces cannot, therefore, be relied on to provide the necessary capacity. Adjacent side streets are narrow and tortuous. Almost all of them lack pavements. Development, in the absence of the necessary on-site provision, would stimulate on-street parking in places where this would result in harm to the safe and free flow of traffic. For these reasons I agree with the objector and the LPA that the allocation should be deleted from the plan.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0667) that the DD be modified by the acceptance of NA 250;**

**(REC.0668) that no other modification be made to the DD in response to this objection.**

## NEAR TAN Y MAES, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA251

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/1	Y Felinheli Council		571
B/228/5	Y Felinheli Council		571
B/883/1	Carl Mather		571

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/981/5	Mrs M Davies	Gareth J White	571

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/844/2069	CPRW		571
B/756/2115	Environment Watch Wales & the Borders		571

### Main Issue

- Whether the DD allocation is appropriate, having regard to the availability of the land for development.

### Inspector's Considerations and Conclusions

1. The DD proposes to allocate 0.85ha of land near Tan y Maes, Y Felinheli, for the development of 21 houses, some 25% of which would be affordable homes. Objectors argue that a higher proportion of dwellings should be affordable. They express doubts as to the capacity of the roads which serve the site and of the local surface water and foul sewage drainage systems to support the scheme. They argue, furthermore, that the development of this grazing land would extend the built-up area into the open countryside, thereby harming the character and appearance of the locality.

2. PPW (paragraph 9.2.3) advises that, among other things, a site proposed as a housing allocation must be free or readily freed from ownership constraints. In the period since the preparation of the DD the LPA has been notified by the owner of the land that it will not be made available for development in the foreseeable future. It, therefore, proposes, via NA 251, to exclude this land from the Development Boundary and delete the housing allocation. Because the land clearly

does not satisfy a key test for a housing land allocation, as set out in PPW, I agree with the LPA that the DD should be modified in this way.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0669) that the DD be modified by the acceptance of NA 251;**

**(REC.0670) that no other modification be made to the DD in response to these objections.**

## NEAR DRWS Y COED – Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA252

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/981/3	Mrs M Davies	Gareth J White	569

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2087	CPRW		569
B/756/2116	Environment Watch Wales & the Borders		110

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/981/2006	Mrs M Davies	Gareth White Partnership	569

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2022	Welsh Water		569

### Main Issues

- The promotion of a sustainable pattern of settlement.
- The availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

#### *The promotion of a sustainable pattern of settlement*

1. At Pre-inquiry Change stage, in response to an objection to the DD, the LPA has proposed, via NA 252, to extend the Development Boundary of Y Felinheli to include 1.74ha of land near to Drws y Coed and allocate this for the development of 30 dwellings, 35% of which would be affordable homes.

2. Objectors note that this is a green-field site at the edge of the settlement and argue that preference should be given to the development of previously developed land within it. Y Felinheli lacks appreciable quantities of previously

developed land, however. PPW (paragraph 9.2.8) advises that, in such circumstances, the next most sustainable option is the allocation of land which forms an extension to the built-up area. The land at Drws y Coed is immediately adjacent to the built-up area of Y Felinheli and within easy walking distance of the local primary school, the shops and a well served bus route along Caernarfon Road. I conclude that it contributes to the promotion of a sustainable pattern of settlement to the greatest extent that local circumstances allow.

*The availability of necessary infrastructure*

3. An objector argues that it cannot yet be demonstrated, with any certainty, that the necessary water supply and sewerage services can be provided to serve the site. The UDP must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure for them.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0671) that the DD be modified by the acceptance of NA 252;**

**(REC.0672) that no other modification be made to the DD in response to these objections.**



## NEAR TYDDYN PERTHI – Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/6	Y Felinheli Community Council		577
B/228/3	Y Felinheli Community Council		577

### Main Issues

- The availability of essential infrastructure.
- The indicative target for the provision of affordable housing.

### Inspector's Considerations and Conclusions

#### *The availability of essential infrastructure*

1. The DD proposes that 0.52ha of land near to Tyddyn Perthi be allocated for the development of 13 dwellings of which 25% would be affordable homes. The objector argues that there is uncertainty whether the capacity of the adjacent highways and the systems for the disposal of surface water and foul sewage are adequate to support the development. The UDP must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of the necessary infrastructure to support them. The means of disposing of water and sewage are specifically referred to in this policy. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from the new development or that new and adequate improvements can be made.

#### *The indicative target for the provision of affordable housing*

2. The objector argues that 25% of the capacity of the site is an insufficient quantity of affordable housing and that this should be increased, possibly to some 50%. The LPA agrees that it is necessary to maximise the provision of affordable housing. Via NA 233 it proposes to increase the capacity of the site to 15 dwellings and increase the proportion of affordable housing to 35%. In accordance with the advice of PPW (paragraph 9.2.16) the percentage of affordable housing on each allocated site can be presented only as an indicative target. In accordance with the advice of PPW (paragraph 9.2.18) the LPA has proposed NA 157 to the effect that it will discuss the indicative targets, where relevant, and negotiate with developers to include an element of affordable housing on particular sites. The amount provided may well be more or less than the indicative target depending on the site-specific circumstances. I conclude that the NA 233 makes provision for affordable

housing to be developed on this site to the extent that is consistent with the advice of PPW.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0673) that the DD be modified by the acceptance of NA 233 insofar as it relates to this particular housing allocation;**

**(REC.0674) that no other modification be made to the DD in response to these objections.**

**OMISSION OF HOUSING LAND ALLOCATIONS: BANGOR DCA**

## ST MARY'S, LON BOBTY, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1334/1	Steve Williams		503
B/1030/5	University of Wales Bangor	Sian Kilner	503

### Note

- Objection B/1334/1 has been unconditionally withdrawn.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. An objector argues that this land should be included within the Development Boundary of Bangor and be allocated for housing development because it accommodates a long established group of buildings near to the built-up area of the City and to its wide range of services and public transport facilities. Many of the buildings are now vacant and their deterioration would harm the quality of the local environment. It is previously developed land and its development for residential purposes would reduce the need to use green-field sites.

2. The building group does not physically abut the consolidated built-up area of Bangor but is separated from it by a narrow belt of open land. The vehicular access of Lon Bobty is narrow and twisting. It is not of a sufficient standard to serve a residential development of a size which would be possible on this site. This factor reinforces its functional separation from the built-up area of Bangor, notwithstanding its proximity to it.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take and also the physical characteristics of the site, I conclude that it should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0675) that no modification be made to the DD in response to this objection.**

## NEAR RHOS, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/979/3	Robert F Jones	Gareth J White	522

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of Bangor and be allocated for housing development because there is a need for a range of smaller sites to be available to provide a variety of housing types. He believes that this site could provide top of the range executive houses near to major employment opportunities.

2. He contends that particular sites proposed by the LPA for housing allocation in Bangor are incapable of development in whole or in part and that his site can meet a shortfall in supply. I deal with these arguments in the sections of this report which relate to those particular allocations. The LPA notes that the vehicular access to the land would be via a narrow lane and argues that, since the part of this which would link the site to the main road does not appear to be capable of being widened by the use of land within the ownership of the objector, there is no realistic prospect that an acceptable vehicular access can be created. The objector does not contend that he is in a position to widen the road but, instead, argues that only part of the site he identified in his objection be developed and that proximity to major employers will promote work trips on foot rather than by car. Residential development generates trips to a very wide range of destinations, however, and these require a satisfactory vehicular access.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the identified access problem, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0676) that no modification be made to the DD in response to this objection.**

**LAND TO THE EAST OF FAENOL OLD HALL, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1034/18</b>	<b>Wales National Trust</b>	<b>Chris Lambart</b>	



## HENDREWEN FARM, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/332/1	John Lowry		520

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of Bangor and be allocated for housing development because, in his view, the LPA has identified insufficient housing land to meet needs to 2016. He considers that the development of his site would not harm the rural setting of the City, is in an area where potential house purchasers wish to live and can be provided with an acceptable vehicular access. It is near to the range of services and facilities available within the City centre.

2. The proposed area of housing land projects far beyond the eastern edge of the consolidated built-up area of Bangor for some distance into the open countryside. It would not be well related to the built form of the settlement as PPW (paragraph 9.3.1) advises. The road network that would link it to the City is of insufficient width in places to serve a residential development of the size proposed.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and also to the site-specific factors I have identified, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0677) that no modification be made to the DD in response to this objection.**

## LAND TO THE SOUTH OF FFORDD BANGOR, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/29	RCH Douglas Pennant	Guy D Evans	52

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Bethesda and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0678) that no modification be made to the DD in response to this objection.**

**YR ARDD FAWR, BONTUCHAF, BETHESDA**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/346/1</b>	<b>Richard Jones</b>	<b>DL Hughes</b>	<b>524</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land which lies within the Development Boundary of the Local Centre of Bethesda should be allocated for housing development because it is within a built-up area and a satisfactory road access can be provided for it.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

3. Because it is within the proposed Development Boundary of the settlement, residential development would be permitted on part of the identified area even in the absence of an allocation so long as it satisfies the stated criteria of Policy CH3 and other relevant policies.

**RECOMMENDATION**

**I recommend:**

**(REC.0679) that no modification be made to the DD in response to this objection.**

## FFERM CILFODAN, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP19

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1204/1	Emyr & Sally Parry		46

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Local Centre of Bethesda and be allocated for housing development because the buildings on the site form part of the built-up area of the settlement. The LPA agrees that the site is part of the consolidated built-up area of Bethesda and proposes, via NAP 19, to extend the Development Boundary to encapsulate it. I agree that this would reflect the physical characteristics of the site and its relationship to its surroundings. NAP 19 has not, however, been the subject of public consultation and a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do so at modification stage.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(RE.0680) that no modification be made to the DD in response to this objection.**

## Y FRON FIELDS, CILFODEN, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/346/3	Richard Jones	D L Hughes	523

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Bethesda and be allocated for housing development because there is a need for this. He expresses concern that, if the land is not developed, it will become unused and harm local amenity. The site is in an area of Bethesda served by narrow twisting highways. The local highway network is inadequate to serve the number of dwellings which could be accommodated on the site.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the harm that would be caused to the safe and free flow of traffic, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0681) that no modification be made to the DD in response to this objection.**

## LAND TO THE SOUTH OF MAES COETMOR, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/28	RCH Douglas Pennant	Guy D Evans	52
B/952/30	RCH Douglas Pennant	Guy D Evans	52

### Note

- Objection B/952/30 is dealt with in the section of this report which relates to the proposed housing land allocation Near Maes Coetmor, Bethesda.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Bethesda and be allocated for housing development in order to meet local needs.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development. This conclusion is reinforced by the harmful effect of residential development on this prominent site upon the rural setting of Bethesda.

### RECOMMENDATION

I recommend:

**(REC.0682) that no modification be made to the DD in response to these objections.**

**LAND NEAR CILTREFNUS, GERLAN, BETHESDA**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objection to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/957/1</b>	<b>Mr &amp; Mrs R Jones</b>	<b>D L Hughes</b>	

## FIELDS 4794 & 2495, GLASINFRYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/741/1	Mrs N Pritchard		542

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land near to the Rural Village of Glasinfryn should be allocated for housing development because it would fit in well with the way the village looks at present.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres or Villages because this would promote an unsustainable pattern of settlement. This conclusion applies with even more force to land in or adjacent to Rural Villages because of their almost complete lack of facilities and services. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

3. This conclusion is reinforced by the location of the land within the open countryside far from any settlement which has a defined Development Boundary. Development here would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1). This consideration would also make the land unsuitable for the development of the affordable dwellings to which she refers in her response to the LPA's proof.

### RECOMMENDATION

**I recommend:**

**(REC.0683) that no modification be made to the DD in response to this objection.**



**LAND TO THE SOUTH OF LLANDYGAI NORTH OF RUGBY CLUB,  
LLANDYGAI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/952/27</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans</b>	<b>544</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The LPA, in the DD, classifies Llandygai as a Rural Village. It proposes, via NA 255, to reclassify it as a Village and identify a Development Boundary. I deal with the matter of the status of the settlement elsewhere in this report. The objector argues that this land should be included within the Development Boundary which the LPA proposes to draw for the Village of Llandygai and be allocated for housing development because it would contribute to meeting the housing needs of the Bangor DCA and is accessible by both private and public transport.

2. The site is within the open countryside and has an area of some 14.2ha. At a density of between 25 and 30dph it could accommodate between 355 and 426 dwellings. The settlement of Llandygai contains, at present, only some 75 houses. A development on the scale proposed would completely dominate the village and unacceptably change its rural character. It would, effectively, be a major new settlement in the open countryside. Although it would be near to the major new employment site at Bryn Cegin, it would not be well related to retail and community facilities as PPW (paragraph 9.3.1) advises. It would, therefore, generate a large volume of trips to gain access to these, many of which would be by private car.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because, as in this case, this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and also to the impact of development on the character of Llandygai, I conclude that this land should not be allocated for housing

development. This conclusion applies also to the undefined, scaled-down, version of this proposed allocation which is referred to by the objector.

4. The objector also suggests that, instead of allocating the land for housing development, it could simply be included within an extended Development Boundary for Llandygai. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I have concluded that Development Boundaries of Villages should be drawn so as to follow the actual edge of the consolidated built-up area and exclude areas of open countryside.

## **RECOMMENDATION**

**I recommend:**

**(REC.0684) that no modification be made to the DD in response to this objection.**

**LAND TO THE WEST OF THE A5122 ADJACENT TO CRICKET GROUND,  
LLANDYGAI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/952/1</b>	<b>RCH Douglas Pennant</b>	<b>Guy D Evans</b>	<b>537</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The LPA, in the DD, classifies Llandygai as a Rural Village. It proposes, via NA 255, to reclassify it as a Village and identify a Development Boundary. I deal with the matter of the status of the settlement elsewhere in this report. The objector argues that this land should be included within the Development Boundary which the LPA proposes to draw for the Village of Llandygai and be allocated for housing as part of a mixed-use development because it would contribute to meeting the housing needs of the Bangor DCA and is accessible by both public and private transport.

2. The site is of a very considerable size and residential development upon it would completely dominate the village and unacceptably alter its rural character. It would, effectively, be a major new development in the open countryside. Although it would be near to the major new employment site at Bryn Cegin and, as a mixed-use scheme would itself contain some employment, it would not be well related to retail and community facilities as PPW (paragraph 9.3.1) advises. It would, therefore, generate a large volume of trips to gain access to these, many of which would be by private car.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because, as in this case, this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and also to the impact of development on the character of Llandygai, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0685) that no modification be made to the DD in response to this objection.**

## TYDDYN CANOL, RACHUB

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/707/1	Gwen Morgan		545

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Rachub and be allocated for housing development because it would provide a percentage of affordable housing to meet local needs. It is said to have no agricultural value or importance from historical, ecological geological or archaeological points of view. The site is, however, part of a narrow belt of land which separates the Village of Rachub from the Local Centre of Bethesda. Development on the scale proposed would unacceptably erode this gap and the individual identity of these settlements.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of this proposal on the maintenance of the identity of settlements, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0686) that no modification be made to the DD in response to this objection.**

## NEAR CARREG Y GATH, RHIWLAS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/739/1	Wyn Griffith		51
B/739/3	Wyn Griffith		51

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Rhiwlas and be allocated for housing development because the majority of it is previously developed. He believes that its development would make the village a more solid, integrated, community for future generations. The site is a very extensive area of open countryside to the south and west of the village. If developed it would more than double the built-up area of Rhiwlas. It would be tantamount to a new settlement but without the employment, commercial, retail and community facilities which PPW (paragraph 9.3.1) advises are necessary. It would, therefore, reinforce an unsustainable pattern of settlement.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because, as in this case, this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0687) that no modification be made to the DD in response to these objections.**

## SLING, TREGARTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/758/1	Glyn Williams	Julie C Williams	551

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Tregarth and be allocated for the development of affordable housing in order to meet an identified need. The site is an area of rough pasture which lies in open countryside to the south of a small isolated group of dwellings which is enclosed by a Development Boundary and is, itself, separated from the consolidated built-up area of the small village of Tregarth. Having regard to its use, appearance, and wider setting, this land is clearly part of the open rural landscape, notwithstanding the sporadic residential development which has grown along the highway to the south of it. PPW (paragraph 9.2.21) advises that new houses in the countryside away from existing settlements recognised in development plans must be strictly controlled. New housing on this land would not be well integrated with the existing pattern of settlement and would reinforce ribbon development contrary to the advice of PPW (paragraph 9.3.1). For these reasons I conclude that this land should not be allocated for the development of affordable housing.

### RECOMMENDATION

**I recommend:**

**(REC.0688) that no modification be made to the DD in response to this objection.**

## OM NEAR CERRIG LLWYDION, TREGARTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/657/3	Dafydd & Karen Griffith		54

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Tregarth and be allocated for housing development. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

2. Furthermore, for the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I have concluded that the Development Boundaries of Villages should be drawn so that they follow the actual edge of the consolidated built-up area and exclude areas of the open countryside. It is not, therefore, appropriate to extend the Development Boundary of Tregarth into the open countryside to include this land.

### RECOMMENDATION

I recommend:

**(REC.0689) that no modification be made to the DD in response to this objection.**



## BEHIND BRO SYR I FOR, TREGARTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/657/1	Dafydd & Karen Griffith		54

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Tregarth and be allocated for housing development because this would allow local people to purchase building plots and would consolidate the built-up area of the settlement.

2. The development of this land would extend the built-up area of the village into the open countryside and virtually close the gap which separates two arms of the settlement which have developed piecemeal as ribbon development along converging highways. It would, by doing this, unacceptably erode the belt of open land lies between these and which is an important element of the rural setting of the village. It would give the settlement as a whole a much more built-up character.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development on the character and appearance of the village, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0690) that no modification be made to the DD in response to this objection.**

## LAND NEAR GLAN YR AFON, TREGARTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/952/31	RCH Douglas Pennant	Guy D Evans	549

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Tregarth and be allocated for housing development because he considers it to be well related to the structure of the village which, itself, contains a number of essential facilities and is served by public transport.

2. The site is, however, separated from the consolidated built-up area of Tregarth. Due to its long narrow shape it would accommodate only a row of dwellings along one side of a narrow lane. It would, therefore, promote a fragmented pattern of settlement and ribbon development contrary to the advice of PPW (paragraph 9.3.1). It would substantially increase traffic levels on a narrow rural lane and, thereby, harm the safe and free flow of traffic.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the factors to which I refer above, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0691) that no modification be made to the DD in response to this objection.**

## BUSH FARM, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/873/1	Glyn, Linda, Huw & Robin Williams		57

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Y Felinheli and be allocated for housing development because insufficient housing land has been allocated there and dwellings on this particular site would not harm landscape quality. The land, however, occupies a prominent position on high ground. Development upon it would be highly visible from the Menai Straits. It would unacceptably increase the visual impact of the village on the rural and coastal landscape.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to its particular visual impact, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0692) that no modification be made to the DD in response to this objection.**

## LAND OFF FFORDD LLWYN, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/958/1	Mrs G Williams	Partneriaeth Ap Thomas	374

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Y Felinheli and be allocated for housing development because this would be a natural development of this part of the settlement. She refers to a discussion with a LPA staff member at which she agreed to reduce the area of the proposed housing allocation to the extent that it would accommodate only 3 houses. The LPA confirms, however, that the duly made objection to the DD was not formally amended. I must, therefore, have regard to the impact of the objection as it stands. A development of 3 houses would, in any case, be below the size threshold adopted for housing allocations. The related extension of the Development Boundary to facilitate even this small scheme would enclose land which is, at present, part of the open countryside.

2. In the section of this report which relates to 'Affordable Housing for Local Need Text' I have, for the reasons I give there, concluded that the Development Boundaries of villages should be tightly drawn to follow the edge of the consolidated built-up area. It would not, therefore, be appropriate to extend the Development Boundary in this case.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0693) that no modification be made to the DD in response to this objection.**

**OM PLOT 1:LAND BETWEEN PENRALLT & NANT LLWYN; PLOT 2:  
LAND ADJACENT TO FOUR WINDS OFF PENYBRYN ROAD, Y  
FELINHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/341/1</b>	<b>Miss K Williams</b>		<b>56</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that land between Penrallt and Nant y Llwyn, off Bush Road, should be included within the Development Boundary of the Village of Y Felinheli and be allocated for housing development, and that land adjacent to Four Winds, off Penbryn Road (which is already within the Development Boundary), be allocated for housing development. In support of this she argues that not all of the land allocated for housing in the DD will be available for development during the lifetime of the plan.

2. Elsewhere in this report I have considered the merits of the sites which have been proposed for housing allocation by the LPA at both DD and Pre-inquiry Proposed Change stages. As an outcome of this assessment I have, in the section of this report which relates to Policy CH1, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0694) that no modification be made to the DD in response to this objection.**

**DEVELOPMENT BOUNDARIES: BANGOR DCA**

## LAND NEAR BRYN TAWEL FARM, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1003/1	Mr Arthur Jones	Gwyn Jones	504
B/1003/3	Mr Arthur Jones	Gwyn Jones	504

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Sub-regional Centre of Bangor should be realigned to include this land. The site is located on high ground and, as a consequence, development upon it would be unacceptably prominent when viewed from the north. For this reason it would not be well integrated with and connected to the existing pattern of settlement as PPW (paragraph 9.3.1) advises. It forms part of the rural setting of Bangor. I conclude that its inclusion within the Development Boundary would not conform to its stated purpose (DD paragraph 1.3.46) to restrict development to those sites which are within settlements so as to protect the countryside.

### RECOMMENDATION

I recommend:

**(REC.0695) that no modification be made to the DD in response to these objections.**



## NORMAL SITE, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1030/4	Univeristy of Wales, Bangor	Sian Kilner	505

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Sub-regional Centre of Bangor should be realigned to include this land because it is a substantial developed area. It contains an extensive range of buildings used for academic and related purposes and is considered, by the objector, to be clearly not part of the countryside.

2. The DD (paragraph 1.3.46) identifies the purpose of Development Boundaries as being to restrict development to sites that are within settlements so as to regulate development and protect the countryside. The Normal College is separated from the consolidated built-up area of Bangor by a belt of open land, a railway line and a main road. It is clearly detached from the settlement. In my view the LPA is right to adopt the concept of 'settlement' rather than that of 'development' because it is within settlements that one finds, at various scales, the mix of land uses and opportunities that serve individuals and households and which, if safeguarded and reinforced, can help promote a sustainable pattern of development. This Normal College site is too restricted in its range of uses to be considered a settlement in its own right. It should not, therefore, be included within a Development Boundary.

### RECOMMENDATION

I recommend:

**(REC.0696) that no modification be made to the DD in response to this objection.**

## Y GARNEDD, FFORDD PENRHOS, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/945/1	Robin Hardy	Berwyn Owen	138

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Sub-regional Centre of Bangor should be realigned to include this land because it is considered to be located within the developed part of Penrhosgarnedd rather than in the open countryside.

2. The site contains substantial properties within extensive curtilages. The size of these, together with the presence of large trees and the distance from Penrhos Road, confirm that the land is visually distinct from the consolidated built-up area of Bangor at this point. It lies beyond the line of dwellings which front the north western side of that highway within the area of open countryside that abuts the City. The inclusion of this land within the Development Boundary would promote residential development which would not be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises. For this reason I conclude that it should continue to be regarded as being situated in the countryside beyond the Development Boundary.

### RECOMMENDATION

**I recommend:**

**(REC.0697) that no modification be made to the DD in response to this objection.**

## NANT GRAEAN, BRAICHMELYN, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA246

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/307/1	Bryan Griffiths		44
B/314/1	Eric Jones		44
B/55/1	Gwynfor Dafydd		44
B/612/1	Gareth Cook		44
B/616/1	Colin Jeffreys		44
B/625/1	David Williams		44
B/633/1	Kevin Williams		44

### Conditionally Withdrawn Objection to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1003/3	John Glyn Jones	Mr Dave Jump	44

### Note

- The conditionally withdrawn objection above is really B/1000/3.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary of the Local Centre of Bethesda should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside such as this. The LPA has proposed, via NA 246, to extend the Development Boundary at this point

rather than to reduce its extent. For the reasons I give I conclude that this is not appropriate.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0698) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0699) that no other modification be made to the DD in response to these objections and, in particular, that NA 246 be not accepted.**

## CAE BERLLAN, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1000/4	John Glyn Jones	Mr Dave Jump	60

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

The objector argues that the proposed Development Boundary for the Local Centre of Bethesda should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. The stated purpose of Development Boundaries (DD paragraph 1.3.46) is to restrict development to sites that are within settlements so as to regulate development and protect the countryside. In this case the existing vehicular access is not suitable to accommodate further residential development. It would, therefore, be inappropriate to provide, via an extension of the Development Boundary, for a presumption in favour of such development.

For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0700) that no modification be made to the DD in response to this objection.**

## NEAR GWERNYDD, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP 18

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1349/1	Mr & Mrs Jones	Gwynedd Watkin	104

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Local Centre of Bethesda should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NAP 18, seeks to extend the Development Boundary at this point. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0701) that no modification be made to the DD in response to this objection and, in particular, that NAP 18 be not accepted.**

## NEAR TAI'R STABLAU, BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/84/1	Barry Davies		525

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

An objector argues that the proposed Development Boundary for the Local Centre of Bethesda should be realigned to include this land in order to provide for the future development of housing via windfall sites. This site is within an area of sporadic development in the countryside. Further development there would promote a fragmented development pattern contrary to the advice of PPW (paragraph 9.3.1). For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0702) that no modification be made to the DD in response to this objection.**

## 6,7,8 WALTER STREET, RACHUB

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/800/1	Michael Gashe		47

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Rachub should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land lacks adequate provision for vehicular access and no provision can be made for off-street parking within a reasonable walking distance of the site. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0703) that no modification be made to the DD in response to this objection.**



## DEVELOPMENT BOUNDARY, RHIWLAS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/267/3	Peter & Sharon Grace		51

**LAND ADJACENT TO FRONDEG, RHIWLAS**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/342/1</b>	<b>Griffith Owen</b>		<b>51</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Village of Rhiwlas should be realigned to exclude the above land because there is a lack of local need for additional housing. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside such as this. This process would exclude the site referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0704) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0705) that no other modification be made to the DD in response to this objection.**

## OPPOSITE CAE GLAS, RHIWLAS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/926/1	Mr Peter Hennessey	Berwyn Owen	51

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Rhiwlas should be realigned to include this land in order to provide for the future development of housing via windfall sites. He notes that planning permission was granted for the residential development of this land in 1968 and 1973 and contends that there have been no material changes in planning circumstances since that time. There has, however, been a pronounced change in national planning policy which now seeks to promote a sustainable pattern of settlement.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0706) that no modification be made to the DD in response to this objection.**

**LAND ADJACENT TO TY'N Y WEIRGLODD, RHIWLAS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA248

**Conditionally Withdrawn Objection to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/944/1	Mr Elwyn Jones	Berwyn Owen	51

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2113	Environment Watch Wales & the Borders		51

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Rhiwlas should be realigned to include this land in order to conform to the curtilage of nearby buildings. The LPA agrees and, via NA 248, proposes to extend the Development Boundary at this point. The objector does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0707) that no modification be made to the DD in response to these objections and, in particular, that NA 248 be not accepted.**

## LAND AT BRYN HYFRYD, DOB, TREGARTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/690/1	C Colin		550

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Tregarth should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land is surrounded on all sides by open countryside. It would not be well connected to or integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises and its development would promote a fragmented pattern of settlement.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0708) that no modification be made to the DD in response to this objection.**

**DEVELOPMENT BOUNDARY – PENYBRONYDD, TREGARTH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/828/1</b>	<b>David Ellis</b>		
<b>B/112/1</b>	<b>Buckley Jones</b>		

**DEVELOPMENT BOUNDARY, TALYCAE, TREGARTH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/234/1</b>	<b>W Hughes</b>		
<b>B/644/1</b>	<b>David Hulton</b>		

**CAERAU, TAL Y CAE, TREGARTH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/790/29	Gwynedd Archaeological Trust		578

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/698/1	Dyfrig Morris Williams		

**Main Issue**

- The protection afforded to archaeological sites.

**Inspector's Considerations and Conclusions**

1. The objector has not been able to work out from the Proposals Map whether this site has been allocated for any particular purpose in the UDP. That document confirms that part of it has been included within the Development Boundary, but none of it has been allocated for any specific form of development. The objector is concerned to protect a nearby archaeological site. This would be secured via Policy B7.

**RECOMMENDATION**

**I recommend:**

**(REC.0709) that no modification be made to the DD in response to this objection.**



## CAE ROWEN, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/241/1	John Owen		570

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Y Felinheli should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0710) that no modification be made to the DD in response to this objection.**

## HAFODLE UCHAF, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/546/3	Huw Roberts		573

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Y Felinheli should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The land referred to by the objector comprises two extensive areas of agricultural land within the open countryside, both of which are a considerable distance from the consolidated built-up area of any settlement. PPW (paragraph 9.3.6) advises that new development in the open countryside, away from established settlements, should be strictly controlled. Its development would create a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0711) that no modification be made to the DD in response to this objection.**

**EDUCATION, HEALTH AND PUBLIC FACILITIES: BANGOR DCA**

**EDUCATION, HEALTH AND PUBLIC SECTOR FACILITIES, NEAR  
YSBYTY GWYNEDD, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Draft Deposit Unconditionally Withdrawn**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/844/37</b>	<b>CPRW</b>		

**CYCLE ROUTES: BANGOR DCA**

## CYCLE ROUTE IN BETHESDA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/42	CCW		612

### Main Issue

- Whether the DD is appropriate, having regard to the prospects for implementation.

### Inspector's Considerations and Conclusions

1. The objector argues that a cycle path should be designated on the Proposals Map to link Bethesda to Bangor. Lon Las Ogwen extends from the outskirts of Bangor to the western end of Tregarth and a section of the former mineral railway provides another part of this route from the eastern end of Coed y Parc to the Penrhyn Quarry. The LPA confirms, however, that no specific scheme has yet been identified to link these two sections together into a single route. PPW (paragraph 3.1.6) advises that UDPs should give developers and the public certainty about the type of development that will be permitted at a given location. It is not, therefore, possible for the LPA to go further than it has in respect of this cycle route.

### RECOMMENDATION

I recommend:

**(REC.0712) that no modification be made to the DD in response to this objection.**

## LON LAS, Y FELINHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/228/7	Y Felinheli Community Council		572

### Main Issue

- Whether the DD is appropriate, having regard to the degree of protection afforded to 'green lanes'.

### Inspector's Considerations and Conclusions

1. The objector expresses concern that Lon Las in Y Felinheli is insufficiently well protected from development. The sections that lie within the Development Boundary are protected by policy CH21. Policy CH20 protects all other parts of the network.

### RECOMMENDATION

I recommend:

**(REC.0713) that no modification be made to the DD in response to this objection.**

**PLAY AREAS: BANGOR DCA**



**NEAR FFORDD PENRHYN, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/293/4</b>	<b>Maesgeirchen Partnership</b>		<b>499</b>

**Main Issue**

- Whether the site should be designated as a Protected Play Area.

**Inspector's Considerations and Conclusions**

The Council accepts that the site should be designated as a Protected Play Area. Although it has not offered a Proposed Change to the Plan to reflect this, it has indicated its intention to undertake the necessary designation at the proposed modifications stage. I agree that such a change would reflect the value of the site as a recreational facility.

**RECOMMENDATION**

**I recommend:**

**(REC.0714) that the DD be modified by designating the site as a Protected Play Area**

**(REC.0715) that no other modification be made to the DD in response to this objection.**

## GWERN LAS, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/293/1	Maesgeirchen Partnership		501

### Main Issue

- Whether the DD is appropriate, having regard to the protection from development of areas of recreational value.

### Inspector's Considerations and Conclusions

1. The objector expresses concern that specific areas of recreational value are not shown as protected play areas on the Proposals Map for Bangor. These sites are located outside the Development Boundary of that settlement. The supporting text for Policy CH40 confirms that its protection applies not only to the areas shown on the Proposals Map (i.e. those within the Development Boundaries) but also those outside the built form of towns and villages.

### RECOMMENDATION

I recommend:

**(REC.0716) that no modification be made to the DD in response to this objection.**

**MIN Y DDOL, BANGOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/293/3</b>	<b>Maesgeirchen Partnership</b>		<b>501</b>

**Note**

- This objection is dealt with in the section of this report which relates to Gwern Las, Bangor.

## PLAYING FIELD BEACH ROAD, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1345/1	Margaret Player		501

### Main Issue

- Whether the DD is appropriate, having regard to the degree of protection afforded to the recreational function of this land.

### Inspector's Considerations and Conclusions

1. The objector is concerned that the playing field on Beach Road, Bangor is not shown on the Proposals Map as a protected play area. The site is part of a wider area that is shown on the proposals map as a Redevelopment Area, but this is simply to secure that an integrated comprehensive development is achieved on areas of closely related land. The LPA confirms that it is not the intention that this particular area be redeveloped. Indeed, it confirms that the playing field contributes to the overall vitality of the Hirael Bay area and its protection from development is necessary to ensure a successful redevelopment of the wider area. This is reiterated in the Hirael Bay Development Brief which recognises that the playing field is an important open space that must be protected and integrated into any redevelopment proposal for the locality. Policy CH40 protects this recreational resource from development notwithstanding the absence of a designation on the Proposals Map.

2. Because the Council does not dispute the importance of the site as a playing field, it appears to me appropriate that it is designated in the Plan as a Protected Play Area. Such a designation would provide greater protection than a clause within the Development Brief, and would provide clearer guidance to prospective developers. There seems to be no reason to prevent the site continuing to be identified on the Inset Plan as a Redevelopment Site should the Council deem it necessary. Whether this is done by applying cross-hatching over the yellow shading on the Inset Map or by some other means, such as an additional annotation on the map or a comment in the Development Brief, would be for the Council to determine.

### RECOMMENDATIONS

**I recommend:**

**(REC.0717) that the DD be modified by the identification of the playing field at Beach Road, Bangor, as a Protected Play Area.**

**(REC.0718) that no other modification be made to the DD in response to this objection.**

## TREM ELIDIR, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA234

This Section is subject to Further Proposed Change NAP102

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1316/1	Councillor W Lovelock		500

### Main Issue

- Whether the DD is appropriate, having regard to the protection of the above area from development.

### Inspector's Considerations and Conclusions

1. The objector argues that land at Trem Elidir, Bangor, should be shown on the Proposals Map as a protected play area. The LPA agrees and proposes to secure this via NAP 102. This Further Proposed Change has not been the subject of public consultation and a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do this at modification stage.

### RECOMMENDATION

I recommend:

**(REC.0719) that no modification be made to the DD in response to this objection.**

## TREM ELIDIR, BANGOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA234

This Section is subject to Further Proposed Change NAP102

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1316/1	Councillor W Lovelock		500

### Main Issue

- Whether the DD is appropriate, having regard to the protection of the above area from development.

### Inspector's Considerations and Conclusions

1. The objector argues that land at Trem Elidir, Bangor, should be shown on the Proposals Map as a protected play area. The LPA agrees and proposes to secure this via NAP 102. This Further Proposed Change has not been the subject of public consultation and a full debate on its merits has not been possible. If the LPA wishes to pursue this it should do this at modification stage.

### RECOMMENDATION

I recommend:

**(REC.0719) that no modification be made to the DD in response to this objection.**

**SITE-SPECIFIC OBJECTIONS: CAERNARFON DCA**



**SETTLEMENT STATUS: CAERNARFON DCA**

## BETHESDA BACH & TY'N LÔN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA319

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/710/1	W Evans	Gwynedd Watkin	108
B/831/1	Ken Hughes		108

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/831/2003	Kenneth Hughes		108
B/756/2152	Environment Watch Wales & the Borders		108

### Main Issue

- Whether the DD is appropriate, having regard to the settlement status of Bethesda Bach and Ty'n Lon.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that these settlements should be regarded as part of the open countryside. Objectors variously argue that they should be classified as a Rural Village or as a Village and that a large area of land should be allocated there for housing development. The LPA at Pre-inquiry Proposed Change stage considers that these areas should be classified as a Rural Village because they have a single facility, i.e. a bus service. It proposes to achieve this via NA 319. This approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development.

2. Both these places are nothing more than small sporadic developments in the open countryside, development on any scale, let alone a substantial housing allocation, would reinforce an unsustainable pattern of settlement. For these reasons both locations should be regarded as part of the open countryside in policy terms.

**RECOMMENDATION**

**I recommend:**

**(REC.0720) that no modification be made to the DD in response to these objections and, in particular, that NA 319 be not accepted.**

## CARMEL SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/5	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the status of this settlement.

### Inspector's Considerations and Conclusions

1. Carmel is classified in the DD as a Village. The objector argues that the settlement is too small to accommodate any further development and should be reclassified as a Rural Village. I agree that the facilities and services available at Carmel are so limited that the prospect of any significant residential development there would reinforce an unsustainable pattern of settlement. If, however, my recommendation (REC.0443) is accepted, this will limit future building to only genuine in-fill within the existing fabric of the settlement. This will satisfy the objector's concerns without the need to reclassify the settlement.

### RECOMMENDATIONS

I recommend:

**(REC.0721) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0722) that no other modification be made to the DD in response to this objection.**

## CEUNANT SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA320

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
A/158/1	Gwenno Jones		294
B/713/3	Michael Jones		294

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2153	Environment Watch Wales & the Borders		109

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Ceunant be regarded as part of the open countryside. Objectors argue that it should be reclassified as a Rural Village. The LPA agrees and proposes NA 320 to achieve this. It considers that the availability of a bus service justifies this status. Such an approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. The area proposed for designation as a Rural Village is nothing more than a loose sporadic development in the open countryside. It is not a settlement in any sense of the word. Designation as a Rural Village would simply reinforce an unsustainable pattern of settlement contrary to the advice of PPW.

### RECOMMENDATION

I recommend:

**(REC.0723) that no modification be made to the DD and, in particular, that NA 320 be not accepted.**

## CWM Y GLO SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/6	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the status of this settlement.

### Inspector's Considerations and Conclusions

1. Cwm y Glo is classified in the DD as a Village. The objector argues that the settlement is too small to accommodate any further development and should be reclassified as a Rural Village. I agree that the facilities and services available at Cwm y Glo are so limited that the prospect of any significant development there would reinforce an unsustainable pattern of settlement. If, however, my recommendation (REC.0443) is accepted, this will limit future building to only genuine in-fill within the existing built-up fabric of the settlement. This will satisfy the objector's concern without the need to reclassify the settlement.

### RECOMMENDATIONS

I recommend:

**(REC.0724) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0725) that no other modification be made to the DD in response to this objection.**

## DINAS DINLLE SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/7	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the status of this settlement.

### Inspector's Considerations and Conclusions

1. Dinas Dinlle is classified in the DD as a Village. The objector argues that the settlement is too small to accommodate any further development and should be reclassified. The settlement consists of little more than isolated pockets each containing a very few dwellings. Its further development would promote an unsustainable pattern of settlement. It is quite simply a small sporadic development in the open countryside and should be regarded as part of the countryside in policy terms.

### RECOMMENDATIONS

I recommend:

**(REC.0726) that the DD be modified by the deletion of Dinas Dinlle from the category of Village and its treatment as being within the countryside in policy terms;**

**(REC.0727) that no other modification be made to the DD in response to this objection.**

## DINORWIG SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/315/7	Llanddeiniolen Community Council		349

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. Dinorwig is classified in the DD as a Rural Village. The objector argues that it should accommodate further housing development. The settlement is, in fact, no more than a loose and scattered sporadic residential development in the open countryside. Further residential development there would promote an unsustainable pattern of settlement contrary to the advice of PPW. It should not, therefore, be reclassified as a Village.

### RECOMMENDATION

**I recommend:**

**(REC.0728) that no modification be made to the DD in response to this objection.**



## DOLYDD/MAEN GOCH SETTLEMENT STATUS AND DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP 38

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/9	Environment Watch Wales & the Borders		115

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/81/1	Griffith Jones		351

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The DD classifies small scattered groups of dwellings and other land uses related to them in this location as Villages and Rural Villages. The size of each of these groups is far too small to be considered as anything other than a sporadic development in the open countryside. This would remain the case even if NAP 38 was accepted and additional buildings were identified as relating to them. Further development in these places would reinforce an unsustainable pattern of settlement.

### RECOMMENDATIONS

I recommend:

**(REC.0729) that the DD be modified by the classification of the building groups at Dolydd/Maen Coch as being within the countryside in policy terms;**

**(REC.0730) that no other modification be made to the DD in response to these objections.**

## GALLT Y FOEL SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA321

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/315/1	Llanddeiniolen Community Council		352

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The objector argues that there should be more development in the very smallest settlements. This would, however, stimulate the need to travel to gain access to most day to day services. This, given the limited range of places served by public transport and the inflexibility of timetables, would stimulate the use of the private car particularly when a trip is intended to serve several purposes. This would be contrary to the advice of PPW.

2. Gallt y Foel is a sporadic development in the open countryside and should not be classified as a Rural Village, notwithstanding the LPA's Pre-inquiry Proposed Change NA 321. It should continue to be treated as part of the open countryside in policy terms.

### RECOMMENDATION

I recommend:

**(REC.0731) that no modification be made to the DD in response to this objection and, in particular, that NA 321 be not accepted.**

## GROESLON/WAUNFAWR SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/656/1	John Davies		608
B/73/1	William Hughes		365

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. Both objectors argue that an area of land which lies within a small sporadic development in the open countryside to the north of the proposed Rural Village of Groeslon/Waunfawr should be identified as a location suitable for housing development. Such a development would rely on the use of the private car for virtually every trip. It would reinforce an unsustainable pattern of settlement contrary to the advice of PPW (paragraph 9.1.2). Having regard to the character of the site and its surroundings it should continue to be treated as part of the countryside in policy terms.

### RECOMMENDATION

I recommend:

**(REC.0732) that no modification be made to the DD in response to these objections.**

## GROESLON WAUNFAWR RURAL VILLAGE DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA315

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/756/2151	Environment Watch Wales & the Borders		109

#### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

#### Inspector's Considerations and Conclusions

1. Groeslon Waunfawr is proposed in the DD to be classified as a Rural Village. The objector argues that due to its small size and the absence of any supporting facilities it should not be accorded that status. The LPA responds to this by proposing to extend its area via NA 315.

2. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I recommend that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms. If my recommendation (REC.0451) is accepted this will satisfy the concerns of the objector. The few extra houses proposed to be added to the proposed Rural Village by NA 315 do not materially change my view of the role of this settlement.

#### RECOMMENDATIONS

**I recommend:**

**(REC.0733) that the DD be modified in accordance with my recommendation (REC.0451);**

**(REC.0734) that no other modification be made to the DD in response to this objection and, in particular, that NA 315 be not accepted.**

## LLANFAGLAN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/704/1	Bontnewydd Community Council		372

### Main Issue

- Whether the DD is appropriate, having regard to the quality of development for which planning permission is granted.

### Inspector's Considerations and Conclusions

1. The objector expresses the view that development similar to a particular scheme which has been permitted in the vicinity of Llanfaglan should not, in the future, receive planning permission. The plan is to be read as a whole. Policy B21 controls design quality and CH7 controls new dwellings in the countryside. Objections to the structure and content of these and related policies are dealt with elsewhere in this report.

### RECOMMENDATION

**I recommend:**

**(REC.0735) that no modification be made to the DD in response to this objection.**

## RHOS ISAF RURAL VILLAGE DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA316; NA317

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/778/1	Mrs Eleanor Williams		176
B/215/1	Mr Hugh Williams		172
B/1331/1	Eileen Parry		404 & 102
B/1331/3	Eileen Parry		403

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/780/1	Miriam Jones		402

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1331/2004	Eileen Parry		402
B/1331/2005	Eileen Parry		402

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the settlement.

### Inspector's Considerations and Conclusions

1. Rhos Isaf is proposed, in the DD, to be classified as a Rural Village. The objectors variously argue that particular plots of land should or should not be included within the general area defined by the grouping of the identified dwellings. The LPA agrees that particular parcels of land should be added to the defined area and proposes to secure this via NA 316 and NA 317.

2. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I have recommended that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms. My recommendation (REC.0446) is relevant to this matter. These reasons are sufficient justification for the scope of this proposed Rural Village to be not further extended.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0736) that the DD be modified in accordance with my recommendation (REC.0446);**

**(REC.0737) that no other modification be made to the DD in response to these objections and, in particular, that NA 316 and NA 317 be not accepted.**

## SARON SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/544/1	John Owen		414

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The settlement of Saron is proposed in the DD to be classified as a Rural Village. The objector argues that it should be assigned a Development Boundary (i.e. that it be reclassified as a Village) and that this should include a particular field with a view to its future development. Saron is no more than a small, isolated, sporadic development in the open countryside. Further development would promote an unsustainable pattern of development contrary to the advice of PPW (paragraph 9.1.2). For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I recommend that the areas proposed in the DD to be classed as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. These reasons justify not raising the status of Saron to a Village.

### RECOMMENDATION

**I recommend:**

**(REC.0738) that no modification be made to the DD in response to this objection.**



## SEION SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/315/5	Llanddeiniolen Community Council		415

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. Seion is proposed in the DD to be classified as a Rural Village. The objector argues that it is necessary to accommodate more housing development there than would be permitted under that classification. Seion is, however, no more than a small sporadic isolated development in the open countryside. Further development would promote an unsustainable pattern of settlement contrary to the advice of PPW (paragraph 9.1.2). For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Needs Text' I recommend that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. These reasons justify not raising the status of Seion to a Village.

### RECOMMENDATION

I recommend:

**(REC.0739) that no modification be made to the DD in response to this objection.**

## TAN Y COED SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/936/1	Neil Thorman	Merfyn Jones-Evans	421

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/769/1	E Griffith		421

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The settlement of Tan y Coed is proposed in the DD to be classified as a Rural Village. The objector argues that it should be assigned a Development Boundary (i.e. that it should be reclassified as a Village) and that a particular area of land should be included within this with a view to its future development for affordable housing. Tan y Coed is no more than an isolated sporadic development in the open countryside. Further development would promote an unsustainable pattern of settlement contrary to the advice of PPW (paragraph 9.1.2). For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I recommend that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the countryside in policy terms. These reasons justify not raising the status of Tan y Coed to a Village.

### RECOMMENDATION

I recommend:

**(REC.0740) that no modification be made to the DD in response to this objection.**

## TAN Y COED RURAL VILLAGE DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA318

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/20/1	John & Gwyneth David		422

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the settlement.

### Inspector's Considerations and Conclusions

1. Tan y Coed is proposed, at DD stage, to be classified as a Rural Village. The objector argues that an additional dwelling should be included within its defined scope. The LPA agrees and seeks to secure this via NA 318. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I recommend that the areas proposed in the DD to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms. My recommendation (REC.0451) is relevant to this matter. These reasons are sufficient justification for the area of this proposed Rural Village to be not further extended.

### RECOMMENDATIONS

I recommend:

**(REC.0741) that the DD be modified in accordance with my recommendation (REC.0451).**

**(REC.0742) that no other modification be made to the DD in response to this objection and, in particular, that NA 318 be not accepted.**

**HOUSING GENERAL: CAERNARFON DCA**

## GENERAL HOUSING IN CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1218/3	Llandwrog Community Council		

## GENERAL HOUSING IN LLANLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/552/1	Richard & Sandra Foreshaw		
B/742/1	John G & K Jones		

## GENERAL HOUSING IN WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/718/1	P Basterfield		430

### Note

- Objection B/718/1 is dealt with in the section of this report which relates to objections to the proposed alignment of the Development Boundary near Nant y Mynydd, Waunfawr, in the Caernarfon DCA.

**HOUSING LAND ALLOCATIONS: CAERNARFON DCA**



## REAR OF BRO EGLWYS, BETHEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/78/4	John Williams		247
B/315/4	Llanddeiniolen Community Council		247

### Main Issues

- The demand for new housing in Bethel.
- The effect of development on the safe and free flow of traffic.
- The availability of essential infrastructure.

### Inspector's Considerations and Conclusions

#### *The demand for new housing in Bethel*

1. The DD proposes that 0.8ha of land at the rear of Bro Eglwys, Bethel, be allocated for the development of 19 dwellings of which, at DD stage, it is proposed that 20% be affordable homes. At Pre-inquiry Proposed Change stage the LPA proposes, via NA 233, that this proportion be increased to 40%. An objector argues that local people cannot afford to buy houses in the village. No information on the purchasing power of local residents is, however, presented to support this assertion. In any case, PPW (paragraph 9.2.4) advises that normally there should be no restriction on the occupancy of market housing. No robust evidence has been presented to justify restricting such housing at Bethel to local people only. I conclude, therefore, that the allocation is one which will meet needs arising within a wider area.

#### *The effect of development on the safe and free flow of traffic*

2. An objector argues that the development of this allocation would overload the local road network. The Local Highway Authority is, however, satisfied that it would not do so. The UDP is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road infrastructure is of sufficient standard to deal with the flow of traffic that is likely to result. I conclude that the UDP, read as a whole, provides an appropriate framework to secure that the development of allocated sites will not result in harm to the safe and free flow of traffic.

#### *The availability of essential infrastructure*

3. An objector argues that there is a shortage of local school places and of capacity in the water supply and sewerage systems of Bethel. The plan is to be

read as a whole. In relation to the water supply and sewerage concerns, Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to support them. Policy CH35 provides that when a new residential development is permitted in circumstances where the educational needs of the children living in the new dwellings could not be met at an existing school, planning conditions or obligations will be used to ensure that the developer provides or contributes towards the necessary facilities. I conclude that the UDP, read as a whole, provides an appropriate framework to secure that the development of allocated sites does not impose an undue burden on the existing infrastructure of all sorts.

## **RECOMMENDATION**

**I recommend:**

**(REC.0743) that no modification to be made to the DD in response to these objections.**

## NEAR CEFN WERTHYD, BONTNEWYDD

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA262

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1310/1	Bontnewydd Community		135
B/1309/1	Aled Jones-Griffiths		135
B/751/1	Llyr B Jones		135

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/311/4	TM Wheldon-Williams		135

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/1423/2004	Watkin Jones & Son Ltd		135
B/1439/2001	Llifon & Ffion Jones		135
B/1440/2001	Heulwen Jones		135

### Main Issues

- The effect of development on the rural setting of Bontnewydd.
- The effect on the safe and free flow of traffic.
- The effect on residential amenity.
- The availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

#### *The effect of development on the rural setting of Bontnewydd*

1. The DD proposes that 0.9ha of land be allocated for the erection of 17 dwellings on land near to Cefn Werthyd, Bontnewydd, of which about 40% would be affordable homes. In response to the various objections to this allocation the LPA, via NA 262, proposes to exclude the site from the Development Boundary and delete the allocation. An objector argues that development would extend the settlement into the surrounding countryside significantly eroding the rural setting of the village. PPW (paragraph 2.5.3) advises that major generators of travel demand, such as housing, should be located within existing urban areas or other

localities which are, or can be, well served by public transport or can be reached by walking or cycling. The residents of Bontnewydd have access to local shops, a post office, a primary school, pub and chapel. The employment opportunities and services of Caernarfon are accessible at a distance of 3km via a surfaced cycle route and footpath. It must, therefore, be regarded as a sustainable location. The site is bounded on three sides by existing dwellings and its development would not effect a significant extension of the settlement into the rural area. It would, instead, consolidate the built-up area. I conclude that it would leave the rural setting of the village substantially unharmed and that any marginal visual intrusion is more than outweighed by the contribution of development to a sustainable pattern of settlement.

*The effect on the safe and free flow of traffic*

2. An objector argues that the road serving the site is narrow and that development would increase the use made of it to the detriment of highway safety. The necessary road widening can be undertaken within the site itself, however. The Local Highway Authority has confirmed that space exists within the road junction at its south east corner to accommodate a necessary roundabout. In any case the plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result from them or that adequate improvements can be made to it.

*The effect of development on residential amenity*

3. Objectors argue that development of this allocation would erode the private enjoyment of existing adjacent dwellings. Whether such an outcome would arise depends on the design and layout of development. The plan is to be read as a whole. Policy B22 provides that proposals that would have an unacceptable impact on the amenities of local communities will be refused. A specific reference is made in this policy to the maintenance of the reasonable privacy of nearby properties.

*The availability of necessary infrastructure*

4. Objectors argue that the development would adversely affect the water supply and sewerage services to the existing adjacent dwellings. They also refer to a medium pressure gas pipeline that crosses the site and argue that the presence of this is a substantial inhibition to development. A counter-objector has demonstrated that the gas pipeline could be diverted onto adjacent land in the same ownership as the proposed allocation and, with reference to a detailed estimate from the relevant utility company, that the costs of this could be easily accommodated within the overall development budget of the site.

5. The site is, therefore, capable of being readily freed from this constraint as PPW (paragraph 9.2.3) requires. Furthermore, the plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to serve them. This will secure that a development scheme would be approved only if it incorporated the provision of sufficient capacity to serve its own needs without eroding the capacity of the systems that serve existing dwellings.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0744) that no modification be made to the DD in response to these objections and, in particular, that NA 262 be not accepted;**

**(REC.0745) that no other modification be made to the DD in response to these objections.**

**REAR RHES BEUNO/NEAR RHES BRYMER - BONTNEWYDD**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA263

This Section is subject to Pre-Inquiry Proposed Change No: NAP51

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/946/1	Mr & Mrs R Griffiths	Berwyn Owen	135

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/946/2003	Mr & Mrs R Griffiths		135
B/924/2024	Lord Newborough	Guy D Evans (Carter Jonas)	135
B/1423/2005	Watkin Jones & Son		135
B/844/2088	CPRW		135
B/1499/2001	Marian Pritchard		135
B/756/2125	Environment Watch Wales & the Borders		110
B/1637/2001	Glyn Jones		135
B/1649/2003	M Brymer		135

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/1542/2001	Cymdeithas Tai Eryri		
B/704/2003	Bontnewydd Community Council		
B/969/2024	Welsh Water		
B/969/2023	Welsh Water		
B/1649/2001	M Brymer		

**Note**

- Objection B/1356/2001 is dealt with in this section of the report.

**Main Issues**

- The effect of development on the rural setting of Bontnewydd.

- The effect on the safe and free flow of traffic.
- The availability of necessary infrastructure.
- The effect on the agricultural land resource.

## **Inspector's Considerations and Conclusions**

### *The effect of development on the rural setting of Bontnewydd*

1. At Pre-inquiry Proposed Change stage the LPA, via NA 263, proposes to extend the Development Boundary of Bontnewydd to include 1.35ha of land to the rear of Rhes Beuno and near to Rhes Brymer and to allocate this for the development of some 23 dwellings of which 30% would be for affordable homes. By means of the same Pre-inquiry Proposed Change the Development Boundary would, in response to an objection made at DD stage, be extended to include the Meifod Country Restaurant which lies to the north of these. By means of NAP 51 the LPA, in response to a counter-objection, proposes to further extend the Development Boundary by including part of the field near to the rear of Brymer Terrace. This would effect a link between the two areas proposed for allocation via NA 263 with a view to providing a satisfactory vehicular access.

2. The LPA proposes the allocation of land to the rear of Rhes Beuno and near to Rhes Brymer because it has identified the scope for additional residential development at Bontnewydd but has proposed to delete its DD allocation at Cefn Werthyd. It regards the Pre-inquiry Proposed Change as effecting a necessary substitution of sites. For the reasons I give in relation to the land at Cefn Werthyd I have recommended that this be retained as an allocation in the plan. If my recommendation is accepted there would be no need for the allocations which are proposed via NA 263.

3. The land behind Rhes Beuno abuts existing residential development on only two sides. Its development would effect a visually significant extension of the village into the open countryside, very substantially eroding its rural setting. The land near to Rhes Brymer is bounded on the west and the east by open countryside. By extending a finger of development into the open countryside its visual impact would be even more pronounced.

4. The area around Meifod which is proposed for inclusion within the Development Boundary is very much larger than that occupied by the restaurant building itself. The DD (paragraph 1.3.46) confirms that the purpose of Development Boundaries is to restrict development to sites that are within settlements. Policy CH3 provides that, in principle, proposals to build dwellings on undesignated infill sites within the Development Boundaries of villages will be approved provided that various criteria are satisfied. Extending the Development Boundary to include Meifod would, therefore, expose this site to the prospect of development which would extend the finger of urban uses even further into the open countryside. If the argument of a counter-objector, that the area to be included in the Development Boundary at Meifod should be extended even more to include land yet further to the north, was accepted, the harmful visual impact would be even more pronounced. The effect of NAP 51 would be to reinforce this group of proposals which, for the reasons I have given, are unacceptable in visual terms because they would erode the rural setting of Bontnewydd.

*The effect on the safe and free flow of traffic*

5. An objector expresses concern that these proposals would generate additional vehicular traffic and, thereby, increase the prospect for hazard and congestion. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access and the existing road network can support the additional traffic likely to be generated. Another objector emphasises the potential benefit of providing off road car parking for the residents of the terraced properties fronting the busy A road as part of the site's development but this consideration does not justify the harm that I have identified in relation to the first main issue.

*The availability of necessary infrastructure*

6. An objector argues that the existing infrastructure is insufficient to support additional development. The plan is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure.

*The effect on the agricultural land resource*

7. An objector expresses concern that the proposals would reduce the stock of best and most versatile agricultural land. The land is not, however, in the grades 1, 2 or 3a. It is not, therefore, of best and most versatile agricultural quality.

## **RECOMMENDATION**

**I recommend:**

**(REC.0746) that no modification be made to the DD in response to these objections and, in particular, that proposed Pre-inquiry Change NA 263 and Further Proposed Change NAP 51 be not accepted.**



## NEAR CAEATHRO BACH, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA265

This Section is subject to Further Proposed Changes Nos: NAP15

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/10	Welsh Water		208

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/52/1	Clive James		208
B/1043/13	Waunfawr Community Council		208

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/26/2002	Mrs Elma Williams	Gareth J White	208

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/1373/2001	Hywel Roberts		208
B/1423/2006	Watkin Jones & Son Ltd		208
B/52/2003	Clive James		208
B/756/2126	Environment Watch Wales & the Borders		208

### Main Issue

- Whether the DD is appropriate having regard to the availability of necessary infrastructure.

## **Inspector's Considerations and Conclusions**

1. The DD proposes that 0.7ha of land near Caeathro Bach, be allocated for the development of 6 dwellings. An objector argues that the local sewage treatment works is at capacity. In response the LPA has proposed, via NA 265, that the site be excluded from the Development Boundary of Caeathro and deleted as a housing allocation.

2. PPW (paragraph 2.5.3) advises that major generators of travel demand, such as housing, should be located within existing urban areas or in other locations which are or can be well served by public transport or can be reached by walking or cycling. In paragraph 9.2.9 it advises that, in deciding which sites to allocate for housing, an LPA should have regard to the location and accessibility of potential development sites to jobs, shops and services by modes other than the car. The capacity of existing and potential infrastructure is also an important factor.

3. This proposed allocation is adjacent to a shop, bus stop, chapel and public house. Safe walking and cycling routes link the village with the employment, education and retail facilities of Caernarfon only some 2km distant. It must be regarded as being in a sustainable location. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. I conclude that, read as a whole, the plan provides sufficient safeguard against the harm that would arise if, at the time a planning application was submitted, there was still insufficient sewage treatment capacity. On further consideration the LPA has proposed NAP 15 to reinstate the land as a housing allocation within the Development Boundary of Caeathro.

## **RECOMMENDATION**

**I recommend:**

**(REC.0747) that no modification be made to the DD in response to these objections and, in particular, that NA 265 be not accepted.**

## NEAR GLAN PERIS - CAERNARFON

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/14	Welsh Water		407

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/59/1	Ian Jones		
B/58/1	Gareth Jones		
B/548/1	A Kirk		
B/636/1	Evan Williams		
B/646/1	Beryl Carmallis		
B/632/1	W Owen		
B/339/1	C Pugh		

### Main Issue

- Whether the DD is appropriate, having regard to the availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

1. The DD proposes that 3.6ha of land near Glan Peris, Caernarfon, be allocated for the development of 80 dwellings of which 15% would be affordable homes. At Pre-inquiry Change stage, NA 233 proposes that the capacity be increased to 90 dwellings of which 35% would be affordable. An objector expresses doubt whether the necessary water supply, sewerage and sewage treatment services are available to support the development.

2. PPW (paragraph 2.5.3) advises that major generators of travel demand, such as housing, should be located within existing urban areas or in other locations which are or can be well served by public transport or can be reached by walking or cycling. In paragraph 9.2.9 it advises that, in deciding which sites to allocate for housing, an LPA should have regard to the location and accessibility of potential development sites to jobs, shops and services by modes other than the car. The capacity of existing and planned infrastructure is also an important factor.

3. The proposed allocation lies within the built-up area of Caernarfon within easy reach by sustainable transport modes of a wide range of retail, employment, educational and other necessary facilities. It is in a highly sustainable location. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. I conclude that, read as a whole, the plan provides sufficient safeguard against the

harm that would arise if, at the time a planning application was submitted, there was insufficient supporting infrastructure in place.

**RECOMMENDATION**

**I recommend:**

**(REC.0748) that no modification be made to the DD in response to this objection.**

**NEAR FRON DEG, MAESINCLA - CAERNARFON**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA266

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/1013/1	Mrs Ann Mather	Sally Boyce	68
B/1010/1	B. Allen	Sally Boyce	68
B/442/1	Margaret Jones		68
B/400/1	Mr & Mrs T Jones		68
B/396/1	David Pritchard		68
B/1027/1	Mrs M. Parry	Sally Boyce	68
B/436/1	K Tate		68
B/370/1	Alfred & Menai Sage		68
B/1017/1	Eluned Jones	Sally Boyce	68
B/454/1	M Walters		68
B/1021/1	Mrs R Williams	Sally Boyce	68
B/433/1	Y Jones		68
B/484/1	M Owen		68
B/439/1	Gwyneth Ashley		68
B/1018/1	Mrs Margaret Jones	Sally Boyce	68
B/374/1	L. Williams		68
B/1014/1	Valerie Lloyd	Sally Boyce	68
B/376/1	Bessie Williams		68
B/628/1	Cledwyn Peters		68
B/388/1	O. Walter		68
B/448/1	Darryll Jones		68
B/798/1	Edwina Williams		68
B/434/1	Dawn Piddington		68
B/1038/1	Mrs Elizabeth Hughes	Mrs Myra Turner	68
B/451/1	D Jones		68
B/1015/1	M. Jones	Sally Boyce	68
B/367/1	Sheila Thorman		68
B/431/1	S MacDonald		68
B/470/1	David Wilkinson-Owen		68
B/441/1	Hugh Parry		68
B/506/1	Ellen Mills		68
B/408/1	William Jones		68
B/449/1	Rachel Pritchard		68
B/450/1	Gavin Owen		68
B/918/1	Mair H Ellis (Petition with 531 names)		68

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B/453/1	Susan Hughes		68
B/466/1	Tereza Griffiths		68
B/401/1	Mrs K Williams		68
B/445/1	Irene Evans		68
B/1007/1	Mrs Norma Griffith	Sally Boyce	68
B/471/1	Samantha Wilkinson-Owen		68
B/435/1	K McKensie		68
B/456/1	David Hughes		68
B/463/1	Helen Williams		68
B/464/1	Kevin Williams		68
B/473/1	John Jones		68
B/457/1	Catherine Hughes		68
B/477/1	Melanie Hughes		68
B/452/1	S Hibbert		68
B/469/1	B Hayward		68
B/514/1	T Riley		68
B/419/1	Gareth Jones		68
B/420/1	Beryl Hughes		68
B/430/1	E Hughes		68
B/365/5	Mrs N Griffith		68
B/409/3	W. Doughty		68
B/447/1	E Pritchard		68
B/1011/1	Marjorie Evans	Sally Boyce	68
B/465/1	G Davies		68
B/446/1	T Lloyd		68
B/467/1	Heather Hughes		68
B/455/1	Sioned Bee		68
B/438/1	Michael Williams		68
B/1016/1	Mair Jones		68
B/512/1	E Williams		68
B/368/1	William Brown		68
B/428/1	Helen Williams		68
B/413/1	Robert Humphreys		68
B/510/1	M Owen		68
B/651/1	A. Jones		68
B/503/1	J & E Jones		68
B/426/1	Victoria Rowlands		68
B/432/1	K Hughes		68
B/508/1	Rachel Pritchard		68
B/802/1	David Williams		68
B/375/1	Mary Jones		68
B/402/1	M Gardener		68
B/411/1	H Smee		68
B/412/1	D Rowlands		68
B/414/1	J Hughes		68
B/391/1	A Owen		68
B/1019/1	Terry Williams	Sally Boyce	68
B/492/1	Ellen Roberts		68
B/1012/1	Jopan Davies	Sally Boyce	68

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B/520/1	Mr & Mrs K Stringer & Schudlak		68
B/373/1	William Jones		68
B/427/1	Mrs Pepper		68
B/519/1	Sally Boyce (Arthritis Care)		68
B/409/1	W Doughty		68
B/394/1	S Lewis		68
B/365/3	Mrs N Griffith		68
B/1022/1	Denise Pechata	Sally Boyce	68
B/398/1	O Griffiths		68
B/423/1	D Hughes		68
B/365/1	Mrs N Griffith		68
B/422/1	A Williams		68
B/421/1	I Roberts		68
B/458/1	Keith Roberts		68
B/379/1	D Ruscoe		68
B/416/1	Ida Davies		68
B/424/1	M Morris		68
B/415/1	Annette Roberts		68
B/377/1	John Williams		68
B/378/1	Lynne Owen		68
B/389/1	Mark Kahn		68
B/518/1	Brenda Jones (Arthritis Care)		68
B/429/1	L Hughes		68
B/381/1	Brian & Katrina Sinclair		68
B/387/1	P.Bock		68
B/504/1	John Hughes		68
B/405/1	K Jones		68
B/397/1	Mr & Mrs EC Williams		68
B/385/1	Vivian Roberts		68
B/380/1	Irfon Lloyd		68
B/417/1	Owen Davies		68
B/507/1	John Spackman		68
B/392/1	Carol Roberts & Derek Roberts		68
B/383/1	J Jones		68
B/384/1	Valmai Lloyd		68
B/390/1	Wynne & Margaret Elizabeth Williams		68
B/410/1	Mr & Mrs Norman		68
B/472/1	Wilma Jones		68
B/1025/1	Mary Bieniek	Sally Boyce	68
B/443/1	Eleri Warrington		68
B/517/1	Lisa Pritchard		68
B/404/1	Brian Tilley		68
B/485/1	A Jones		68

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B/481/1	Darren O'Sullivan		68
B/483/1	Mr & Mrs K Back		68
B/482/1	Mr & Mrs G Sadler		68
B/406/1	Roberta Jones		68
B/502/1	V Jones		68
B/407/1	E Horton		68
B/372/1	Mandy & Ian Parry		68
B/488/1	Cheryl Morris		68
B/505/1	M Hughes		68
B/486/1	P Williams		68
B/513/1	Francis Roberts		68
B/754/1	Gloria & Bert Hanks		68
B/61/1	Mrs Gwyneth Lloyd		68
B/386/1	Sandra Griffiths		68
B/425/1	David Walters		68
B/460/1	Charlotte Joy		68
B/395/1	K Pritchard		68
B/1023/1	Hilda Davies	Sally Boyce	68
B/371/1	John Owen		68
B/490/1	D Le Bon		68
B/393/1	Enid P Pritchard		68
B/365/4	Mrs N Griffith		68
B/399/1	Valerie Rowlands		68
B/1020/1	Mrs Gaynor Williams	Sally Boyce	68
B/382/1	Gary Jones & Catherine Jones		68
B/487/1	D Williams		68
B/1024/1	Eluned Williams	Sally Boyce	68
B/495/1	J Hughes		68
B/489/1	L Williams		68
B/501/1	Heather Owen		68
B/491/1	Councillor Myfi & Mr K Powell-Jones	Mr D Hughes	68
B/496/1	Peter Hughes		68
B/462/1	N Humphreys		68
B/498/1	Mr & Mrs Hughes		68
B/493/1	Dennis Roberts		68
B/497/1	Iris Evans		68
B/500/1	William Owen		68
B/499/1	Mr & Mrs F Lovell		68
B/494/1	Stuart Michael & Salwen Sage		68
B/511/1	H Kelly		68

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/11	Welsh Water		407



B/747/1	Thomas Jones		68
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### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/509/1	P Griffith		
B/516/1	Jason Evans		
B/515/1	C Saunders		
B/418/1	E Davies		
B/403/1	Kevin Parry		
B/369/1	A Jones		
B/468/1	Nicola Pritchard		
B/479/1	Jenny Davies		
B/459/1	Mark Jones		
B/440/1	Wilfred Harris		
B/437/1	Marc Taylor		
B/461/1	Sharon Jones		
B/475/1	Dominic Caddick		
B/476/1	Lisa Jones		
B/478/1	Sioned Jones		
B/480/1	Andrew Taylor		
B/366/1	K Brown		

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/312/1	RJ & EP Owen		

### Main Issues

- The need for additional housing development at Caernarfon.
- The need to retain the day care centre for the elderly.
- The effect of development on the safe and free flow of traffic.
- The availability of necessary infrastructure and education services.
- The need for recreational facilities.

### Inspector's Considerations and Conclusions

#### *The need for additional housing development at Caernarfon*

1. The DD proposes that 1.68ha of land near Fron Deg, Maesincla, Caernarfon, be allocated for the development of 41 dwellings. Objectors argue that because there are sufficient unoccupied dwellings in Caernarfon there is no need for additional provision. A certain proportion of vacant dwellings is necessary in any area in order to provide the necessary flexibility to enable the private housing market to operate efficiently. In Wales as a whole some 4% of dwellings were vacant at the time of the 2001 census. In Caernarfon the equivalent figure was only 2.9%. Because it is needed to enable the housing market to function the vacant capacity can not be relied upon to meet need for additional dwellings. Because of the relatively low percentage of dwellings which are vacant in this area, there is

certainly no spare capacity within that resource. Further allocations of land must be identified to meet need. This area of previously developed land, situated within the built-up area of Caernarfon, within easy access of a wide range of necessary services and facilities by sustainable transport modes, satisfies the advice of PPW (paragraph 2.5.3) in this respect.

*The need to retain the day care centre for the elderly*

2. Part of the proposed allocation is occupied by a day care centre for the elderly. Objectors argue that it should be retained. The LPA agrees and, via NA 266, proposes to delete the part of the allocation that accommodates this. The land which would continue to constitute the allocation would have an area of 0.98ha and a capacity of 29 dwellings. The day care centre is an essential element of local social infrastructure. Its retention within the substantial settlement of Caernarfon minimises the overall distance that must be travelled in order to gain access to it. I conclude that the retention of the day care centre, via the proposed change, contributes to the maintenance of a sustainable pattern of settlement.

*The effect of development on the safe and free flow of traffic*

3. Objectors refer to on-street car parking in the vicinity of the site and to the local congestion that results from it. They argue that the traffic generated by additional dwellings would exacerbate this. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the traffic flow that is likely to result or that adequate improvements can be made to this.

*The availability of necessary infrastructure and education services*

4. Objectors argue that the infrastructure services of the locality are at capacity. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. I conclude that the plan, read as a whole, provides sufficient safeguard against the harm that would arise if, at the time a planning application was submitted, there was insufficient supporting infrastructure in place. Objectors argue that local schools are already overcrowded. The Local Education Authority confirms, however, that the local primary school has spare capacity.

*The need for recreational facilities*

5. Objectors argue that any residential development on this land should incorporate suitable play space for children. The plan is to be read as a whole. Policy CH41 provides that new housing development of 10 or more dwellings will normally be required to provide suitable open space and outdoor playing spaces.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0749) that the DD be modified by the acceptance of proposed Pre-inquiry Change NA 266 and the related NA 233 insofar as it relates to the land near Fron Deg, Maesincla, Caernarfon;**

**(REC.0750) that no other modification be made to the DD in response to these objections.**

## NEAR LLANBEBLIG CEMETARY - CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/15	Welsh Water		605

### Main Issue

- Whether the DD is appropriate, having regard to the availability of the necessary infrastructure.

### Inspector's Considerations and Conclusions

1. The DD proposes that 4.1ha of land near Llanbeblig Cemetery, Caernarfon, be allocated for the development of 100 dwellings. The objector expresses doubt whether the necessary water supply, sewerage and sewage treatment services are available to support the development.

2. PPW (paragraph 2.5.3) advises that major generators of travel demand, such as housing, should be located within existing urban areas or other locations which are, or can be, well served by public transport or can be reached by walking or cycling. In paragraph 9.2.9 it advises that, in deciding which sites to allocate for housing, an LPA should have regard to the location and accessibility of potential development sites to jobs, shops and services by modes other than the car. The capacity of existing and planned infrastructure is also an important factor.

3. The proposed allocation lies immediately adjacent to the edge of the built up area of Caernarfon within easy reach by sustainable transport modes of a wide range of retail, employment, educational and other necessary facilities. It is in a highly sustainable location. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. I conclude that, read as a whole, the plan provides sufficient safeguard against the harm that would arise if, at the time a planning application was submitted, there was insufficient supporting infrastructure in place.

### RECOMMENDATION

I recommend:

**(REC.0751) that no modification be made to the DD in response to this objection.**

## FORMER YSGOL SYR HUGH OWEN SITE - CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/969/13	Welsh Water		605

### Notes

- Objection B/969/13 is responded to in LPA proof 407, not 605.
- This allocation is subject to NA 233 and NAP 16.

### Main Issue

- Whether the DD is appropriate, having regard to the availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

1. The DD proposes that 1.6ha of land at the former Ysgol Syr Hugh Owen site, Caernarfon, be allocated for the development of 30 dwellings. At Pre-inquiry Proposed Change stage the LPA, via NA 233, proposes that the site size be reduced to 0.5ha with a capacity of 16 dwellings. No reason is given for this change but no objection is recorded as having been made to it. I will, therefore, proceed on the basis that the details presented via NA 233 represent the limits of the developable area of the site.

2. The LPA, via Further Proposed Change NAP 16 proposes to reduce the capacity of the allocation to 10 units. Again no reason is given for this change. This Further Change has not been the subject of public consultation and the full debate on its merits has not been possible. If the LPA considers this Further Change to be appropriate it should pursue it at modification stage.

3. An objector expresses doubt whether the necessary water supply, sewerage and sewage treatment services are available to support the development. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or other locations which are or can be well served by public transport or can be reached by walking or cycling. In paragraph 9.2.9 it advises that, in deciding which sites to allocate for housing, an LPA should have regard to the location and accessibility of potential development sites to jobs, shops and services by modes other than the car. The capacity of existing and planned infrastructure is also an important factor.

4. The proposed allocation lies within the built-up area of Caernarfon within easy reach by sustainable transport modes of a wide range of retail, employment,

educational and other nearby facilities. It is in a highly sustainable location. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure. I conclude that, read as a whole, the plan provides sufficient safeguard against the harm that would arise if at the time a planning application was submitted there was insufficient supporting infrastructure in place.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0752) that the DD be modified by the acceptance of NA 233 as it applies to this site;**

**(REC.0753) that no other modification be made to the DD in response to this objection.**

## NEAR SCHOOL - DEINIOLEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/916/1	Victoria Terrace Residents (petition with 19 names)		331
B/913/1	Petition from Pentre Helen with 30 names		331

### Main Issues

- The need for housing land at Deiniolen.
- The effect of development on the safe and free flow of traffic.
- The availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

#### *The need for housing land at Deiniolen*

1. The LPA proposes at DD stage that 2.46ha of land near to the school at Deiniolen be developed by the erection of 12 dwellings. Objectors argue that there is no need for new houses in Deiniolen to meet the needs of first time buyers. PPW (paragraph 9.2.4) advises that normally there should be no restriction on the occupancy of market housing. No robust evidence has been provided to justify a departure from this advice at Deiniolen. I conclude that the houses to be constructed on the allocated site should be available to all categories of occupier.

#### *The effect of development on the safe and free flow of traffic*

2. Objectors argue that additional housing development would increase local traffic and result in hazard and congestion. They are, in particular, concerned that the highway which links the site to the village primary school lacks a pavement. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result, or that new and adequate improvements can be made to accommodate it.

#### *The availability of necessary infrastructure*

3. Objectors argue that development of the proposed allocation would exacerbate existing problems relating to the disposal of surface water. The plan is to be read as a whole. Policy CH16 provides that development proposals will be

refused unless there is an adequate provision of necessary infrastructure to serve it.

**RECOMMENDATION**

**I recommend:**

**(REC.0754) that no modification be made to the DD in response to these objections.**



**REAR TALARDD - DINAS**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/199/1</b>	<b>AJ Clarke</b>		

## NEAR THE SCHOOL INTERSECTION, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA278

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/911/9	WDA		364

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/924/2027	Lord Newborough	Guy D Evans	364

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/911/2018	WDA		364

### Main Issue

- Whether the DD should be modified to include within the Development Boundary for Groeslon the land near the school intersection, and to allocate this for housing development, having regard to the effect on the character and appearance of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at Pre-inquiry Change stage, proposes, via NA 278, that 0.3ha of land adjacent to the school at Groeslon be included within the Development Boundary of the Village and allocated for the development of 7 dwellings. An objector, while not opposing the extension of the Development Boundary and the allocation of additional housing land in principle in this village, argues that development in the proposed location would not be sympathetic to the logical extension of the settlement. He refers to constraints on this site but does not specify their nature. He argues that the site is not large enough to support the comprehensive housing allocation that the settlement justifies.

2. The site abuts existing residential development on three sides and its development would be perceived as a consolidation of the settlement rather than as an intrusion into its rural setting. It is within easy walking distance of the village school, the post office/shop and the bus route to Caernarfon. The village as a whole contains a wide variety of residential developments, ranging from individual houses and bungalows to short and medium terraces and small estates. There is

every reason to suppose that a residential layout could be devised that would complement the existing urban form. For these reasons I conclude that the development of the proposed allocation would reinforce the established character and appearance of the village.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0755) that the DD be modified by the acceptance of NA 278;**

**(REC.0756) that no other modification be made to the DD in response to these objections.**

## NEAR GWESTY VICTORIA, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/844/22	CPRW		367
B/1326/1	Coronet Holidays Ltd		367

### Main Issues

- The effect of the allocation on the character and appearance of Llanberis.
- The scope for alternative uses of the land.

### Inspector's Considerations and Conclusions

*The effect of the allocation on the character and appearance of Llanberis*

1. The LPA at DD stage proposes that 0.5ha of land near Gwesty Victoria, Llanberis, be developed by the erection of 13 dwellings. An objector notes that this site lies in a detached part of the Development Boundary of this Local Centre between the Royal Victoria Hotel and the development at Pentre Castell to the east. He regards this as an isolated pocket of development, separated from the consolidated built-up area of Llanberis. He argues that the proposed housing allocation would, effectively, reinforce a ribbon of development in the open countryside adjacent to the boundary of the National Park and near to a significant belt of woodland and to Dolbadarn Castle. He argues, for these reasons, that the Development Boundary should be removed from the Royal Victoria Hotel and the area up to and including Pentre Castell and that the proposed housing allocation should be deleted.

2. Llanberis is classified as a Local Centre because it provides a range of services, including educational and retail facilities and good public transport links to Caernarfon. The proposed allocation is within walking distance of these and must be regarded as being in a sustainable location. Although the Royal Victoria Hotel and adjacent areas is encapsulated by a Development Boundary that is separated by a gap from that enclosing the remainder of Llanberis, there is, in fact, a belt of prominent and continuous development within that gap which links the hotel to the main body of the settlement. The development in this gap comprises the station buildings of the Snowdon Mountain Railway and the terraces of dwellings in the vicinity of Victoria Terrace. The hotel is seen in the same context as these structures. In particular it is perceived as part of the busy complex around the station. Given the location of the development at Pentre Castell, development of the proposed allocation would not extend the settlement into the open countryside in visual terms. Instead it would consolidate a gap within the existing built-up area. For these reasons I conclude that it would not cause demonstrable harm to the

character and appearance of the settlement and should remain as an allocation within the plan.

*The scope for alternative uses of the land*

3. An objector, while supporting the proposed housing allocation and expressly not wishing this to be removed, argues that in his duly made objection he sought the designation of the land as a 'Redevelopment Site' so that it has the potential for residential and/or tourism-related development. I note, however, that the duly made objection makes no mention of a proposed 'Redevelopment Site' allocation of this land.

4. Pre-inquiry Proposed Change NA 153 to policy CH1 seeks to remove the DD presumption against developing housing allocations for any use other than housing. If my recommendation in relation to this policy is accepted the modified version would allow the scope for this objector to pursue alternative schemes at planning application stage even if the housing allocation was to remain. There is, therefore, no need to modify the plan in the way suggested.

**RECOMMENDATION**

**I recommend:**

**(REC.0757) that no modification be made to the DD in response to these objections.**

## NEAR MAES PADARN, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos: 284

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1207/1	Elizabeth Huws		85

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/972/2006	Dr Morris	Jan Tyrer	85

### Main Issues

- The effect of development on the character and appearance of Llanberis.
- The scope for providing a satisfactory vehicular access.

### Inspector's Considerations and Conclusions

*The effect of development on the character and appearance of Llanberis*

1. The DD proposes the allocation of 0.65ha of land near Maes Padarn, Llanberis, for the development of 20 dwellings. At Pre-inquiry Proposed Change stage the LPA proposes, via NA 284, to exclude this land from the Development Boundary and delete the housing allocation. An objector argues that the site is part of a wider belt which retains a rural aspect at the very edge of the settlement. A further objector argues that the land is within the built-up area and the urban/rural interface is some distance away at the point where the higher ground begins.

2. PPW (paragraph 9.2.9) advises that, in allocating land for housing, regard should be had, among other things, to the location of fragile landscapes and the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development.

3. The site is an area of grassland which forms part of an undeveloped area between the densely developed and formally laid out housing estate of Maes Padarn to the east and the sporadic residential development along Church Lane to the west. Due to the density and layout of Maes Padarn, that area is clearly part of the consolidated built-up area of Llanberis. The development along Church Lane is of a completely different nature, consisting of a sequence of large dwellings on substantial plots at irregular intervals along the highway. Due to the presence of many mature trees along Church Lane and the density of foliage in the large gardens, this belt of development, together with the open land between it and

Maes Padarn (which contains the proposed allocation), forms in my view part of the semi-rural setting of Llanberis. Development on the land which is proposed for allocation would extend the settlement into this area, unacceptably eroding the spacious character of this part of the urban fringe.

4. Llanberis is tightly constrained by its surrounding topography and the high visual quality of the adjacent areas. These make it very difficult to identify suitable sites for new housing. The degree of harm to the tranquil character of this particular area is, however, in my view sufficient in its own right to justify the opposition to its development. For these reasons I agree with the LPA the view, at Pre-inquiry Proposed Change stage, that this land should be removed from the Development Boundary and deleted from the housing allocation.

*The scope for providing a satisfactory vehicular access*

5. The northern edge of the proposed allocation abuts Church Lane. This is a narrow winding road which lacks pavements. The Local Highway Authority regards this highway as unsuitable to support the traffic generated by 20 additional dwellings. The only other potential access would be across land which is not under the control of the site owner. Policy CH31 advises that development proposals will be approved only if provision can be made for a safe vehicular access and if the existing road network is of a standard to deal with the expected traffic. This consideration is not, therefore, sufficient to justify deletion of the allocation because a particular scheme of development might overcome these problems.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0758) that the DD be modified by the acceptance of proposed Pre-inquiry Change NA 284;**

**(REC.0759) that no other modification be made to the DD in response to these objections.**

## NEAR MAES GWYDION, LLANDWROG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA287

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1218/6	Llandwrog Community Council		62

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/198/2006	JP Pollard		62

### Main Issues

- The pattern of settlement at Llandwrog.
- The nature of the potential occupiers of the dwellings.

### Inspector's Considerations and Conclusions

#### *The pattern of settlement at Llandwrog*

1. The DD proposes that 0.3ha of land near Maes Gwydion, Llandwrog, be included within the Development Boundary of the Village and allocated for the development of 7 dwellings. At Pre-inquiry Proposed Change stage the LPA, via NA 287, proposes to exclude the land from the Development Boundary and delete the housing allocation. An objector considers this to be unjustified because the LPA, at DD stage, had considered this a suitable area for development.

2. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. The proposed allocation would abut developed land only on its south and east sides. It would extend the village into the open countryside and erode its rural setting at a prominent location adjacent to one of the principal approach roads to the settlement. In my view this would unacceptably increase the visual intrusion of urban land uses within an entirely open rural landscape. The allocation cannot, for this reason, be considered to be well related to the existing pattern of settlement.

#### *The nature of the potential occupiers of the dwellings*

3. An objector expresses the view that any new dwellings on this site should be for young local people rather than retirement properties for the elderly. PPW (paragraph 9.2.4) provides that normally there should be no restriction upon the occupancy of market housing. No robust evidence has been presented to justify a departure from this advice in this case.



**RECOMMENDATIONS**

**I recommend:**

**(REC.0760) that the DD be modified by the acceptance of NA 287;**

**(REC.0761) that no other modification be made to the DD in response to these objections.**

## NEAR BRYN LLAN - LLANDWROG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA286; NA288

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/82/1	Robert Isaac Jones		254
B/924/22	Lord Newborough	Guy D Evans	62

### Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/198/2005		JP Pollard		62
B/924/2030		Lord Newborough	Guy D Evans	254

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection No	Ref	Name of Objector	Agent	Response Ref
B/969/2026		Welsh Water		62

### Supporters of Proposed Change

Ref. No	Name	Agent	Response Ref.
B/924/2029	Lord Newborough	Guy D Evans (Carter Jonas)	
B/756/2137	Environment Watch Wales & the Borders		
B/1353/2001	Tudur & Tegwen Jones		
B/1354/2001	Nansi Jones		

### Main Issue

- Whether the DD should be modified to incorporate the proposed housing allocation on land near Bryn Llan and to exclude from the Development Boundary the land near to Pen y Bryn, Llandwrog, having regard to the effect of development on the settlement pattern.

## Inspector's Considerations and Conclusions

1. In response to objections made at DD stage, the LPA via, NA 286, proposes to include within the Development Boundary of Llandwrog, 0.33ha of land near Bryn Llan and allocate this for the construction of 7 dwellings. By means of NA 288 it also proposes to exclude from the Development Boundary an area of unallocated land near Pen y Bryn.
2. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. The land near Bryn Llan is enclosed on three sides by existing residential development. Its inclusion within the Development Boundary and its allocation for housing would result in a consolidation of the built-up area of the Village. New houses upon it would not intrude into the surrounding rural landscape. The village has a wide range of community services and amenities. This site is, in my view, an opportunity to reinforce a sustainable settlement without causing demonstrable harm to the rural setting of the Village.
3. The DD (paragraph 1.3.46) confirms that the purpose of Development Boundaries is to restrict development to sites that are within settlements so as to regulate development and protect the countryside. Policy CH3 provides that, in principle, proposals to build dwellings on undesignated sites within the Development Boundaries of villages will be approved provided specified criteria are satisfied.
4. At DD stage a part of two fields near Pen y Bryn, adjacent to the western edge of the Village, were proposed to be included within the Development Boundary. An objector argues that the whole of these two fields should be included within this and be allocated for housing. This land lies on rising ground and development upon it would be clearly seen from distant public vantage points. The village is, at present, very largely encapsulated within the adjacent undulating landscape. Development of this land would breach this natural setting and be perceived as an intrusion of incongruous uses into the rural landscape. The extent of this harm, in my view, outweighs the benefits to be derived from the promotion of development in a relatively sustainable location.

## RECOMMENDATIONS

**I recommend:**

**(REC.0762) that the DD be modified by the acceptance of NA 286 and NA 288;**

**(REC.0763) that no other modification be made to the DD in response to these objections.**

## NEAR GLAN ABER – LLANLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA289

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/198/4	JP Pollard		373

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2027	Welsh Water		373

### Main Issue

- Whether the DD should be modified to incorporate the proposed housing allocation on land near to Glan Aber, Llanllyfni, having regard to the extent to which an identified constraint can be overcome.

### Inspector's Considerations and Conclusions

1. The LPA, at Pre-inquiry Change stage, in response to a now unconditionally withdrawn objection, proposes via NA 289 to include within the Development Boundary 0.42ha of land near to Glan Aber, Llanllyfni and allocate it for the development of 12 dwellings. An objector refers to a sewer that crosses the site and argues that this would have to be re-directed or an easement allowed for in any development scheme.

2. PPW (paragraph 9.2.3) advises that housing land identified via a development plan must be free or easily freed from constraints. The re-routing and/or protection of public utilities is a routine aspect of the development process. There is no reason to believe that it cannot be achieved in this case.

### RECOMMENDATIONS

I recommend:

**(REC.0764) that the DD be modified by the acceptance of NA 289;**

**(REC.0765) that no other modification be made to the DD in response to this objection.**

## OPPOSITE TREFLAN - LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/251/2	D Evans (DE Development)		381

### Main Issues

- The effect of development on the pattern of settlement.
- The effect of development on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

#### *The effect of development on the pattern of settlement*

1. The LPA proposes, at DD stage, to allocate 0.4ha of land opposite Treflan at Llanrug, for the development of 9 dwellings. The objector argues that it would cause ribbon development and that another site which he identifies should be allocated for housing as an alternative. PPW (paragraph 9.3.1) advises that new housing development should be well integrated and connected to the existing pattern of settlement. The expansion of villages should, among other things, avoid creating ribbon development. The allocation opposite Treflan in-fills a gap along the frontage of a highway which is already subject to ribbon development. It would not extend the ribbon, however, but would secure the development of land within an area which already has a distinctly built-up character. For this reason it is well integrated with and connected to the existing pattern of settlement and should be retained as an allocation.

2. In contrast the land proposed for allocation by the objector adjacent to the highway known as Afon Rhos projects beyond the established edge of the village into an entirely open rural landscape. It would breach a clearly defined linear urban edge at this point and erode the rural setting of the village. For these reasons it cannot be regarded as an acceptable substitute for the allocated site.

#### *The effect of development on the safe and free flow of traffic*

3. The objector argues that the road system serving the proposed allocation opposite Treflan is incapable of accommodating the additional vehicular movements that would be generated. He refers, in particular, to the narrowness of the carriageway and available visibility given the profile of the road. The Local Highway Authority disagrees and expresses the view that the site could be developed without harm to the safe and free flow of traffic. In any case the UDP is to be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of a sufficient standard to deal with

the traffic that is likely to result from a development or if it can be improved to accommodate this.

**RECOMMENDATION**

**I recommend:**

**(REC.0766) that no modification be made to the DD in response to this objection.**

## NEAR PENNANT – LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA293

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/41	CPRW		179
B/788/1	Anthony V & Shirley Jones & Anthony TL & Linda C Jones		179
B/691/1	Anthony Vaughan Jones		179
B/194/1	ATL & LC Jones		179
B/349/1	Dafydd Pritchard		179

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/868/1	Alun Williams		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2140	Environment Watch Wales & the Borders		112
B/1661/2003	Llanrug Community Council		179

### Main Issues

- The effect of development on the character and appearance of Llanrug.
- The effect on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

*The effect of development on the character and appearance of Llanrug*

1. The DD proposes that 0.6ha of land near to Pennant, Llanrug, be allocated for the development of 6 dwellings. At Pre-inquiry Proposed Change stage, via NA 233, it proposes that this total be increased to 8 units. No objection was made to this. Llanrug contains a range of facilities and services including shops, a post office, junior school, secondary school, public house and Chapel together with

access to bus services which connect it to Caernarfon and Bangor. It is, therefore, a relatively sustainable location capable of accommodating some further housing development. No suitable previously developed land has been identified within the Village. In accordance with the advice of PPW (paragraph 9.2.8) a settlement extension is the next most sustainable option. An objector argues that the development of this green-field site would extend the settlement into the open countryside, unacceptably eroding its rural setting. The site is directly bounded by residential development on two of its four sides. On the third is a main road with a sporadic group of dwellings on the opposite side. In visual terms the development of this land would consolidate the settlement rather than introduce incongruous structures into the open rural landscape. For these reasons I conclude that development of this land would not cause demonstrable harm to the character and appearance of the village.

*The effect on the safe and free flow of traffic*

2. The LPA proposes that the allocation would gain its vehicular access directly onto the A4086 road which links Caernarfon to Llanberis. Objectors argue that this road accommodates a constant stream of traffic and has a record of accidents near to the site. Due to its alignment, the presence of existing vehicular accesses on the opposite side of the road and the presence of parked cars at the kerbside, is said to be an unacceptable location for a new access.

3. The Local Highway Authority is not aware of the history of road accidents referred to by objectors. It is satisfied that a safe vehicular access can be provided to the site. The road at this point is subject to a 40mph speed limit. To ensure the creation of a safe vehicular access visibility over a major road distance of 120m must be available. This can be secured if a small area of additional land is included within the Development Boundary to the west of the allocation. The LPA proposes NA 293 to secure this. The necessary area is within the same ownership as the proposed allocation. There is, therefore, a reasonable prospect that it can be developed in association with it.

4. In any case the UDP is to be read as a whole. Policy CH31 provides that development proposals will be approved only if a safe vehicular access can be provided. This secures an adequate safeguard against the harm that would arise if, at the time a planning application was submitted, the necessary arrangements for a safe access were not in place. I conclude, for these reasons, that the land can be allocated for housing development without the prospect of demonstrable harm to the safe and free flow of traffic.

5. Objectors argue that the capacity of the allocation should be reduced to only 2 dwellings in order to limit the impact of a vehicular access on the adjacent highway. This would result in a very low residential density which would be incompatible with the advice of PPW (paragraph 9.2.12). It is not, in any case, necessary for the reasons I have given.

6. An objector argues that, as an alternative to access to the A4086, a vehicular access should be provided from Minffordd Road. Having regard to the provisions of policy CH31 this is not necessary. It would, furthermore, introduce a measure of uncertainty into the prospect for development because it would require the co-operation of several different landowners.



7. An objector argues that extending the Development Boundary to take part of the adjacent field would enhance the prospects that the remainder of this would be developed at some stage in the future. The remainder of the field would lie outside the Development Boundary however and there would be a presumption against its development. An objector advocates the development of a potential housing site at Glanllyn on Minffordd Road as an alternative to the DD allocation. The merits of this are considered in the section of this report which relates to the omission of housing land allocations in Caernarfon DCA.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0767) that the DD be modified by the acceptance of NA 293;**

**(REC.0768) that no other modification be made to the DD in response to these objections.**

**NEAR ST HELEN CHURCH, PENISARWAUN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA295

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/833/1	M & FL Jones		387
B/714/1	J Jones		387
B/1221/1	Mark Jones & Ffiona Jones		387

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/252/1	Phyllis Ellis		387

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/218/1	David Phillips		
B/217/1	Shirley Jones		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/315/20 09	Llanddeiniolen Community Council		387

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/713/2004	Michael Wyn Jones		

**Note**

- Representations B/833/1 and B/1221/1 are classified by the LPA as supporters.

**Main Issue**

- Whether the DD is appropriate, having regard to the ownership constraint to development.

## **Inspector's Considerations and Conclusions**

1. At DD stage the LPA proposes that 0.3ha of land near St Helen's Church, Penisarwaun be allocated for the development of 8 dwellings. Subsequently the owner of the land confirmed that he would not make it available for that number and he would permit only a maximum of 4 to be built. This would result in a development at the very low density of 13dph contrary to the advice of PPW (paragraphs 9.2.12 and 9.1.2) that LPA's should promote the most efficient use of land. This is a circumstance where the LPA is unable to ensure that the land is free or readily freed from an ownership constraint, contrary to the advice of PPW (paragraph 9.2.3). It should not, therefore, be allocated for housing development. The LPA proposes, via NA 295, to delete the housing allocation and adjust the Development Boundary to exclude part of this site. In conformity with my recommendation in the section of this report which relates to affordable housing the Development Boundary of this settlement should be re-drawn so that it follows the actual edge of the consolidated built-up area . This would require the exclusion of the whole site from the Development Boundary.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0769) that the DD be modified by the acceptance of NA 295 as further modified to secure the exclusion of the whole site from the Development Boundary;**

**(REC.0770) that no other modification be made to the DD in response to these objections.**

## REAR LLYS Y GWYNT - PENISARWAUN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA296

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/557/1	E Jones		386

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/969/2028	Welsh Water		386

### Main Issue

- Whether the DD is appropriate, having regard to the capacity of the housing land resource and the mechanism for the provision of housing to meet local needs.

### Inspector's Considerations and Conclusions

1. The DD proposes that land adjacent to Llys y Gwynt, Penisarwaun, be excluded from the Development Boundary of the Village. The objector expresses the view that little of the land allocated for housing in the DD is likely to be available to meet need. As a consequence he argues that it is necessary to extend the Development Boundary of Penisarwaun to include land adjacent to Llys y Gwynt in order to allow the development of dwellings to meet local needs. The LPA proposes, via NA 296, to extend the Development Boundary and allocate land for housing there.

2. For the reasons I give elsewhere in this report I have concluded that the proposed housing allocations, together with the capacity of committed sites and the reasonable expectation of dwellings arising on small and windfall sites, is sufficient to satisfy the identified need for the plan period for the UDP area as a whole. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or in other locations which are or can be well served by public transport. No information has been provided to demonstrate that the public transport facilities available to Penisarwaun are of such a scale that this small isolated village can be described as well served. It is not, therefore, a place where any significant priority should be given to the allocation of land for housing.

3. PPW (paragraph 9.2.4) advises that, normally, market housing should not be subject to an occupancy restriction, e.g. to meet the needs of local people only. I have not been provided with the robust evidence needed to justify any departure from this guidance. It is not, therefore, appropriate for any part of this area to be

allocated for housing to meet this particular need which is the only one identified by the objector. If such local need exists and requires the construction of affordable dwellings the UDP, via policy CH6, already provides the framework within which that can be satisfied by means of the development of Rural Exception Sites immediately adjacent to the Development Boundary of settlements. Retaining the Development Boundary of Penisarwaun on the alignment shown in the DD would allow such a scheme to be undertaken on the land adjacent to Llys y Gwynt if this met the criteria of that policy.

4. For these reasons I conclude that the land adjacent to Llys y Gwynt should not be included within the Development Boundary of Penisarwaun. No part of it should therefore be allocated for housing development as is proposed by NA 296.

## **RECOMMENDATION**

**I recommend:**

**(REC.0771) that no modification be made to the DD in response to this objection and, in particular, that NA 296 be not accepted.**

**NEAR FOOTBALL GROUND - PENYGROES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA304

This Section is subject to Further Proposed Changes Nos: NAP26

**Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/824/3	Dafydd Williams		167
B/316/1	Welsh Language Society		167
B/1210/1	Ms S Morton		167
B/732/1	Debra Eckley		167
B/876/3	Beryl Fretwell		167
B/361/1	Mr & Mrs E Jones		167
B/556/1	Friends of the Earth Gwynedd		167
B/152/1	David Cooper		167
B/109/3	Richard Williams		167
B/154/1	Sue Cooper		167
B/746/1	Frances Smith		167
B/107/1	Owain Rowlands		167
B/689/1	Mr WH & NE Parry		167
B/100/1	Mr & Mrs Tudor Roberts		167
B/675/1	Neville Ellis		167
B/551/1	Cyngor Cymuned Llanllyfni		167
B/647/1	Mr & Mrs RC Jones		167
B/682/1	Mrs Glenys Khan		167
B/650/1	Sharon Roberts Sibson		167
B/917/1	Gwyneth Parry (petition)		167
B/1037/1	Penygroes Residents (petition with 200 names)		167
B/686/1	Gwyneth Parry		167

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/134/3	Richard Sibson		167
B/134/1	Richard Sibson		167
B/1009/1	Mrs Eva Roberts	Mrs Sharon Sibson	167

**Unconditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/110/3	John Davies		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/108/1	Jean Roberts		
B/103/1	Gwilym Jones & Mair Wynne Roberts		
B/90/1	Iwan Williams		
B/115/1	Carol & Colin Francis		
B/94/1	K Bowness		
B/80/1	Eleri Owen		
B/109/1	Richard Williams		
B/102/1	Llion Williams		
B/110/1	John Davies		
B/91/1	William Davies		
B/105/1	Claire Morgan Coles & Rhodri Gwyn Williams		
B/92/1	Bethan Williams		
B/98/1	Geraint Bowness		
B/106/1	Ian Jones		
B/104/1	Iwan Williams		
B/101/1	Catrin Williams		
B/93/1	Dilys Davies		
B/96/1	Alun Bowness		
B/97/1	Gwennie Williams		
B/99/1	Delyth Jones		
B/95/1	Ffion Williams		
B/89/1	Iola Huws		
B/779/1	Elwyn Jones-Griffith		
A/111/1	Richard Wyn Huws		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of objector	Agent	Response Ref
B/551/2004	Llanllyfni Community Council		167
B/779/2007	Elwyn Jones-Griffith		167
B/671/2006	Richard Huws		167

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/650/2003	Sharon Roberts Sibson		
B/134/2004	Richard Sibson		
B/1009/2003	Mrs Eva Roberts		
B/756/2147	Environment Watch Wales & the Borders		
B/773/2046	Chris Wynne		

### Notes

- Objections B/110/1 and B/110/3 are now made by the personal representatives of the late John Davies.
- Objection B/773/40 is dealt with in this section of the report.

### Main Issues

- The number of dwellings proposed.
- The need for affordable housing.
- The effect on the linguistic character of Penygroes.
- The effect on the character and appearance of Penygroes.
- The effect on the safe and free flow of traffic.
- The availability of school places.
- The effect of development on residential amenity.
- The effect on nature conservation interests.

### Inspector's Considerations and Conclusions

#### *The number of dwellings proposed*

1. At DD stage the LPA proposes that 3.2ha of land near the football ground at Penygroes be allocated for the development of 80 dwellings. Via NA 304 it proposes that the site be reduced to about half that size with a capacity of 40 dwellings. Then via Further Proposed Change NAP 26 it proposes that the full area identified in the DD continue to be allocated but that the capacity be reduced to 74 units.

2. Objectors argue that the allocation would introduce too great a number of new dwellings to Penygroes. PPW (paragraph 2.5.3) advises that major generators of travel demand, such as housing, should be located within existing urban areas or in other locations which are or can be well served by public transport or can be reached by walking or cycling. As a Local Centre with a good range of shops, schools, community and sports facilities and employment opportunities, Penygroes is such a place. These factors are reinforced by the accessibility by public transport of the settlement to employment opportunities and services in Caernarfon. The DD proposes that the development of this allocation would be phased, thereby



providing the opportunity for the facilities of the Local Centre to adjust to the impact of new houses. There is, therefore, no reason to conclude that the development of this site would be out of scale.

*The need for affordable housing*

3. Objectors argue that there is a need for more affordable dwellings in Penygroes. PPW (paragraph 9.1.2) advises that LPAs should promote mixed tenure communities. Both market and affordable homes are required. As proposed at DD and Pre-inquiry Proposed Change stage the development of the allocated land would include the provision of a proportion of affordable dwellings which would not otherwise be constructed. In the absence of the allocation the existing demand for new housing, if unsatisfied, would lead to a general increase in local house prices. This would remove the prospect of a home even further from those on limited incomes. I conclude that the allocation of the land near the football ground will play a significant part in meeting the needs for affordable homes. In any case, policies CH3, CH5 and CH6 provide the framework by which new dwellings to meet needs for affordable housing can be provided within or adjacent to the Development Boundary of Penygroes to supplement those provided on this site.

*The effect on the linguistic character of Penygroes*

4. Objectors argue that the development of the proposed allocation would increase the number of non-Welsh speakers in Penygroes and that this would weaken cultural cohesion. The LPA has, on the basis of its research into the pattern of house purchases, identified Penygroes as a settlement in a post-industrial housing market area. In such settlements the majority of houses for sale are bought by persons who already live in Gwynedd. It is therefore reasonable to assume that the potential effect of a given number of new houses on the linguistic character of the plan area as a whole is likely to be less if they were developed at Penygroes than if an equivalent number were allocated elsewhere. By reason of the intrinsic nature of the settlement I conclude that the allocation of this site would minimise the adverse impact of development on Welsh language and culture in the plan area as a whole.

*The effect on the character and appearance of Penygroes*

5. Objectors are concerned that development of the proposed allocation would extend the settlement into the open countryside. Immediately to the north is a belt of development containing a substantial leisure centre and local schools. To the east and south is residential development. The development of this site would consolidate the existing built-up area but would not increase the prominence of the settlement as a whole from beyond its existing limits. For this reason I conclude that the new housing would be well integrated and connected to the existing pattern of settlement as PPW (paragraph 9.3.1) advises.

6. An objector argues that the eastern boundary of the allocation should be extended eastwards to align with the rear boundary of Bron Fedw. This would unacceptably increase the prominence of the site when viewed from that direction.

*The effect on the safe and free flow of traffic*

7. Objectors argue that additional housing development on the scale proposed would lead to local traffic congestion. The Local Highway Authority expresses the view that adequate capacity exists in the local highways system. It notes that this is proposed to be enhanced by the construction of a new section of highway to link the locality of the proposed allocation to the principal elements of the local highway network. The plan must, in any case, be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result or that adequate improvements can be made.

Objectors refer to a public footpath which crosses the site. Policy CH20 provides that development proposals will be refused if they lead to the loss of a public right of way, unless an acceptable alternative is provided.

*The availability of school places*

8. Objectors are concerned that local schools lack the capacity to serve the children of the occupiers of the new houses. The LPA confirms that there is sufficient capacity in local schools. In any case, policy CH35 provides that, in cases where educational needs cannot be accommodated at an existing school, planning conditions or obligations will be used to ensure that the developer provides or contributes towards the necessary facilities to meet these needs.

*The effect of development on residential amenity*

9. Objectors express concern that the proposed residential development would erode the living conditions of adjacent residents. Policy B22 provides that proposals that would have an unacceptable impact on the amenities of local communities will be refused.

*The effect on nature conservation interests*

10. Objectors refer to the nature conservation value of the site and argue that this should have priority over its residential development. The Council's Biodiversity Unit has confirmed that the site is on its register of Candidate Wildlife Sites which includes over 2000 areas within Gwynedd. At the time of the inquiry a decision had not yet been taken on whether or not to designate this land as a Wildlife Site. The effect of development on biodiversity is a material consideration. PPW (paragraph 5.4.4) advises that non-statutory designations such as Wildlife Sites do not preclude appropriate socio-economic activities. In this case I conclude that the opportunity to develop a significant number of dwellings in a location where they would have easy access by sustainable transport modes to a wide range of facilities and services, in a location which minimises potential harm to Welsh language and culture, outweighs the potential harm to biodiversity considerations.

*Overall conclusion*

11. For these reasons I conclude that the whole of the DD allocation should be retained within the plan. Various objectors suggest a reduction in the capacity of the site to some 50 or 60 dwellings. The LPA proposes, via NAP 26, that the

capacity be reduced from 80 to 74 dwellings to allow the retention of a stream that runs through the site and along its eastern boundary. However, the density of development at DD stage is only 25 dwellings per hectare. The maintenance of 80 dwellings on a slightly reduced area would not raise the density appreciably. Given the advice of PPW (paragraph 9.2.12) that higher densities should be encouraged on easily accessible sites, such as this one, I conclude that it is reasonable to accommodate at least 80 dwellings on this site.

## **RECOMMENDATION**

**I recommend:**

**(REC.0772) that no modification be made to the DD in response to these objections and, in particular, that neither NA 304 nor NAP 26 be accepted.**

## NEAR BRO LLWYNDU, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Ojector	Agent	Response Ref
B/316/3	Welsh Language Society		167
B/732/3	Debra Eckley		167

### Main Issue

- Whether the DD is appropriate, having regard to the scale and type of housing development to be accommodated within Penygroes.

### Inspector's Considerations and Conclusions

1. At DD stage the LPA proposes that 0.4ha of land near Bro Llwyndu be allocated for the development of 9 dwellings. The site is previously developed land within a Local Centre which provides a good range of retail, educational and employment opportunities within easy walking distance, together with good public transport links to the facilities of Caernarfon. It is the sort of sustainable site which is given priority for allocation by PPW (paragraphs 2.5.3 and 9.2.8). Objectors do not raise issues relating to the suitability of the site for housing development but argue that the plan should promote the development of affordable housing rather than market housing within Penygroes. I deal with this matter in the section of this report which relates to the proposed allocation of land Near the Football Ground at Penygroes. I conclude that, in accordance with the DD, the development of the proposed allocation near Bro Llwyndu would contribute to the provision of affordable housing in this settlement to an extent which is consistent with PPW advice.

### RECOMMENDATION

I recommend:

**(REC.0773) that no modification be made to the DD in response to these objections.**

## REAR CAE CAPEL BACH – PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA302

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/154/5	Sue Cooper		388

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1205/1	S Burgess	D L Hughes	167

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/779/2006	Elwyn Jones-Griffith		167
B/551/2005	Llanllyfni Community Council		167

### Main Issue

- Whether the DD should be modified to incorporate the proposed housing allocation of land to the rear of Cae Capel Bach, Penygroes, with regard to the nature of the adjacent land uses.

### Inspector's Considerations and Conclusions

1. In the DD plan the land to the rear of Cae Capel Bach, is proposed to lie outside the Development Boundary of Penygroes. By means of Pre-inquiry Proposed Change NA 302 the LPA, in response to an objection at DD stage, proposes to extend the Development Boundary to include 0.25ha of land and allocate it for the development of 6 dwellings.

2. The site is abutted on three sides by development. It is situated within easy walking distance of the retail, educational and employment opportunities available within Penygroes and also of the good public transport links to Caernarfon. It is the sort of sustainable site which is given priority for allocation by PPW (paragraphs 2.5.3 and 9.2.8). The Local Highway Authority confirms that satisfactory vehicular access can be gained via the recently developed residential estate of Cae Capel Bach.

3. Objectors argue that it is unlikely that market houses will be built on this site because it adjoins housing association dwellings. They also argue that affordable homes should not be built there because sufficient are already provided within Penygroes.

4. PPW (paragraph 9.1.1) advises that the WAG seeks to promote a mix of affordable and market houses within villages and towns. The juxtaposition of such dwellings would promote a pattern of settlement which maximises social inclusion. The views of the objectors on the adequacy of the existing supply of affordable housing are not supported by reasoned and quantified arguments. They are at variance with the conclusions of the research undertaken by the LPA and which is referred to in the section of this report which relates to affordable housing. I conclude that, in respect of both its location and adjacent uses, the allocation of this site would promote a sustainable pattern of settlement.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0774) that the DD be modified by the acceptance of NA 302;**

**(REC.0775) that no other modification be made to the DD in response to these objections.**

**REAR MAES Y MOR – PENYGRONES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA300

This Section is subject to Further Proposed Changes: NAP25

**Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/117/1	Clifford Evans		167

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of objector	Agent	Response Ref
B/1430/2001	David Alan Williams		167
B/1397/2001	Mrs Nancy Bee		167
B/1381/2001	John Alan Roberts		167
B/1402/2001	V Creek		167
B/1446/2001	Andrew Jones & Marie Williams		167
B/1410/2001	L Owen		167
B/1401/2001	Sion M. & Janice A Parry		167
B/1403/2001	Paul & Tracy Davies		167
B/1398/2001	Margaret Jones		167
B/1404/2001	Mr & Mrs Davies		167
B/1399/2001	Mary Thomas		167
B/1395/2001	Dilwyn Hughes		167
B/1422/2001	Frank G Baker		167
B/1400/2001	S Woods		167
B/1406/2001	Mr & Mrs E Lewis		167
B/1371/2001	Rina Amolia Williams		167
B/1444/2001	William Roger Thomas		167
B/1445/2001	G&J Williams		167
B/1447/2001	Dennis Wyn Jones		167
B/756/2145	Environment Watch Wales & the Borders		110

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<b>B/1466/2001</b>	<b>Andrew Jones &amp; Marie Williams</b>		<b>167</b>
<b>B/1470/2001</b>	<b>Mr Richard Jones</b>		<b>167</b>
<b>B/1409/2001</b>	<b>Margaret Williams</b>		<b>167</b>
<b>B/1405/2001</b>	<b>Moira G Jones</b>		<b>167</b>
<b>B/1351/2003</b>	<b>David Alan Williams</b>		<b>167</b>
<b>B/1352/2001</b>	<b>Andre &amp; Elinor Lambrecht</b>		<b>167</b>
<b>B/710/2003</b>	<b>W Evans</b>		<b>167</b>
<b>B/1408/2001</b>	<b>Karen Ann Jones</b>		<b>167</b>
<b>B/1407/2001</b>	<b>Mena Williams</b>		<b>167</b>
<b>B/1475/2001</b>	<b>Gareth &amp; Cheryl Jones</b>		<b>167</b>
<b>B/1415/2001</b>	<b>W Gwyn W Parry (Conditionally Withdrawn)</b>		<b>167</b>
<b>B/1414/2001</b>	<b>Mr &amp; Mrs DR Williams</b>		<b>167</b>
<b>B/1416/2001</b>	<b>Mr &amp; Mrs E Unwin</b>		<b>167</b>
<b>B/1417/2001</b>	<b>Gwenda Parry</b>		<b>167</b>
<b>B/1418/2001</b>	<b>Glenys Williams</b>		<b>167</b>
<b>B/1419/2001</b>	<b>Rona Jones</b>		<b>167</b>
<b>B/1421/2001</b>	<b>Alan &amp; Gwyneth Parry</b>		<b>167</b>
<b>B/1424/2001</b>	<b>Bethan L Roberts &amp; Michael Houghton</b>		<b>167</b>
<b>B/779/2004</b>	<b>Elwyn Jones Griffiths</b>		<b>167</b>
<b>B/671/2005</b>	<b>Richard Huws</b>		<b>167</b>
<b>B/671/2005</b>	<b>Richard Huws</b>		<b>167</b>
<b>B/551/2004</b>	<b>Llanllyfni Community Council</b>		<b>167</b>
<b>B/1640/2001</b>	<b>Dewi &amp; Margaret Rhys</b>		<b>167</b>
<b>B/1638/2001</b>	<b>Martyn Lewis</b>		<b>167</b>

**Supporters of Pre-Inquiry Proposed Change**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/844/2071</b>	<b>CPRW</b>		
<b>B/969/2030</b>	<b>Welsh Water</b>		



## Main Issue

- Whether the DD should be modified to incorporate the proposed housing allocation of land to the rear of Maes y Mor, Penygroes, having regard to the effect of development on the safe and free flow of traffic.

## Inspector's Considerations and Conclusions

1. In the DD plan the land near to the highway known as Maes y Mor, is proposed to lie outside the Development Boundary of Penygroes. An objector argues that the residential development of this land would effect less intrusion into the rural setting of the settlement than the DD allocation Near to the Football Ground. The LPA agrees and, via NA 300, proposes to extend the Development Boundary to include this land and to allocate this 1.5ha site for the development of 34 dwellings.

2. The site is enclosed by existing development on 3 sides. It would, in my view, have a limited visual impact on the rural setting of Penygroes, equivalent to that of the proposed allocation Near to the Football Ground. The Maes y Mor site would be nearer to the shopping centre of Penygroes than the site Near the Football Ground but the latter would be closer to the leisure centre and several schools. The two sites are virtually equivalent in their impact on the functioning of the settlement.

3. The LPA justified NA 300 on the basis that it was needed to compensate for the reduction of the size and capacity of that latter allocation via NA 304. I have, however, for the reasons I give in that section of this report, concluded that the whole of that DD allocation should remain. There is, therefore, no justification in quantitative terms for the allocation of the land at the rear of Maes y Mor.

4. The two sites differ in that the proposal at Maes y Mor is served by a highway of sub-standard width. This could be remedied only by the widening of Maes y Mor and the provision of parking spaces to provide an alternative to the on-street parking that, at present, limits the capacity of that highway. The necessary road widening would significantly reduce the size of an existing children's play area.

5. Even assuming that the highway of Maes y Mor could be suitably widened, and the cost of this did not render the development of the site unviable, the key difference between this and the site Near the Football Ground would remain the matter of their impact on the wider road network within Penygroes. The site Near the Football Ground would benefit from the construction of the Penygroes Southern Route, which would link the vicinity of that site to the southern end of Water Street, by which traffic could entirely bypass the shopping centre of the settlement. Even if this was not built the journey between the site and the A487 road would involve a much shorter journey via the shopping centre than that from Maes y Mor. From the latter, traffic would have to travel past the retail frontages of Snowdon Street to reach Water Street. The impact of this site on the safe and free flow of traffic in the congested retail centre of Penygroes would therefore be significantly greater.

6. An objector notes that it may be possible to create a vehicular access directly from the Maes y Mor site to the A487 road which runs some distance to the

west. The creation of a site access to an 'A' category road would raise technical issues which have not been addressed by objector or the LPA. I am, therefore, unable to attach weight to the possibility that such an access could be achieved.

7. For these reasons I conclude that the land to the rear of Maes y Mor should not be included within the Development Boundary of Penygroes or allocated for housing development. I note that this conclusion is consistent with Further Proposed Change NAP 25 which seeks to revert to the situation in the DD plan.

## **RECOMMENDATION**

**I recommend:**

**(REC.0776) that no modification be made to the DD in response to these objections and, in particular, that NA 300 be not accepted.**

## NEAR TAI LLEUAR - PONTLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/941/1	S. Allport (Petition)		400

### Main Issue

- Whether the DD is appropriate, having regard to the effect of development on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

1. The DD provides that 0.2ha of land near Tai Lleuar, Pontllyfni, be allocated for the development of 5 dwellings. The objector expresses concern that a safe vehicular access cannot be provided because of a potential lack of visibility. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if, among other things, provision is made for a safe vehicular access to the site. The plan, therefore, secures that the safe and free flow of traffic will be maintained even in situations where a planning application to implement the allocation does not incorporate this.

### RECOMMENDATION

I recommend:

**(REC.0777) that no modification be made to the DD in response to this objection.**

## NEAR GWELFOR - RHOSGADFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/280/3	H Middleton		117
B/608/1	Derek Ashford & Jocelyn Eagland		117

### Note

- Objections B/280/3 and B/608/1 are dealt with in the section of this report which relates to the alignment of the Development Boundary adjacent to Ael y Bryn, Rhosgadfan.

## TALYSARN – OLD TIP

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/58	Environment Watch Wales & the Borders		59
B/844/23	CPRW		419
B/551/3	Llanllyfni Community Council		419
B/912/3	John Brian Jones		419
B/671/1	Richard Wyn Huws	Susan Hill – Cynefin Consultants	419
B/660/1	Sharon Owen		419

### Supporters of Deposit Draft

Ref No	Name	Agent	Response Ref
B/239/3	Heulwen Williams		419

### Notes

- Objection B/756/58 is dealt with in the section of this report which relates to Policy D4.
- Objection B/551/3 is now intended, by that objector, to be regarded as an expression of support.

### Main Issues

- The priority to be given to the use of previously developed land.
- The effect on the character and appearance of the village.
- The need for affordable housing.
- The economics of development.
- The effect of development on the safe and free flow of traffic.
- The availability of necessary infrastructure.
- The effect of development on nature conservation interests.

### Inspector's Considerations and Conclusions

*The priority to be given to the use of previously developed land*

1. The LPA, at DD stage, proposes that 0.44ha of land at the Old Tip, Talysarn, be allocated for the development of 11 dwellings. Via NA 233 it proposes to increase the capacity of the site to 30 dwellings. I note that no duly made

objections have been made to this proposed change which would increase the density of development in accordance with the advice of PPW (paragraph 9.2.12). Objectors argue that the previous quarry-related use of the site ceased some 30 years ago and that now, the traces of this are no longer apparent. They consider that landscaping has transformed the area into a green-field site. The LPA does not dispute this.

2. PPW (paragraph 9.2.8) advises that, where there are no suitable areas of previously developed land within settlements, the development of suitable extensions to these is the most sustainable option. Talysarn contains only basic community services and facilities but is connected by public transport to the much wider range of these, and to employment opportunities, at Penygroes only some 2km distant. It is, therefore, an appropriate location to accommodate some additional housing. Having regard to the scarcity of suitable previously developed land within the settlement the development of what is effectively green-field land at the site of the former slate tip would promote a sustainable pattern of settlement to the greatest extent possible in the circumstances.

*The effect on the character and appearance of the village*

3. Objectors argue that the proposed allocation would extend the settlement into the open countryside unacceptably eroding its rural setting. Housing built on it, would however, face directly over open land at only a short distance towards the densely developed terraces which line the north side of the former main road in what was, originally, the centre of the village. It would, in my view, be perceived as reinforcing the core of the settlement rather than extending its periphery.

*The need for affordable housing*

4. Objectors argue that there is a need for more affordable housing at Talysarn. The LPA proposes at Pre-inquiry Proposed Change stage, as an indicative target, that 25% of the capacity of the allocation would be affordable housing. The development of the site for predominantly market housing is necessary to secure that these affordable dwellings are made available.

*The economics of development*

5. An objector argues that, because the site is a former slate tip, it may not be sufficiently stable to support housing development. As a consequence he fears that the site would be unduly expensive to develop. He does not present any technical evidence to support this view. The LPA's Development Brief for the site confirms, however, that the former slate tip has been cleared and the site has been planted with shrubs. There is, therefore, no reason to suppose that development costs will be abnormally high in this case.

*The effect of development on the safe and free flow of traffic*

6. Objectors refer to several road accidents on the adjacent highway network. They fear that the development of additional housing will increase the frequency of these. They also refer to the possible need to divert a public footpath which runs near the site. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result or if

necessary improvements can be made. Policy CH20 provides that development proposals will be refused if they would lead to the loss of a public right of way unless an acceptable alternative can be provided.

*The availability of necessary infrastructure*

7. Objectors express concern that development could lead to local surface water flooding. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure.

*The effect of development on nature conservation interests*

8. Objectors refer to the use of the site by wildlife including kites and rabbits. Policy B20 provides that when a development is approved, planning conditions and/or obligations will be used to protect the nature conservation value of the site or to ensure that appropriate mitigation measures are taken.

## **RECOMMENDATIONS**

**I recommend**

**(REC.0778) that the DD be modified by the acceptance of NA 233 insofar as it relates to this allocation;**

**(REC.0779) that no other modification be made to the DD in response to these objections.**

## OPPOSITE PRIMARY SCHOOL – WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/718/4	PD Basterfield		436

### Draft Deposit Unconditionally Withdrawn

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/62	CPRW		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/1043/9	Waunfawr Community Council		
B/1043/7	Waunfawr Community Council		

### Main Issue

- Whether the DD is appropriate, having regard to the effect of development on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes to allocate 0.6ha of land opposite the primary school at Waunfawr, for the erection of 15 dwellings. The objector refers to a recent increase in traffic on the road serving the site and argues that the development of additional houses will increase traffic at a point where there is already congestion due to the presence of the school. He speculates that development might require the removal of a lay-by which is used by school staff to park their cars, leading to car parking in unsuitable places. The Development Brief for the site notes the need for the site layout to provide a car park for the primary school to compensate for parking spaces lost in providing access to the site.

2. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if a safe vehicular access can be provided and the existing road network is of a standard sufficient to deal with the flow of traffic that is likely to result, or can be made so. The plan, which makes provision for the period to 2016, therefore secures the safe and free flow of traffic in situations where a planning application to implement the allocation does not incorporate a safe access and the local road network, at the time of the planning application, is of an inadequate standard.



**RECOMMENDATION**

**I recommend:**

**(REC.0780) that no modification be made to the DD in response to this objection.**

## NEAR SHOP – WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/63	CPRW		423

### Supporters of Draft Deposit

Ref No	Name of Supporter	Agent	Response Ref
B/822/1	Brian & Rita Henderson		

### Main Issue

- Whether the DD is appropriate, having regard to the effect of development on the pattern of settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that 0.4ha of land near to the shop at Waunfawr be allocated for the development of 5 dwellings. At Pre-inquiry Proposed Change stage it proposes, via NA 233, that the capacity of the allocation be increased to 10 dwellings. The objector argues that this allocation does not relate well to the existing pattern of settlement. PPW (paragraph 9.3.1) advises that new housing should be well integrated with and connected to this. The LPA argues that the proposed allocation would be in the most accessible location in relation to the principal facilities and services of the village, and therefore maximise the opportunities for trips on foot rather than by car in the interests of promoting a sustainable pattern of settlement. The proposed allocation is, however, beyond the limits of the built development of the village. Its present rural character is emphasised by the narrowness and twisting nature of the lane which connects it to the village core. It is clearly part of the rural setting of the village rather than of the settlement itself.

2. Development of the allocation would require the substantial upgrading and widening of the highway at this point. This would reinforce the visual impact of the new dwellings. Because it would dramatically erode the rural setting of the village at an important gateway to the settlement, the proposed allocation cannot be regarded as well integrated with the pattern of settlement as PPW requires. In my view this is sufficient, in its own right, to justify the deletion of the proposed allocation.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0781) that the DD be modified by the deletion of the proposed housing allocation near to the shop in Waunfawr;**

**(REC.0782 that no other modification be made to the DD in response to this objection and, in particular, that NA 233 be not accepted in so far as it relates to this site.**

## OPPOSITE SHOP - WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/24	CPRW		423

### Supporters of Deposit Draft

Ref No	Name	Agent	Response Ref
B/1043/8	Cyngor Cymuned Waunfawr		423

### Main Issue

- Whether the DD is appropriate, having regard to the effect of development on the pattern of settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that 0.5ha of land opposite the shop at Waunfawr be allocated for the development of 12 dwellings. The objector argues that this allocation does not relate well to the existing pattern of settlement. PPW (paragraph 9.3.1) advises that new housing should be well integrated with and connected to this. The LPA argues that the proposed allocation would be in the most accessible location in relation to the principal facilities and services of the village and therefore maximise the opportunity for trips on foot rather than by car in the interests of promoting a sustainable pattern of settlement. The proposed allocation is, however, beyond the limits of the built development of the village. Its present rural character is emphasised by the narrowness and twisty nature of the lane which connects it to the village core. It is clearly part of the rural setting of the village rather than of the settlement itself.

2. Development of the allocation would require the substantial upgrading and widening of the highway at this point. This would reinforce the visual impact of the new dwellings. Because it would dramatically erode the rural setting of the village at an important gateway to the settlement, the proposed allocation cannot be regarded as well integrated with the pattern of settlement as PPW requires. In my view this is sufficient, in its own right, to justify the deletion of the proposed allocation.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0783) that the DD be modified by the deletion of the proposed housing allocation opposite the shop at Waunfawr;**

**(REC.0784) that no other modification be made to the DD in response to this objection.**

**OMISSION OF HOUSING LAND ALLOCATIONS: CAERNARFON DCA**

**PLOT 188, BRYN DIFYR, BETHEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/78/1</b>	<b>John Williams</b>		<b>246</b>
<b>B/78/3</b>	<b>John Williams</b>		<b>246</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land should be included within the Development Boundary of the Village of Bethel and be allocated for housing development in order to satisfy a local need for self-build housing plots.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0785) that no modification be made to the DD in response to these objections.**

**NEAR BRYN TIRION, BETHEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/546/1</b>	<b>Huw Meredydd Roberts</b>		<b>248</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land should be included within the Development Boundary of the Village of Bethel and be allocated for housing development because it would satisfy a local need for this.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0786) that no modification be made to the DD in response to this objection.**



### THREE PLOTS, BONTNEWYDD

This Section is subject to Pre-Inquiry Proposed Changes Nos:

#### Objections

Objection ref. No	Name of objector	Agent	Response Ref.
B/949/1	Mr Glyn Jones	Berwyn Owen	135

#### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above sites from allocation for housing development.

#### Inspector's Considerations and Conclusions

1. The objector argues that three closely related areas of land should be included within the Development Boundary of the Village of Bontnewydd and be allocated for housing development because there is a lack of scope to develop necessary new housing there.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

#### RECOMMENDATION

I recommend:

**(REC.0787) that no modification be made to the DD in response to this objection.**

## CAE STANLEY NEAR PONT GLAN BEUNO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/11	Lord Newborough	Guy D Evans	135

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Bontnewydd and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0788) that no modification be made to the DD in response to this objection.**

## LAND AT CAE STANLEY, BONTENEWYDD

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/10	Lord Newborough	Guy D Evans	135

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Bontnewydd and be allocated for housing development because he considers that recent development has been concentrated on the west side of the settlement and development of his site on the east side would achieve some sort of balance. The site is an area of open countryside. Due to its irregular shape it would connect with the existing built-up area of the village along only a short length of its periphery. It would not, therefore, be well integrated with the existing pattern of settlement as PPW (paragraph 9.31.) advises.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development on the rural setting of the village, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0789) that no modification be made to the DD in response to this objection.**

## PONT EFAIL BACH, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/6	Lord Newborough	Guy D Evans	266

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Caeathro and be allocated for housing development because it would be in a sustainable location and secure a logical rounding-off of the built-up area. The development would adjoin the built form of the village only at its northern edge and its other three sides would abut the open countryside. It would not, therefore, be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises and would harm its rural setting.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and my conclusion in respect of the rural setting of the village, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0790) that no modification be made to the DD in response to this objection.**

## LAND OPPOSITE BRYN EGLWYS, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/146/2	Prys Thomas		256

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be allocated for housing development because there is a need to build more houses on the edge of the village of Caethro rather than within the settlement itself. The site is part of a field adjacent to a small sporadic residential development which is, itself, separated from, the consolidated built-up area of the village by a significant gap of open land. It is, clearly, part of the open countryside. Its development would create a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to its effect on the rural setting of Caethro, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0791) that no modification be made to the DD in response to this objection.**

## LAND NORTH OF CEFN Y GOF, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/5	Lord Newborough	Guy D Evans	354

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Caeathro and be allocated for housing development because it would be in a sustainable location and secure a logical rounding-off of the built-up area. The development would connect to the built form of the village only along its eastern and southern edges. On its other sides it would abut the open countryside. It would not, therefore, be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises and would harm its rural setting.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and my conclusion in respect of the rural setting of the village, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0792) that no modification be made to the DD in response to this objection.**

## SCHOFIELDS SITE, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/959/4	Mr K Salisbury	CDN Planning	9
B/959/8	Mr K Salisbury	CDN Planning	9

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Caernarfon and be allocated for housing development because it is near to the wide range of services and public transport links which are available within the town centre. It should therefore, he contends, be regarded as being in a sustainable location. Due to the local land form and the presence of dense belts of mature trees, it is argued, the site is not prominent and could be developed without harm to the rural setting of Caernarfon.

2. The site is, however, separated by a large ornamental park, a playing field and the River Seiont from the nearest part of the consolidated built-up area of Caernarfon. It is clearly part of the open countryside which surrounds the town and its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

3. The objector argues that the site is previously developed land, but the traces of development are no longer apparent on most of it. In any case PPW (paragraph 2.7.1) advises that not all previously developed land is suitable for development. Paragraph 9.2.6 advises that it is the use of 'appropriate' previously developed land that can assist regeneration. In this case, because of its clear separation from the built-up area of Caernarfon, the use of this site cannot be considered to be appropriate.

4. I note, furthermore, that half of the site is within the defined C2 flood risk zone. The effect of development in promoting a fragmented pattern of settlement is sufficient in its own right to justify the non-allocation of even that part which is not vulnerable to flooding

5. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in

the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the need to avoid a fragmented pattern of settlement, I conclude that this land should not be allocated for housing development.

## **RECOMMENDATION**

**I recommend:**

**(REC.0793) that no modification be made to the DD in response to these objections.**



## FIELDS 8700, 8309, CAERNARFON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/948/5	Mr Myfyr Jones	Berwyn Owen	270

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Caernarfon and be allocated for housing development. At a density of 25 to 30dph it could accommodate between 148 and 177 dwellings.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0794) that no modification be made to the DD in response to this objection.**

**FIELDS NUMBERS 1833, 0925, 0411, CAERNARFON**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/980/3</b>	<b>Robin Jones Bob Jones (Butchers)</b>	<b>Gareth J White</b>	<b>282</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Caernarfon and be allocated for housing development because there are limited opportunities for the provision of new general market housing elsewhere in the town. Its development would allow the improvement of the adjacent A487 highway which is an important entrance to Caernarfon. The site is an extensive area of agricultural land and has only the most tenuous physical connection to the built-up area, being separated from the bulk of the built form of the town by a large field. It would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the harmful effect on the rural setting of the town, I conclude that this land should not be allocated for housing development. These conclusions, in my view, outweigh the benefits of the scheme in securing the desirable improvement of the local highway network.

**RECOMMENDATION**

**I recommend:**

**(REC.0795) that no modification be made to the DD in response to this objection.**

## LAND AT TANYFFORDD, CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/929/3	Mrs Megan Williams	D L Hughes	286

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Carmel and be allocated for housing development to meet local need. The site is located in the open countryside beyond the consolidated built-up area of the village. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development in promoting a fragmented pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0796) that no modification be made to the DD in response to this objection.**

## LAND NEAR THE VILLAGE HALL, CLYNNOG FAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/13	Lord Newborough	Guy D Evans	22

### Note

- Objection B/924/13 is responded to in LPA proof 297, not 22.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Clynnog Fawr and be allocated for housing development because this would conform to the pattern of field boundaries in the immediate locality. The local facilities are considered to be capable of supporting the additional dwellings proposed.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0797) that no modification be made to the DD in response to this objection.**

## LAND EAST OF BRO CELYN, CLYNNOG FAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/14	Lord Newborough	Guy D Evans	298

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Clynnog Fawr and be allocated for housing development because it is capable of being supported by local facilities.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0798) that no modification be made to the DD in response to this objection.**

## LAND BETWEEN VILLAGE AND BY-PASS LINE, CLYNNOG FAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/15	Lord Newborough	Guy D Evans	296

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Clynnog Fawr and be allocated for housing development because it would consolidate the built-up area up to the line of a proposed by-pass road. This 1.5ha site could, at densities between 25 and 30dph accommodate between 38 and 45 dwellings. A development on this scale would dominate this small village which has grown piece-meal over many years. PPW (paragraph 9.3.1) advises that where housing development is on a significant scale it should be integrated with existing or new industrial, commercial and retail development and with community facilities. These are almost entirely lacking at Clynnog Fawr.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the unsuitability of Clynnog Fawr to accommodate development on the scale proposed, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0799) that no modification be made to the DD in response to this objection.**

## LAND AT CAEAU UCHAF, DEINIOLEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/645/1	John Griffith		330

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Deiniolen and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0800) that no modification be made to the DD in response to this objection.**

## LAND NORTH OF THE SCHOOL PLAYING FIELDS, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA277

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/9	Lord Newborough	Guy D Evans	359

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/2026	Lord Newborough	Guy D Evans	359
B/756/2133	Environment Watch Wales & the Borders		112

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. An objector argues that this land should be included within the Development Boundary of the Village of Groeslon and be allocated for housing development because, in the past, housing development has taken place on the southern side of the central road and this should be balanced by development on the northern side. He considers that the village contains a sufficient range of services and facilities that it could be regarded as a sustainable location. The LPA, via NA 277, proposes to include part of the objection site within the Development Boundary but not allocate this for housing. The objector reiterates his view that the whole site should be included and be allocated for housing.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.



**RECOMMENDATION**

**I recommend:**

**(REC.0802) that no modification be made to the DD in response to these objections and, in particular, that NA 277 be not accepted.**

## LAND BETWEEN THE A487 AND THE COAL YARD, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/7	Lord Newborough	Guy D Evans	361

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Groeslon and be allocated for housing development because, in the past, housing development has taken place on the southern side of the central road and this should be balanced by development on the northern side. He considers that the village contains a sufficient range of services and facilities that it could be regarded as a sustainable location

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0803) that no modification be made to the DD in response to this objection.**

## LAND EAST OF THE OLD A487

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/8	Lord Newborough	Guy D Evans	362

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Groeslon and be allocated for housing development because, in the past, housing development has taken place on the southern side of the central road and this should be balanced by development on the northern side. He considers that the village contains a sufficient range of services and facilities that it can be regarded as a sustainable location.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0804) that no modification be made to the DD in response to this objection.**

**LAND NEAR TANFFORDDFELEN (FIELD NO 3052), GROESLON**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/695/3</b>	<b>Arthur Wyn &amp; Marina Parry</b>		

## LLAINWEN, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA281

### Objections

Objection ref. No	Name of objector	Agent	Response Ref.
B/999/5	Rossisle Development Co Ltd	M Gilbert	86
B/999/7	Rossisle Development Co Ltd	M Gilbert	86

### Supporters of Draft Deposit

Ref. No	Name	Agent	Response Ref.
B/54/1	Jacqueline Jones		

### Objections to Proposed Changes

Objection ref. No	Name of objector	Agent	Response Ref.
B/756/21 35	Environment Watch Wales & the Borders		86
B/972/20 03	Dr Morris		86

### Note

- Objections B/999/5 and B/999/7 are responded to in LPA proof 178 not 86.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. An objector argues that this land should be included within the Development Boundary of the Local Centre of Llanberis and that the south eastern part of it should be allocated for housing development. He considers that the development of market housing, with an element of affordable housing, would meet local needs. The market housing would also provide funding which could be used to secure improvements to the remainder of the land which is proposed to be enclosed within the Development Boundary. These could include the upgrading of off-road car parking for local residents. Such an extension of the Development Boundary would, however, provide the policy context for future housing development.

2. The LPA, via NA 281, proposes to extend the Development Boundary to include the area that the objector argues should be the subject of a housing allocation. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of development, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement in the ways sought by the objector and proposed by the LPA.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

## **RECOMMENDATION**

**I recommend:**

**(REC.0805) that no modification be made to the DD in response to these objections and, in particular, that NA 281 be not accepted.**

## LAND NEAR MAES PADARN, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection ref. No	Name of objector	Agent	Response Ref.
B/972/1	Dr Morris	Jan Tyrer	85

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Llanberis and be allocated for housing development because it is centrally located within the settlement, within walking distance of its facilities and is surrounded by residential development. The site is relatively flat and is not visually prominent. The objector contends that development of this land would meet a local need for housing.

2. For the reasons I give in the section of this report which relates to the proposed DD housing land allocation Near Maes Padarn, Llanberis (in Housing Land Allocations: Caernarfon DCA), I have concluded that the area of open land between Church Lane and the housing estate of Maes Padarn is part of the semi-rural setting of Llanberis. Development of this area would unacceptably erode the spacious character of this part of the urban fringe. Furthermore, for the reasons I give in the section of this report which relates to Policy CH1, I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and the effect of development on the character of this settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0806) that no modification be made to the DD in response to this objection.**

## LAND NEAR PEN Y BRYN, LLANDWROG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/18	Lord Newborough	Guy D Evans	254

### Note

- Objection B/924/18 is dealt with in the section of this report which relates to the proposed allocation of land Near Bryn Llan, Llandwrog.



**TYDDYN MAWR, FFORDD CRAWIA, LLANRUG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1031/2</b>	<b>Mr Nigel Williams</b>	<b>SG Associates</b>	<b>5</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land should be included within the Development Boundary of the Village of Llanrug and be allocated for housing development in order to meet housing need in this settlement. The site is within walking distance of the facilities of the village, including public transport links to larger centres and, the objector contends, development would not harm its character, form or setting.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0807) that no modification be made to the DD in response to this objection.**

## LAND NEAR GLANLLYN, FFORDD MINFFORDD, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/126/1	Iwan Roberts		380

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Llanrug and be allocated for housing development in order to meet a local need for house building. Because of the facilities in the village, and its public transport links to larger settlements, the objector contends that it should be regarded as a sustainable location for further development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0808) that no modification be made to the DD in response to this objection.**

**BEHIND 1 CASTELL COTTAGE, LLANRUG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/285/1</b>	<b>Gareth Roberts</b>		

## NEAR THE ROUNDABOUT, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/154/4	Sue Cooper		390

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Penygroes and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0809) that no modification be made to the DD in response to this objection.**

## NEAR THE CEMETARY, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/154/7	Sue Cooper		391

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Penygroes and be allocated for housing development. The site would be of sufficient depth to accommodate only a single line of new dwellings, which would extend beyond the edge of the consolidated built-up area of Penygroes into the open countryside. It would create ribbon development contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of the proposal on settlement form, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0810) that no modification be made to the DD in response to this objection.**

## NEAR PLAS SILYN, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/154/8	Sue Cooper		600

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Penygroes and be allocated for housing development. It is located at the eastern edge of Penygroes and its development would erode the small gap of open land which separates this settlement from Talysarn. Its development would promote the coalescence of settlements, contrary to the advice of PPW (paragraph 9.3.1)

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development on the pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0811) that no modification be made to the DD in response to this objection.**

**DOROTHEA SITE, PENYGROES**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/661/3</b>	<b>Dafydd G Owen Antur Nantlle</b>		

## BEHIND CAPEL BETHEL, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/154/6	Sue Cooper		394

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Penygroes and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0812) that no modification be made to the DD in response to this objection.**



## CAE GORS, RHOSGADFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/931/1	Mountain Rangers Sports & Social Club		405

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Rhosgadfan and be allocated for housing development to meet need for low cost housing for local families.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0813) that no modification be made to the DD in response to this objection.**

## OPPOSITE PENTERFYN, TALYSARN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/912/1	John Brian Jones		420

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Talysarn and be allocated for housing development to meet local need, some of which is for affordable housing.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

3. An extension of the Development Boundary is not necessary to secure the scope for the development of affordable housing because Policy CH6 (as subject to NA158) provides that proposals for this will be approved on suitable sites directly adjoining the Development Boundaries of Villages, provided that they conform to stated criteria.

### RECOMMENDATION

**I recommend:**

**(REC.0814) that no modification be made to the DD in response to this objection.**

## REAR OF SNOWDONIA FIRE PROTECTION, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/718/3	PD Basterfield		424

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Waunfawr and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0815) that no modification be made to the DD in response to this objection.**

## OPPOSITE ANTUR WAUNFAWR, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/4	Waunfawr Community Council		435

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Waunfawr and be allocated for housing development. The proposed site is an area of agricultural land entirely detached from the consolidated built-up area of the village. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and also to the harmful effect of the proposal on the pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0816) that no modification be made to the DD in response to this objection.**

## GWERNYDD, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/353/1	Robert Williams		177
B/1043/15	Waunfawr Community Council		177

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. An objector argues that this land should be included within the Development Boundary of the Village of Waunfawr and be allocated for housing development. He argues that development would infill a gap between two adjacent dwellings. These are some distance apart, however, and the development of the objector's site would effect a significant extension of the village into the open countryside, unacceptably eroding its rural setting. Development would increase the number of vehicles using the sub-standard road junction adjacent to Ger y Nant and would, therefore, harm the safe and free flow of traffic.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the harmful effect of development on the rural setting of the village and on the safe and free flow of traffic, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0817) that no modification be made to the DD in response to these objections.**

## CROES Y WAUN, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/963/1	Mr & Mrs N Gray-Parry	Peter Marston	173

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Waunfawr, and be allocated for housing development, because it was proposed to be allocated for this purpose in the Consultation Draft of this plan and was removed from this designation only at DD stage. They argue that, if it was considered to be suitable for housing development at that earlier stage it is suitable for this now.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0818) that no modification be made to the DD in response to this objection.**

**BRYN GWYLAN, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA312

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/696/3	N Owen		425
B/696/1	N Owen		438

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/839/2008	Sally Miles	RPS Planning	171

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. An objector argues that this land should be included within the Development Boundary of the Village of Waunfawr and be allocated for housing development.
2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.
3. The LPA proposes, via NA 312, to extend the Development Boundary at this point. For the reasons I give in the section of this report which relate to 'Affordable Housing for Local Need Text' I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. There is no justification, therefore, for them to be further extended as the objector seeks.

**RECOMMENDATION**

**I recommend:**

**(REC.0819) that no modification be made to the DD in response to these objections and, in particular, that NA 312 be not accepted.**



**DEVELOPMENT BOUNDARIES: CAERNARFON DCA**

**TO THE REAR OF CAPEL BETHEL/TAN Y FYNWENT, BETHEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of objector	Agent	Response Ref
B/240/1	JA & PB Owen		67
B/615/1	Mr & Mrs P Hughes		67
B/658/1	Aled Morris		67
B/627/1	Gareth Hughes		67

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/283/1	Menna Thomas		
B/284/1	Megan Roberts		
B/62/1	Gwilym Williams		

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary of the Village of Bethel should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0820) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0821) that no other modification be made to the DD in response to these objections.**

## WERN BACH LAND, BETHEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/811/1	Dafydd Lloyd Warrington		251

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Bethel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The site is within the open countryside some distance from the nearest part of the consolidated built-up area of the village. PPW (paragraph 9.3.6) advises that new house-building in the open countryside away from established settlements should be strictly controlled. Development here would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0822) that no modification be made to the DD in response to this objection.**

## OPPOSITE RHOSLAN ESTATE, BETHEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections

Objection ref. No	Name of objector	Agent	Response Ref.
B/938/1	Mr Sam Davies	Berwyn Owen	64

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Bethel should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0823) that no modification be made to the DD in response to this objection.**

## NEAR TRE'R GOF, BETHEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/725/1	Keith Owen Price		249

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Bethel should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0824) that no modification be made to the DD in response to this objection.**

**GLANLLYN, SARON, BETHEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/818/1</b>	<b>RL Williams</b>		<b>250</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Bethel should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0825) that no modification be made to the DD in response to this objection.**

**WHITE LAND, BRYNREFAIL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/60</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>114</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Village of Brynrefail should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0826) that the DD be modified in accordance with my recommendation (REC.0443)**

**(REC.0827) that no other modification be made to the DD in response to this objection.**



## FIELDS NEAR CAE COCH AND FIELD 0013, BRYNREFAIL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/315/8	Llanddeiniolen Community Council		252

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Brynrefail should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0828) that no modification be made to the DD in response to this objection.**

**Y BONT, BRYNREFAIL**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/111/1</b>	<b>Hefin Williams</b>		
<b>B/655/1</b>	<b>Dennis Jones</b>		
<b>B/617/1</b>	<b>John Williams</b>		
<b>B/618/1</b>	<b>Ivor Evans</b>		

## NEAR BRYN Y GOF, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection No	Ref	Name of Objector	Agent	Response Ref
B/1043/12		Waunfawr Community Council		255

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of Caethro. The DD actually proposes this. It is not, therefore, necessary for the LPA to modify the DD to satisfy the concerns of this particular objector. My recommendation, in the section of this report which relates to affordable housing, that the DD be modified by the re-drawing of the Development Boundaries of settlements in the Local Centre and Village categories so that they follow the actual edge of the consolidated built-up area is, however, relevant to this site.

### RECOMMENDATION

I recommend:

**(REC.0829) that no modification be made to the DD in response to this objection.**

## REAR OF LLWYN CELYN, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1206/1	Mr Gethin Elis Thomas & Mrs Nia Wyn Thomas		267

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Caethro should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0830) that no modification be made to the DD in response to this objection.**

## PWLL BACH FIELD, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/26/1	E Williams		209

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Caeathro should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0831) that no modification be made to the DD in response to this objection.**

## MISSION ROOM, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/270/1	Peter Hughes		257

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Caethro should be realigned to include this land in order to provide for the future development of housing via windfall sites. The site is some distance from the nearest edge of the consolidated built-up area of the village and is part of a sporadic development in the open countryside. PPW (paragraphs 9.3.6 and 9.3.1) advise that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0832) that no modification be made to the DD in response to this objection.**

**CEFN GWERN, CAEATHRO**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA264

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/73/3	William Hughes		253
B/73/4	William Hughes		253

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/2025	Lord Newborough	Guy D Evans	253
B/1463/2003	Mrs Elma Williams	Gareth J White	253

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Caethro should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees with the objectors and proposes, via NA 264, to extend the Development Boundary to include this land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

2. Objectors at Pre-inquiry Proposed Change stage argue that this land has a problematical vehicular access. Policy CH31 would secure that, before planning permission was granted, provision must be made for a safe vehicular access. This

factor would secure that harm to the safe and free flow of traffic would not arise, even if this land was included within the Development Boundary.

## **RECOMMENDATION**

**I recommend:**

**(REC.0833) that no modification be made to the DD in response to these objections and that, in particular, NA 264 be not accepted.**



## NEAR BRYN AFON, CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1315/1	John Little		291

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Carmel should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objector.

### RECOMMENDATIONS

**I recommend:**

**(REC.0834) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0835) that no other modification be made to the DD in response to this objection.**

**OPPOSITE TALARFOR, CARMEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA272

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/53/1	David Roberts		287

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/21 30	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Carmel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees with the objection and, via NA 272, proposes to extend the Development Boundary to include this site. The area is, however, a sporadic development in the open countryside, beyond the edge of the consolidated built-up area of the village. Further development here would reinforce a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0836) that no modification be made to the DD in response to this objection and, in particular, that NA 272 be not accepted.**

## LAND NEAR TAN Y FYNWENT, CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/128/1	Michael Houghton		283

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Carmel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The site lies within the open countryside. Development here would not conform to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that new development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0837) that no modification be made to the DD in response to this objection.**

## LAND NEAR GLYN AFON, CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/709/1	Meirion & Elizabeth Davies		285

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Carmel should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is within the open countryside, far from the nearest edge of the consolidated built-up area of any settlement. Development upon it would be contrary to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0838) that no modification be made to the DD in response to this objection.**

## LAND NEAR BLODWYN, CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA270

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/118/1	Dyfed C Thomas		293

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2128	Environment Watch Wales & the Borders		112

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Carmel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 270, proposes to extend the Development Boundary to include this land

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0839) that no modification be made to the DD in response to this objection and, in particular, that NA 270 be not accepted.**

## GARN LLYWELYN (TANYFFORDD), CARMEL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/579/1	Mr & Mrs C Roberts		281

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Carmel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The site is located within the open countryside. Its development would conflict with the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0840) that no modification be made to the DD in response to this objection.**

**GARN LLYWELYN, CARMEL**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA271

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/579/3	Mr & Mrs C Roberts		281

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2129	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Carmel should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees that the scope for local house building should be increased at Carmel and, via NA 271, proposes to extend the Development Boundary to include an area of adjacent land.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0841) that no modification be made to the DD in response to this objection and, in particular, that NA 271 be not accepted.**

**NEAR THE CHAPEL, CWM Y GLO**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Draft Deposit Unconditionally Withdrawn**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/773/36</b>	<b>Chris Wynne (North Wales Wildlife Trust)</b>		



## TY CAPEL, CWM Y GLO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1028/1	Florence Harris	Merfyn Jones-Evans	302

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Cwm y Glo should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0842) that no modification be made to the DD in response to this objection.**

## LAND NEAR CLAWDD CERRIG, CWM Y GLO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/951/1	Peter Bursnall	Tudur Slaven	300

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Cwm y Glo should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0843) that no modification be made to the DD in response to this objection.**

## BWLCH ACEN, CWM Y GLO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/836/1	Michelle Freeman		301

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Cwm y Glo should be realigned to include this land. She does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0844) that no modification be made to the DD in response to this objection.**

**ADWY'R MYNYDD, DEINIOLEN & CLWT Y BONT**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Draft Deposit**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/639/1</b>	<b>Edward Hughes</b>		

**CAE PENFFRIDD, DEINIOLEN & CLWT Y BONT**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA274

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/550/1</b>	<b>Mrs Carys Griffiths</b>		

**NEAR VICTORIA TERRACE, DEINIOLEN & CLWT Y BONT**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/286/1</b>	<b>Dan &amp; Val Lewis</b>		<b>332</b>
<b>B/916/3</b>	<b>Victoria Terrace Residents (petition with 19 names)</b>		<b>329</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary for the Village of Deiniolen and Clwt y Bont should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0845) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0846) that no other modification be made to the DD in response to these objections.**

**VARIOUS SITES, DEINIOLEN & CLWT Y BONT**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/773/37</b>	<b>Chris Wynne (North Wales Wildlife Trust)</b>		

## LAND NEAR BRYN AWELON, DEINIOLEN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA276

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/326/1	Michael & Eirian Wyn Parry		335

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2132	Environment Watch Wales & the Borders		112

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Deiniolen and Clwt y Bont should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees that the Development Boundary should be extended and proposes NA 276 to secure this.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.



**RECOMMENDATION**

**I recommend:**

**(REC.0847) that no modification be made to the DD in response to these objections and, in particular, that NA 276 be not accepted.**

## LAND BETWEEN RHYD FADOG AND TY'N Y CLWT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA275

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/336/1	Kelvin Jones		337

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Deiniolen & Clwt y Bont should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA proposes, via NA 275, to include within a newly defined Development Boundary land which is near to, but which does not include the objection site. Because there is no duly made objection to this I do not express my view on its merits.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement, in the way sought by this objector.

### RECOMMENDATION

I recommend:

**(REC.0848) that no modification be made to the DD in response to this objection.**

## LAND AT GARNEDD, DEINIOLEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/338/1	Gareth Jones		333

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Deiniolen should be realigned to include this land in order to provide for the future development of a dwelling for his occupation in relation to the management of an agricultural small holding. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement. The plan should, in any case be read as a whole. Policy CH7 presents the circumstances in which new dwellings will be permitted in the countryside.

### RECOMMENDATION

I recommend:

**(REC.0849) that no modification be made to the DD in response to this objection.**

## LAND NEAR NORTH ROAD, DEINIOLEN & CLWT Y BONT

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA273

### Objections

Objection Ref No	Name of Objector	Agent	Response Ref
B/524/1	Ernest Jones		327

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name	Agent	Response Ref
B/756/21 31	Environment Watch Wales & the Borders		327

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Deiniolen and Clwt y Bont should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I note that the LPA proposes to achieve this objective in this area via NA 273. I have, furthermore, for the reasons I give in the section of this report which relates to Policy CH1, concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATIONS

I recommend:

**(REC.0850) that the DD be modified by the acceptance of NA 273;**

**(REC.0851) that no other modification be made to the DD in response to this objection.**

**ADJECENT TO BERWYN, DINAS DINLLE**

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/27/1</b>	<b>Peter Rimmer</b>		
<b>B/31/1</b>	<b>Wynne Williams</b>		
<b>B/33/1</b>	<b>Aled Jones</b>		

**DINAS DINLLE DEVELOPMENT BOUNDARY, DINAS DINLLE**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1218/5</b>	<b>Llandwrog Community Council</b>		

## DEVELOPMENT BOUNDARY, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1218/4	Llandwrog Community Council		288

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Groeslon should be realigned so as to tightly enclose the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they do this. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I note, however, that the Development Boundary at Groeslon, at DD stage, already tightly encapsulates the built form of this settlement and conclude that no further adjustment is necessary.

### RECOMMENDATION

I recommend:

**(REC.0852) that no modification be made to the DD in response to this objection.**

**NEAR COED Y GLYN, GROESLON**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA279

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/929/1	Mrs Megan Williams	D L Hughes	356

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/20 28	Lord Newborough	Guy D Evans	356
B/756/21 34	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Groeslon should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 279, proposes to extend the Development Boundary to secure this.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.



**RECOMMENDATION**

**I recommend:**

**(REC.0853) that no modification be made to the DD in response to these objections and, in particular, that NA 279 be not accepted.**

## LAND NEAR TANFFORDDFELEN (FIELD NO 2249) GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/695/1	Arthur Wyn & Marina Parry		65

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Groeslon should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is located in open countryside a considerable distance from the consolidated built-up area of Groeslon. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0854) that no modification be made to the DD in response to this objection.**

## LAND AT TY'N RHOS, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/1045/1	Mr Eric Williams		66

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Groeslon should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is an area of open countryside which abuts the consolidated built-up area of the village only at its northwest corner. Its development would not be well connected to the settlement as PPW (paragraph 9.3.1) advises.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0855) that no modification be made to the DD in response to this objection.**

## LAND AT GRUGAN DDU, GROESLON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Change No: NAP17

### Conditionally Withdrawn Objection to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/196/1	Eurwyn Jones		360

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Groeslon should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and seeks to achieve this via NAP 17. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0856) that no modification be made to the DD in response to this objection and, in particular, that NAP 17 be not accepted.**

**GARREG WEN, GROESLON**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/797/1</b>	<b>John &amp; Barbara Martin</b>		<b>357</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objectors argue that the proposed Development Boundary for the Village of Groeslon should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0857) that no modification be made to the DD in response to this objection.**

## MUR CWYMP, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA283

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/613/1	Mari Hughes		168

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/610/1	Mr & Mrs P Fretwell		168
B/611/1	Richard James Lyon		168

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2136	Environment Watch Wales & the Borders		112
B/1357/2001	Ms L Pleming		168

### Supporters of Proposed Change

Ref No	Name	Agent	Response Ref
B/1426/2001	Dr Geraint Roberts		
B/611/2003	Richard James Lyon		

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors variously argue that the proposed Development Boundary of the Local Centre of Llanberis should be realigned to exclude the above land or that it should be retained as in the DD with a view to building a further dwelling on the land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of

settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres.

2. The dwellings of Mur Cwyp and Llwyn Dyrus, while near to the consolidated built-up area of Llanberis, are separated from it by a visually significant belt of trees. They have the appearance of being a sporadic development within the open countryside rather than part of the settlement. For this reason the LPA proposes NA 283 to exclude this land from the Development Boundary. I consider that the above arguments justify this. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0858) that the DD be modified by the acceptance of NA 283;**

**(REC.0859) that no other modification be made to the DD in response to these objections.**

**PENTRECASTELL AREA, LLANBERIS**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/8</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>115</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Local Centre of Llanberis should be realigned to exclude areas of undeveloped land at the edge of the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0860) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0861) that no other modification be made to the DD in response to this objection.**



## LAND NEAR AEL Y GLYN, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA282

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/840/1	Dennis Davies		87

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/972/2004	Dr Morris		87

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Local Centre of Llanberis should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. The LPA agrees and, via NA 282, proposes to extend the Development Boundary to enclose part of this area. The land is at the extreme western edge of the settlement and, due to extensive tree cover and undulating land form, is perceived as part of the rural landscape setting of Llanberis. PPW (paragraph 9.3.6) advises that, in such areas, new development should be strictly controlled.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0862) that no modification be made to the DD in response to these objections and, in particular, that NA 282 be not accepted.**

## LAND NEAR BRYN AWELON, 4 WARDEN STREET, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1208/1	Nia Williams		371

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Llanberis should be realigned to include this land. She does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is a rocky outcrop that rises above adjacent dwellings and supports mature trees which are part of a wider woodland that provides part of the rural setting of Llanberis. Development would damage the character and amenity of the area contrary to the advice of PPW (paragraph 9.3.3).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0863) that no modification be made to the DD in response to this objection.**

**LAND OFF WARDEN STREET, LLANBERIS**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA285

**Draft Deposit Unconditionally Withdrawn**

Objection ref. No	Name of objector	Agent	Response Ref.
B/1002/1	Mrs H Jones	WE Jones	

**Objections to Proposed Changes**

Objection ref. No	Name of objector	Agent	Response Ref.
B/972/20 05	Dr Morris		90

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. In response to an objection at DD stage the LPA proposes, via NA 285, to extend the Development Boundary of the Local Centre of Llanberis to include the above land. The site is part of an ancient semi-natural woodland which forms a visually significant element of the rural setting of Llanberis. Development would unacceptably damage the character and amenity of the area contrary to the advice of PPW (paragraph 9.3.3).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the continued exclusion of this land from the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0864) that no modification be made to the DD in response to these objections and, in particular, that NA 285 be not accepted.**

## WHITE LAND, LLANBERIS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/756/61	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Local Centre of Llanberis should be realigned to exclude areas of undeveloped land at the edge of the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0865) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0866) that no other modification be made to the DD in response to this objection.**

## LLANLLYFNI IN GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft Plan

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/62	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Llanllyfni should be realigned to exclude areas of undeveloped land at the edge of the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0867 that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0868) that no other modification be made to the DD in response to this objection.**

## SITES AT LLANLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA294

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/38	Chris Wynne (North Wales Wildlife Trust)		376

### Notes

- Despite the title set out above, this objection relates only to one site - land to the rear of St Rhedyw's Church, Llanllyfni.
- This section is subject to Pre-inquiry Proposed Change NA 291, not NA 294 as is stated in the box heading above.

### Main Issue

- Whether the proposed site should be included within the Development Boundary of Llanllyfni

### Inspector's Considerations and Conclusions

1. Although the objector has referred to the Plan's proposed land allocation on this site, which lies to the rear of St Rhedyw's Church, I have assumed this to mean the site's inclusion with the Development Boundary of Llanllyfni. The basis of the objection is that the site has a wildlife value that means that it should be protected from development. The Council explains that as the land is open and lies on the edge of the built up area it is best excluded from the defined development boundary. It offers NA 291 which redefines the Development Boundary so as to exclude the land in question. In the light of this Pre-inquiry Proposed Change it is not necessary for me to reach a view on the wildlife interest of the site.

### RECOMMENDATIONS

I recommend:

**(REC.0869) that the DD be modified by the acceptance of NA 291;**

**(REC.0870) that no other modification be made to the DD in response to this objection.**

**TO THE REAR OF BRYN BEDW, LLANLLYFNI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/198/3</b>	<b>JP Pollard</b>		

**Note**

- Notwithstanding the heading above, this site is known as Bryn Rhedyw.

## LAND SURROUNDING AND INCLUDING HAFAN, LLANLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA290

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/198/1	JP Pollard		61

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/144/1	A Jones		
B/133/1	A Bee		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2138	Environment Watch Wales & the Borders		61

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary of the Village of Llanllyfni should be realigned to exclude the above land because, as landowner, he has no intention of developing it. The LPA agrees and, via NA 290, proposes to exclude this area from the Development Boundary. An objector to the Pre-inquiry Proposed Change argues that the Development Boundary of the Village should be drawn tighter still to exclude the areas of undeveloped land at the edges of the built-up area.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my



recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objectors.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0871) that the DD be modified by the acceptance of NA 290;**

**(REC.0872) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0873) that no other modification be made to the DD in response to these objections.**

## OPPOSITE GARAGE AND SCHOOL, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections

Objection ref. No	Name of objector	Agent	Response Ref.
B/942/1	Mr J Trevor	Berwyn Owen	4

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0874) that no modification be made to the DD in response to this objection.**

## CEFN RHYDDALLT, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/123/1	Goronwy Price Morris		174

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0875) that no modification be made to the DD in response to this objection.**

**FRON HYFRYD, LLANRUG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/262/1</b>	<b>Gwynfor Jones</b>		

## LAND NEAR FFORDD BRYNGWYN, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA292

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/214/1	Harold Davies		379

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2139	Environment Watch Wales & the Borders		112
B/1661/2001	Llanrug Community Council		379

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees with the objector and proposes, via NA 292, to include this land within a Development Boundary. The area is, however, simply a small sporadic development within the open countryside. Its inclusion would conflict with the advice of PPW (paragraph 9.3.1) that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not creating an additional Development Boundary in this case.

**RECOMMENDATION**

**I recommend:**

**(REC.0876) that no modification be made to the DD in response to these objections and, in particular, that NA 292 be not accepted.**

## LAND AROUND PENFRO, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/212/1	Maldwyn Davies		383

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0877) that no modification be made to the DD in response to this objection.**

## FIELD OS NUMBER 9469, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/264/1	M Jones		378

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0878) that no modification be made to the DD in response to this objection.**



**NEAR RECREATION AREA, LLANRUG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection ref. No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref.</b>
<b>B/773/39</b>	<b>Chris Wynne (North Wales Wildlife Trust)</b>		

#### 4 RHES ARFON, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA294

##### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/125/1	Dewi Williams		377

##### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2142	Environment Watch Wales & the Borders		112
B/756/2141	Environment Watch Wales & the Borders		112
B/1661/2004	Llanrug Community Council		377

##### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

##### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 294, proposes to include this area within the Development Boundary. The land is, however, part of a sporadic development in the open countryside. Its further development would conflict with the advice of PPW (paragraph 9.3.1) that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0879) that no modification be made to the DD in response to this objection and, in particular, that NA 294 be not accepted.**

## PEN Y BUARTH, LLANRUG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/116/1	E Edwards		382

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanrug should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0880) that no modification be made to the DD in response to this objection.**

**TO THE REAR OF TY'N RHOS, LLANRUG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/809/1</b>	<b>John &amp; Betty Griffiths</b>		<b>384</b>
<b>B/835/1</b>	<b>John Edwards</b>		<b>384</b>
<b>B/1215/1</b>	<b>Guto &amp; Anwen Edwards</b>		<b>384</b>
<b>B/810/1</b>	<b>Rolant Wynne</b>		<b>384</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary of the Village of Llanrug should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0881) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0882) that no other modification be made to the DD in response to these objections.**

**WINLLAN, LLANRUG**

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/331/1</b>	<b>Joan Roberts</b>		

## OPPOSITE ERYRI , PENI SARWAUN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA298

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/75/1	Kenneth Hogg		162
B/113/1	Sonia Whenman		162

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/723/4	William Lewis		
B/744/3	Sioned Lewis		
B/743/1	Nia Lewis		
B/603/1	D Lewis		
B/745/3	Sian Lewis		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/743/2004	Nia Lewis		162
B/603/2004	DH Lewis		162
B/744/2004	Sioned Lewis		162

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors variously argue that the proposed Development Boundary for the Village of Penisarwaun should be realigned to exclude the above land or be retained as proposed in the DD. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. The LPA agrees, in this case, that the Development Boundary should be re-aligned to exclude this land and proposes to achieve this via NA 298. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this

settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0883) that the DD be modified by the acceptance of NA 298;**

**(REC.0884) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0885) that no other modification be made to the DD in response to these objections.**



## SITE AT GIS NUMBER 299, PENISARWAUN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/337/1	Karen Williams		385

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Penisarwaun should be realigned to include this land in order to provide for the future development of housing via windfall sites. The site is remote from the consolidated built-up area of the Village and is surrounded on all sides by the open countryside. Its development would create a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0886) that no modification be made to the DD in response to this objection.**

**FIELD NUMBER 2883, TYDDYN PERTHI , PENISARWAUN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:  
This Section is subject to Further Proposed Change No: NAP39

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/712/1</b>	<b>Sion Jones</b>		

**Note**

- Objection B/712/1 is responded to in LPA proof 494.

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Penisarwaun should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NAP 39, proposes to include land at Tyddyn Perthi within the Development Boundary of Penisarwaun. Both the site referred to by the objector and that which is the subject of the Further Proposed Change are within the open countryside, distant from any settlement. Their development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0887) that no modification be made to the DD in response to this objection and, in particular, that NAP 39 be not accepted.**

## CLUSTERS AROUND PENISARWAUN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA297

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/713/1	Michael Wyn Jones		268
B/315/3	Llanddeiniolen Community Council		268

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/252/3	Phyllis Ellis		268

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1478/2001	Mrs NE Jones		268
B/756/2143	Environment Watch Wales & the Borders		268 & 112
B/712/2003	Sion Wyn Jones		268

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/1650/2001	Janice Irene Jones	Michael Wyn Jones	268

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Penisarwaun should be realigned to include a number of adjacent groups of dwellings in order to reflect what they regard as a traditional dispersed pattern of settlement in this locality. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable

consideration of proposals for new house-building. The LPA agrees with the objectors and proposes, via NA 297, to define Development Boundaries around five small groups of dwellings which lie in the open countryside on the approaches to the Village. Each of these is nothing more than a sporadic development in the rural landscape. Development within them would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

## **RECOMMENDATION**

**I recommend:**

**(REC.0888) that no modification be made to the DD in response to these objections and, in particular, that NA 297 be not accepted.**

**NEAR LLYS Y GWYNT, PENISARWAUN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/557/3</b>	<b>E Jones</b>		

**LAND TO THE REAR OF CEFN MAES LLYN, NO.854, PENYGROES**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA301

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/57/1	Mr & Mrs M Love		396

**Supporters of Pre-Inquiry Proposed Change**

Ref No	Name of Supporter	Agent	Response Ref
B/779/2005	Elwyn Jones-Griffith		396

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Local Centre of Penygroes should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 301, proposes to extend the Development Boundary to include this land.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0889) that no modification be made to the DD in response to this objection and, in particular, that NA 301 be not accepted.**

## LAND NEAR HEN LÔN HOUSES, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/671/3	Richard Huws	Susan Hill	167

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Penygroes should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0890) that no modification be made to the DD in response to this objection.**

**TO THE REAR OF MOR AWEL ESTATE, PENYGROES**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/580/1</b>	<b>Bleddyn Williams</b>		<b>395</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Local Centre of Penygroes should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0891) that no modification be made to the DD in response to this objection.**



## LAND BETWEEN SPOKINE & BRYN HYFRYD, PENYNGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA299

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/762/3	Alan Osborne & Ann Vaughan Jones		36

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2144	Environment Watch Wales & the Borders		36

### Unconditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/586/2003	Dafydd Williams		

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/779/2003	Elwyn Jones-Griffiths		

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Local Centre of Penyngroes should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 299, proposes to include part of this area within the Development Boundary.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of

settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

## **RECOMMENDATION**

**I recommend:**

**(REC.0892) that no modification be made to the DD in response to these objections and, in particular, that NA 299 be not accepted.**

## PONTLLYFNI IN GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/260/1	Clynnog Fawr Community Council		399

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Pontllyfni should be realigned to include additional land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0893) that no modification be made to the DD in response to this objection.**

**BRON HEULOG, PONTLLYFNI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/921/1</b>	<b>Mr &amp; Mrs R Girffiths</b>		

## CARTREFLE, PONTLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/882/1	Mr & Mrs RG Jones		398

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors note that only part of a field in their ownership is included within the proposed Development Boundary for the Village of Pontllyfni. They argue that this should be realigned to include the whole of his land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0894) that no modification be made to the DD in response to this objection.**

## LAND BETWEEN CARROG AND SNOWDON VIEW

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/996/1	Tony Pumfrey		397
B/37/1	Ieuan Williams		401

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Pontllyfni should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0895) that no modification be made to the DD in response to these objections.**

## CARROG PONTLLYFNI (GIS178), PONTLLYFNI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/664/1	Sheila M & Ira R Jones		397

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Pontllyfni should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0896) that no modification be made to the DD in response to this objection.**

**LAND ADJACENT TO AEL Y BRYN, RHOSGADFAN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/614/1	Hannah Lee & Paul Copestake		117
B/702/1	Sydna Owen		117
B/681/1	Llanwnda Community Council		117
B/577/1	Mrs Maria Bastow		117
B/169/1	Julia & Anthony Baker		117
B/160/1	Stephen Bastow		117
B/280/1	H Middleton		117
B/1220/1	Gwilym Williams		117
B/578/1	R Eaglestone		117

**Unconditionally Withdrawn Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/539/1	Mrs Ann Richardson		

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/832/1	Selwyn Hughes		

**Note**

- Objections B/280/3, B/933/1 and B/608/1 are dealt with in this section in addition to the above.

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary of the Village of Rhosgadfan should be realigned to exclude the above land. The area consists of two dwellings separated from each other and from the consolidated built-up area of



the village by visually significant gaps. It is simply an area of sporadic development at the edge of Rhosgadfan and further house-building would extend a finger of development further into the open countryside, eroding the rural setting of the village.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0897) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0898) that no other modification be made to the DD in response to these objections).**

## NEAR BRONALLT, RHOSGADFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA307

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/538/1	Keith Davies		406

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/982/2004	Mr Brian Jones		406
B/756/2148	Environment Watch Wales & the Borders		112

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Rhosgadfan should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. The LPA agrees and, via NA 307, proposes to extend the Development Boundary in a way which would include part of the land referred to by the objector.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

**RECOMMENDATION**

**I recommend:**

**(REC.0899) that no modification be made to the DD in response to this objection and, in particular, that NA 307 be not accepted.**

**NEAR THE FOOTBALL CLUB, RHOSGADFAN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA306

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/521/1	Steve & Sharon Williams		375

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/982/3	Mr Brian Jones		

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/982/2005	Brian Jones		375

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors variously argue that the proposed Development Boundary of the Village of Rhosgadfan should be realigned to exclude the above land or that it should be retained as proposed at DD stage to encapsulate it. The LPA considers that this land should be excluded from the Development Boundary and has proposed NA 306 to secure this. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0900) that the DD be modified by the acceptance of NA 306;**

**(REC.0901) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0902) that no other modification be made to the DD in response to these objections.**

## LAND NEAR MARIANFA, RHOSGADFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA308

### Unconditionally Withdrawn Objection to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/539/3	Mrs Ann Richardson		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref.
B/1652/2001	Arwyn Roberts		119
B/1220/2003	Gwilym Williams		119
B/1653/2001	DJ Pritchard		119
B/1654/2001	D&M Moon		119
B/1655/2001	Mr & Mrs G Jones		119
B/1658/2001	Paula Pink		119

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Rhosgadfan should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. The LPA agrees and proposes NA 308 to secure this. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

**RECOMMENDATION**

**I recommend:**

**(REC.0903) that no modification be made to the DD in response to these objections and, in particular, that NA 308 be not accepted.**

**NEAR FRON WYDR, RHOSGADFAN**

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/155/1</b>	<b>Iestyn Thomas</b>		



## LAND NEAR TREFLYS, RHOSTRYFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/162/1	J & G Morgan		412
B/697/1	Lleucu Roberts		412
B/884/1	Arwel Roberts		412

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary of the Village of Rhostryfan should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objectors.

### RECOMMENDATIONS

I recommend:

**(REC.0904) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0905) that no other modification be made to the DD in response to these objections.**

## DEVELOPMENT BOUNDARY, RHOSTRYFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/150/1	Mr G Dicken		411
B/536/1	Iorwerth Roberts		411

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary of the Village of Rhostryfan should be realigned to exclude areas of undeveloped land between this and the consolidated built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this sort of land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objectors.

### RECOMMENDATIONS

I recommend:

**(REC.0906) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0907) that no other modification be made to the DD in response to these objections.**

## LAND NEAR BLAEN Y WAEN, RHOSTRYFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/872/1	Nia Thomas		91

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Rhostryfan should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land is located some distance from the consolidated built-up area of the village in an entirely rural location. Development here would be contrary to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside and the creation of a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0908) that no modification be made to the DD in response to this objection.**

## LAND TO THE REAR OF CEFN HOREB, RHOSTRYFAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/648/1	Mrs Jillian Martin		410

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Rhostryfan should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0909) that no modification be made to the DD in response to this objection.**

**TREM Y WERYDD, RHOSTRYFAN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA309

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/124/1</b>	<b>D Davies</b>		<b>413</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Rhostryfan should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees and, via NA 309, proposes to extend the Development Boundary to include this land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0910) that no modification be made to the DD in response to this objection and, in particular, that NA 309 be not accepted.**

## TALYSARN IN GENERAL

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/78	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Talysarn should be realigned to exclude areas of undeveloped land between it and the edge of the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0911) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0912) that no other modification be made to the DD in response to this objection.**

**PLAS COED MADOG, TALYSARN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Draft Deposit**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/238/1</b>	<b>Gwynne Williams</b>		
<b>B/239/1</b>	<b>Heulwen Williams</b>		

## NEAR COED MADOG, TALYSARN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/925/1	ED Owen	Aled Owen	417

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Talysarn should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0913) that no modification be made to the DD in response to this objection.**



## OPPOSITE PEN Y FRON, TALYSARN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/671/4	Richard Wyn Huws	Susan Hill	418

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Talysarn should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.0914) that no modification be made to the DD in response to this objection.**

**TO THE REAR OF AWELFOR, Y GRAIG AND BRYN DYFFRYN,  
TALYSARN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA310

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/729/3	Barbara Brown		416

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2171	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary of the Village of Talysarn should be realigned to exclude the above land. The LPA agrees and proposes NA 310 to secure this. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0915) that the DD be modified by the acceptance of NA 310;**

**(REC.0916) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0917) that no other modification be made to the DD in response to these objections.**

**OPPOSITE Y CRAIG, TALYSARN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/663/1</b>	<b>Mrs E Williams</b>		

**NEAR FRON FELEN, TALYSARN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/221/3</b>	<b>K Davies</b>		

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/729/1</b>	<b>Barbara Brown</b>		

**ADJACENT TO PEN DYFFRYN, TALYSARN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/729/3</b>	<b>Barbara Brown</b>		<b>416</b>

**Unconditionally Withdrawn Objection to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/662/1</b>	<b>Mrs Eileen Hughes</b>		

**Note**

- The LPA now confirms that objection B/729/3 is unconditionally withdrawn.

**CROSS FARM, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/181/1</b>	<b>Cadwaladr Evans</b>		
<b>B/956/1</b>	<b>Mrs Williams</b>	<b>DL Hughes</b>	
<b>B/530/1</b>	<b>Jaqcueline &amp; Neil Griffith</b>		

## NEAR CWT YR HERS, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/1 1	Waunfawr Community Council		426

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is in an entirely rural location, remote from the consolidated built-up area of the village. Its development would not conform to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0918) that no modification be made to the DD in response to this objection.**



## CEFN Y WAUN, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/294/1	Mr Gwyn Parry		426

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land is in an entirely rural location, detached from the consolidated built-up area of the village. Development would not conform to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0919) that no modification be made to the DD in response to this objection.**

## GERDDI CEFN, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA311

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/3	Waunfawr Community Council		434

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/839/2007	Sally Miles	RPS Planning	434 & 171 & 438

### Note

- Objection B/839/2007 is dealt with in the section of this report which relates to land near Nant y Mynydd, Waunfawr.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees with the objector and proposes NA 311 in response. The additional land proposed for inclusion is previously developed land. However, for the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement, notwithstanding the nature of the particular site.

**RECOMMENDATION**

**I recommend:**

**(REC.0920) that no modification be made to the DD in response to this objection and, in particular, that NA 311 be not accepted.**

## THE HAVEN, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/1 6	Waunfawr Community Council		429

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0921) that no modification be made to the DD in response to this objection.**

**ADJACENT TO COLLFRYN AND THE HAVEN, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA314

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/47/1	Wynne Griffith		429

**Objections to Pre Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref.
B/756/2150	Environment Watch Wales & the Borders		112
B/839/2009	Sally Miles	RPS Planning	429 & 171

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and seeks to secure this via NA 314. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0922) that no modification be made to the DD in response to these objections and, in particular, that NA 314 be not accepted.**

**NEAR NANT Y MYNYDD, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections**

<b>Objection ref. No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref.</b>
<b>B/718/5</b>	<b>PD Basterfield</b>		<b>430</b>
<b>B/839/5</b>	<b>Sally Miles</b>	<b>RPS Planning</b>	<b>171</b>
<b>B/839/6</b>	<b>Sally Miles</b>	<b>RPS Planning</b>	<b>171</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0923) that no modification be made to the DD in response to these objections.**

**FIELD BELONGING TO PANT GWYN, GROESLON WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/656/1</b>	<b>John Davies</b>		

**Note**

- Objection B/656/1 is responded to in LPA proof 608.

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Waunfawr should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land is in an entirely rural location adjacent to a small sporadic development. The construction of an additional dwelling would not conform to the advice of PPW (paragraphs 9.3.6 and 9.3.1) that development in the open countryside should be strictly controlled and that a fragmented pattern of settlement should be avoided.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.0924) that no modification be made to the DD in response to this objection.**

**PLAY AREAS: CAERNARFON DCA**



## PLAY AREAS – DINAS DINLLE

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1231/3	Kevin Williams		347

### Main Issue

- Whether the DD is appropriate, having regard to the protection from development of areas of recreational value.

### Inspector's Considerations and Conclusions

1. The objector expresses concern that a specific area of recreational value is not shown as a protected play area on the Proposals Map for Dinas Dinlle. This area is located outside the Development Boundary of that settlement. The supporting text for Policy CH40 confirms that its protection applies not only to the areas shown on the Proposals Map (i.e. those within Development Boundaries) but also to those outside the built form of towns and villages.

### RECOMMENDATION

**I recommend:**

**(REC.0925) that no modification be made to the DD in response to this objection.**

## GERDDI BACH, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA313

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/1	Waunfawr Community Council		432

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2149	Environment Watch Wales & the Borders		111

### Main Issue

- Whether the DD is appropriate, having regard to the prospects for implementation during the plan period.

### Inspector's Considerations and Conclusions

1. This land has been designated in the DD as a 'protected play area'. The local Community Council, as land owner, confirms that this land is no longer used as a play area. Because other, more conveniently located, sites are available for use as play areas it does not intend to invest in the provision and maintenance of recreational facilities on this site. 'Unitary Development Plans – Wales' (paragraph 1.23) advises that the provision made for development and infrastructure in UDPs should be realistic and likely to be implemented during the plan period. This will assist in keeping blight to a minimum. Because there is no realistic prospect that recreation facilities will be provided or maintained on this site during the plan period I conclude that the land should not be protected for this purpose. I note that the LPA proposes, via NA 313, to delete the 'protected play area' designation.

### RECOMMENDATIONS

I recommend:

**(REC.0926) that the DD be modified by the acceptance of NA 313;**

**(REC.0927) that no other modification be made to the DD in response to these objections.**

**HIGHWAYS: CAERNARFON DCA**

## PAVEMENT AT CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/14	Waunfawr Community Council		265

### Main Issue

- Whether the DD is appropriate, having regard to the scope of a Unitary Development Plan

### Inspector's Considerations and Conclusions

1. The objector argues that land beside the A4085 highway should be included within the Development Boundary of Caeathro in order that a pavement can be constructed. The Development Boundary, as proposed in the DD, does in fact include this area. The provision of particular lengths of pavement is not a matter for the UDP. However, one could be secured via a condition attached to a relevant planning permission so long as this conformed to the advice of Circular 35/95.

### RECOMMENDATION

I recommend:

**(REC.0928) that no modification be made to the DD in response to this objection.**

## NORTHERN RELIEF ROAD, PENYGROES

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA382

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/756/2169	Environment Watch Wales & the Borders		111

### Main Issue

- Whether the DD is appropriate, having regard to the framework of national planning policy and guidance.

### Inspector's Considerations and Conclusions

1. The LPA, at Pre-inquiry Proposed Change stage, proposes, via NA 382 and NA 176, to safeguard from other development the land which is required for the construction of the Penygroes Northern Relief Road. The objector is concerned that the construction of this road would increase local traffic levels and harm the rural environment and the open character of the countryside.

2. The LPA has identified this as its preferred route for a new road to accommodate a flow of heavy vehicles to and from a waste management site and, in particular, to direct these away from the highways which pass through a series of villages. PPW (paragraph 8.5.2) advises that where LPAs wish to safeguard land for transport infrastructure, including schemes identified within the Local Transport Plan, they should do so through a proposal in the UDP. When the precise route is not known a safeguarding policy may be applied to the area of land necessary for the scheme. Blight should be kept to a minimum by including in UDPs only firm schemes on which work will commence within the plan period.

3. The LPA has confirmed, via its evidence to the inquiry, that the proposed road is not included in any implementation programme. No funding has been obtained or even applied for. There is, as I note elsewhere in this report, significant doubt over the future of a waste management facility that might justify the scheme. There is, therefore, no basis for a conclusion that this is a firm scheme on which work will commence within the plan period. Whatever the merits of the scheme in traffic and environmental terms the UDP should not safeguard land for its construction.

### RECOMMENDATION

I recommend:

**(REC.0929) that the DD be not modified by the acceptance of NA 176 and NA 382.**

## A4085, WAUNFAWR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1043/5	Waunfawr Community Council		428

### Main Issue

- Whether the DD is appropriate, having regard to the framework of national planning policy guidance.

### Inspector's Considerations and Conclusions

The objector argues that traffic roundabouts should be installed in two locations on the A4085 road within the Village of Waunfawr. Since the publication of the DD and the Pre-inquiry Proposed Changes one of the relevant junctions has been improved. That aspect of the objection has been overtaken by events. In respect of the other junction no firm commitment has been made by the Local Highway Authority to its improvement. Having regard to the advice of 'Unitary Development Plans – Wales' (paragraph 1.23) that the provision made in development plans should be realistic and likely to be implemented during the period of the plan, it is not appropriate for reference to be made to this scheme in the UDP.

### RECOMMENDATION

I recommend:

**(REC.0930) that no modification be made to the DD in response to this objection.**

**NEAR FORMER POST OFFICE, WAUNFAWR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1043/6</b>	<b>Waunfawr Community Council</b>		<b>428</b>

**Note**

- Objection B/1043/6 is dealt with in the section of this report which relates to the A4085, Waunfawr.

**HOLIDAY PARKS: CAERNARFON DCA**



## GLAN GWNA, CAEATHRO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/948/4	Mr Myfyr Jones	Berwyn Owen	493

### Main Issue

- Whether the DD is appropriate, having regard to the control of development on self-serviced holiday parks.

### Inspector's Considerations and Conclusions

1. The objector argues that self-serviced holiday parks should be accorded their own specific land-use designation in the UDP. He expresses concern that where such parks are classified as being located within the countryside, the policies of the plan, read as a whole, could inhibit necessary and desirable development upon them.

2. The DD does, however, make specific provision for future development within such areas. Policy D14 provides that proposals for new development to provide self-serviced holiday accommodation or the extension of existing establishments will be approved provided that stated criteria are satisfied. These criteria envisage the approval of such proposals on sites outside of Development Boundaries (i.e. in the Countryside) in stated circumstances. There is, therefore, no need for a specific designation on the proposals map. The policy would be applied having regard to the planning history of the site. Given the advice of PPW that UDPs should promote a sustainable pattern of settlement, it would not be appropriate for the LPA to make provision for the range of development types to be widened on such sites, where they are located in the countryside.

### RECOMMENDATION

I recommend:

**(REC.0931) that no modification be made to the DD in response to this objection.**

**SITE-SPECIFIC OBJECTIONS: DOLGELLAU/ABERMAW DCA**

**SETTLEMENT STATUS: DOLGELLAU/ABERMAW DCA**

## ARTHOG SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA370

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/988/1	Mrs Julie Hodgson	Geraint Lewis Associates	442

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2166	Environment Watch Wales & the Borders		109

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. In response to an objection at DD stage the LPA proposes, via NA 370, to classify as a Village a group of 8 dwellings adjacent to Morfa Mawddach railway station. This is a small, isolated, sporadic development in the open countryside. Only the most minimal level of supporting services and facilities are available in the locality and these are, for the most part, accessible only by car. The encapsulation of these houses within a Development Boundary would stimulate additional development which would reinforce what is already an unsustainable pattern of settlement.

### RECOMMENDATION

I recommend:

**(REC.0932) that no modification be made to the DD in response to these objections and, in particular, that NA 370 be not accepted.**

**OMISSION OF HOUSING ALLOCATIONS: DOLGELLAU/ABERMAW DCA**

## LAND AT GRAIG FACH, CHURCH STREET, BARMOUTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/930/1	Dishland Ltd	Derek Prosser	441

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land, which is proposed to be included within the Development Boundary of the Local Centre of Barmouth, should be allocated for housing development because no other such allocations are made within the Dolgellau/Abermaw DCA and these are considered to be necessary in order to support future economic development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0933) that no modification be made to the DD in response to this objection.**

**DEVELOPMENT BOUNDARIES: DOLGELLAU/ABERMAW DCA**

## LAND NEAR TAI CROSIO, LLANABER, BARMOUTH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/659/1	Hugh Gareth & Elizabeth Edwards		439

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Local Centre of Abermaw should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.0934) that no modification be made to the DD in response to this objection.**



## RAILWAY LAND, BARMOUTH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA368

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/12	Network Rail Infrastructure Ltd		440

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Abermaw should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.0935) that no modification be made to the DD in response to this objection.**

## STATION ROAD, FAIRBOURNE

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA369

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/674/1	Glyn Williams		458
B/1225/11	Network Rail Infrastructure Ltd		458

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Fairbourne should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. This site is previously developed land which accommodates a disused building. The railway line to the east forms a definitive boundary to the settlement. The site is clearly part of the built-up area. For these reasons I conclude that this site should be included within the Development Boundary in accordance with NA 369.

### RECOMMENDATIONS

I recommend:

**(REC.0936) that the DD be modified by the acceptance of NA 369;**

**(REC.0937) that no other modification be made to the DD in response to these objections.**

**SITE-SPECIFIC OBJECTIONS: FFESTINIOG DCA**

**HOUSING LAND ALLOCATIONS: FFESTINIOG DCA**

## **GWYLFA GARAGE SITE – BLAENAU FFESTINIOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### **Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/693/3</b>	<b>Dafydd Gwallter Dafis</b>		<b>446</b>

### **Main Issue**

- Whether the DD is appropriate, having regard to the prospects for a residential development of the land within the plan period.

### **Inspector's Considerations and Conclusions**

1. The LPA, at DD stage, proposes that 0.18ha of land at the Gwylfa Garage Site, Blaenau Ffestiniog be allocated for the development of 6 dwellings. The site is occupied by a former chapel which was, in the past, converted to a garage. After a period of disuse it is again used for this latter purpose. The objector argues that, having regard to its current use, the site is unlikely to be available for housing development.

2. The LPA confirms, however, that during 2005 an application for outline planning permission was submitted to build 7 houses on this land. At the time of this inquiry the LPA had resolved to approve this, subject to the completion of a related planning obligation. This indicates that there is a reasonable prospect that the residential development of this land will be promoted during the plan period.

### **RECOMMENDATION**

**I recommend:**

**(REC.0938) that no modification be made to the DD in response to this objection.**

## NEAR CONGL Y WAL, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/27	CPRW		451

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/1229/1	RG & Mrs M Jones		
B/1230/1	AW & Mrs V Hughes		

### Main Issue

- Whether the DD is appropriate, having regard to the effect of development on the rural setting of Blaenau Ffestiniog.

### Inspector's Considerations and Conclusions

1. The LPA proposes, at DD stage, that 1.2ha of land near Congl y Wal, Blaenau Ffestiniog, be allocated for the development of 30 dwellings. The objector notes that this site is located at the extreme southern end of the town and argues that its development would unacceptably erode its rural setting. The LPA argues that Blaenau Ffestiniog, as an Urban Centre, contains a wide range of services, facilities, employment opportunities and public transport links. I agree that these are sufficient in variety and quantity to characterise the town as a sustainable location for development, and to support additional housing development without stimulating an unacceptable level of trips by private car.

2. The town is, however, closely confined by the mountainous slopes and slate tips that rise from the very threshold of the built-up area. It is also constrained by land identified as at risk from flooding. I recognise that this, together with the need to retain existing open spaces within the town for their leisure and amenity value in a tightly developed urban area, has made the identification of suitable housing sites a very difficult exercise.

3. The land at Congl y Wal is, however, located at the very end of a long finger of development. It is further from the public transport hub, shops and other facilities than any other part of the town. Crucially the site is visually separated from the built-up area by rising land to the north of it. When viewed from near and distant vantage points from the south it is seen within an entirely open and wild rural landscape. It cannot be seen from the town and the town cannot be seen from it.

4. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. The expansion of towns should avoid creating a fragmented pattern of development. This site is quite simply not well related to the main body of the town. Its development would create a visually isolated pocket of housing within a landscape cell that is otherwise almost completely devoid of such development. It could not help but be perceived as an incongruous and intrusive development contrary to PPW advice.

5. Given the location of the site on the open slopes of rising land, and the multiplicity of vantage points from which development upon it could be seen, I consider that landscaping would have very little beneficial effect in mitigating the visual impact of new development in this location. The degree of potential harm to the rural setting of Blaenau Ffestiniog is, in my view, so pronounced that it justifies the deletion of this proposed allocation notwithstanding the need to take advantage of the sustainable characteristics of Blaenau Ffestiniog as a whole.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0939) that the DD be modified by the deletion of the proposed housing allocation near to Congl y Wal, Blaenau Ffestiniog;**

**(REC.0940) that no other modification be made to the DD in response to this objection.**

## NEAR CAE CLYD – BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA363

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/158/1	Tecwyn Williams		444

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2097	CPRW		444

#### Note

- Objection B/158/1 has not been conditionally withdrawn.

#### Main Issue

- Whether the DD should be modified by the acceptance of Pre-inquiry Proposed Change NA 363 having regard to the effect of development on the rural setting of Blaenau Ffestiniog.

#### Inspector's Considerations and Conclusions

1. In response to an objection at DD stage the LPA proposes, via NA 363, to extend the Development Boundary and allocate 0.59ha of land near to Cae Clyd, Blaenau Ffestiniog, for the development of 15 dwellings. A further objector argues that the site is at the edge of the built-up area of the settlement and would extend development into a predominantly rural landscape.

2. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. Due to the constraints of topography, principally the proximity of steep mountain sides and tips of slate waste, the built-up area of Blaenau Ffestiniog has taken a linear form. The principal finger of development follows the A470 road southwards from the town centre. The land near Cae Clyd is near the end of a group of dwellings which extends to the end of this, some 1.5km to the south of the town centre. It is bounded on the north, north east, south east and west by dwellings or other urban uses. Its development would be perceived as a consolidation of the built-up area rather than an extension to it. It would, therefore, conform very largely to PPW advice.

3. Blaenau Ffestiniog, as I note in the section of this report which relates to land near Congl y Wal, has the capacity to support a sustainable pattern of settlement because of the range of services available there and the potential to



gain access to these via public transport. In my view the impact of development on the rural setting of the town would be very limited and is outweighed by the advantages to be derived from locating new housing in a sustainable settlement. The objector, in his response to the LPA's proof of evidence, argues that the area of land shown by the LPA in that document has slightly different boundaries from that which was the subject of his duly made objection. I confirm that my consideration and conclusions relate to that area which is shown on the plan submitted with objection B/158/1.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0941) that the DD be modified by the acceptance of NA 363 subject to the detailed site boundaries conforming to those presented in the plan submitted with objection B/158/1;**

**(REC.0942) that no other modification be made to the DD in response to these objections.**

**OMISSION OF HOUSING LAND ALLOCATIONS: FFESTINIOG DCA**

**NEAR MAESNEUADD, PENCEFN, BLAENAU FFESTINIOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/693/6</b>	<b>Dafydd Gwallter Dafis</b>		<b>63</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Blaenau Ffestiniog and be allocated for housing development to meet an identified need because it is previously developed land. Paragraph 2.7.1 of PPW notes that not all previously developed land is suitable for development because of its location.

2. This site is separated by a highway from the consolidated built-up area of the settlement. Its development would extend this into the open countryside, promoting a ribbon development contrary to the advice of PPW (paragraph 9.3.1). Part of the site is, in any case, within an area that has been identified as a C2 flood risk zone. TAN15 advises that residential premises are categorised as highly vulnerable to flooding. Within the C2 zone development plan allocations should not be made for such development. For these reasons I conclude that this land should not be included in the Development Boundary or allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.0943) that no modification be made to the DD in response to this objection.**

**DEVELOPMENT BOUNDARIES: FFESTINIOG DCA**

## CWM BOWYDD, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA365

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/687/4	Ffestiniog Community Council		448

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

### Inspector's Considerations and Conclusions

1. The objector argues that a cluster of dwellings at the Cwm Bowydd Estate should be included within the Development Boundary of the Urban Centre of Blaenau Ffestiniog. This is a densely developed residential area which, although it is separated from the consolidated built-up area of Blaenau Ffestiniog, is within easy walking distance of its town centre facilities. Development there would promote a sustainable pattern of settlement. For this reason it should be enclosed by a Development Boundary. The LPA proposes to achieve this via NA 365.

### RECOMMENDATIONS

I recommend:

**(REC.0944) that the DD be modified by the acceptance of NA 365;**

**(REC.0945) that no other modification be made to the DD in response to this objection.**

## DOLRHEDYN AREA, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA364

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/687/3	Ffestiniog Community Council		447

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/969/2039	Welsh Water		447

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

### Inspector's Considerations and Conclusions

1. The objector argues that a cluster of dwellings at Dolrhedyn should be included within the Development Boundary of the Urban Centre of Blaenau Ffestiniog. The LPA agrees with the objector and proposes, via NA 364, to include that area within the Development Boundary. The dwellings at Dolrhedyn form a small and loosely related group near to the end of a long finger of ribbon development that extends some 2km from the centre of Blaenau Ffestiniog. Their encapsulation within the Development Boundary would promote a fragmented pattern of settlement and reinforce ribbon development contrary to the advice of PPW (paragraph 9.3.1). For this reason I conclude that this area should not be enclosed by a Development Boundary.

### RECOMMENDATION

I recommend:

**(REC.0946) that no modification be made to the DD in response to this objection and, in particular, that NA 364 be not accepted.**

## GARDD MELIN Y MOELWYN, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP 68

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/693/4	Dafydd Gwallter Dafis		63

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

### Inspector's Considerations and Conclusions

1. The objector argues that the Development Boundary of the Urban Centre of Blaenau Ffestiniog should be extended to include this land. The LPA agrees that it would be a reasonable extension of the town's built form but is concerned that it may not be possible to provide a safe vehicular access. The plan must be read as a whole. Policy CH31 provides that planning permission will be granted for development proposals only if a safe vehicular access can be provided. This policy would prevent harm to the safe and free flow of traffic if a particular scheme could not overcome this constraint. No harm could, therefore, arise from the encapsulation of the site within the Development Boundary. For this reason I conclude that the DD should be modified to secure this. I note that the LPA has proposed NAP 68 to this end.

### RECOMMENDATIONS

I recommend:

**(REC.0947) that the DD be modified by the inclusion of the land at Gardd Melin y Moelwyn, Blaenau Ffestiniog, within the Development Boundary;**

**(REC.0948) that no other modification be made to the DD in response to this objection.**

**NEAR MAESYNEUADD, BLAENAU FFESTINIOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA366

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/693/1	Dafydd Gwallter Dafis		449

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2164	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Urban Centre of Blaenau Ffestiniog should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and seeks to achieve this via NA 366. This area consists of a small sporadic development within the open countryside at the extreme south western edge of the settlement. It is surrounded by open countryside on all sides except its northern extremity where it abuts the edge of an industrial estate. It is not well connected to the built-up area and its inclusion within the Development Boundary would promote the reinforcement of a long ribbon of development contrary to the advice of PPW (paragraph 9.3.1). For these reasons I conclude that this land should not be included within the Development Boundary.

**RECOMMENDATION**

**I recommend:**

**(REC.0949) that no modification be made to the DD in response to these objections and, in particular, that NA 366 be not accepted.**



**NEAR THE ROLLER-BLADING PARK, GLANYPWLL**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA361

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/687/1</b>	<b>Ffestiniog Community Council</b>		<b>443</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Urban Centre of Blaenau Ffestiniog should be re-aligned to include this land. Most of the site has been developed for leisure uses and a small part remains unused. It is adjacent to the centre of the town and its further development would reinforce a sustainable pattern of settlement. For these reasons I conclude that the Development Boundary should be extended to include it. I note that the LPA proposes NA 361 to achieve this.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0950) that the DD be modified by the acceptance of NA 361;**

**(REC.0951) that no other modification be made to the DD in response to this objection.**

**HIGHWAYS: FFESTINIOG DCA**

## A470, BLAENAU FFESTINIOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA367

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/325/1	Gwynedd Council Highways Consultancy		450

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2165	Environment Watch Wales & the Borders		111

### Main Issue

- Whether the DD is appropriate, having regard to the integration of the Written Statement and the Proposals Map.

### Inspector's Considerations and Conclusions

1. DD Policy CH24 provides that land shown on the Proposals Map which is required for road improvements will be safeguarded from other development. Among the schemes listed is that for the upgrading of the A470 from Blaenau Ffestiniog to Cancoed. An objector notes that this is not shown on the Proposals Map. The LPA confirms that this was omitted in error and proposes, via NA 367, to indicate the land to be safeguarded on the Proposals Map. I agree that this is necessary in the interests of comprehension. A further objector, at Pre-inquiry Proposed Change stage argues that the improvement of the road would generate extra vehicle movements which would have a harmful effect on the environment.

2. This proposal was, however, made at DD stage and was not subject to objection then. No change has been made to the proposal at Pre-inquiry Proposed Change stage, simply the recognition of the need to show it diagrammatically on the Proposals Map. 'Unitary Development Plans – Wales' (paragraph 3.21) advises that, in the event of a contradiction between the Written Statement and the Proposals Map the provisions of the Written Statement shall prevail. For these reasons I consider that little weight should be given to the argument presented at Pre-inquiry Proposed Change stage.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0952) that the DD be modified by the acceptance of NA 367;**

**(REC.0953) that no other modification be made to the DD in response to these objections.**

**SITE-SPECIFIC OBJECTIONS: LLYN DCA**

**SETTLEMENT STATUS: LLYN DCA**

## BODUAN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA344

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/677/1	Councillor Robert G Edwards		480

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2096	CPRW		
B/756/2161	Environment Watch Wales & the Borders		109

#### Note

- Objection B/844/2096 is responded to in LPA proof 599.

#### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

#### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Boduan be regarded as part of the open countryside. An objector argues that it should be reclassified as a Rural Village. The LPA agrees and proposes NA 344 to achieve this. It considers that the availability of a bus service justifies this status. Such an approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. The area proposed for designation as a Rural Village is nothing more than a loose sporadic development in the open countryside. Physically it is not a settlement. Designation as a Rural Village would simply reinforce an unsustainable pattern of settlement contrary to the advice of PPW.

#### RECOMMENDATION

I recommend:

**(REC.0954) that no modification be made to the DD in response to these objections and, in particular, that NA 344 be not accepted.**

## BWLCHTOCYN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/272/4	Lowri Owen		



## GROESLON, DINAS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/304/1	Esyllt Rhys Jones		562
B/60/1	Dewi Rhys		562

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. Groeslon is classified by the DD as a Rural Village. The objectors argue that particular existing dwellings should or should not be regarded as forming part of it. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I have concluded that the areas proposed to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms. I consider that these reasons justify both the non-expansion of Rural Villages and the removal from this classification of those areas that have been proposed for this at DD stage.

### RECOMMENDATIONS

I recommend:

**(REC.0955) that the DD be modified in accordance with my REC.0451;**

**(REC.0956) that no other modification be made to the DD in response to these objections.**

## LLANARMON SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA345

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/352/1	Llanystumdwy Community Council		492

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2162	Environment Watch Wales & the Borders		109

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Llanarmon be regarded as part of the open countryside. An objector argues that it should be reclassified as a Rural Village. The LPA agrees and proposes NA 345 to achieve this. It considers that the availability of a bus service justifies this status. Such an approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. The area proposed for designation as a Rural Village is nothing more than a small sporadic development in the open countryside. It is not a settlement in any sense of the word. Designation as a Rural Village would simply reinforce an unsustainable pattern of settlement contrary to the advice of PPW.

### RECOMMENDATION

I recommend:

**(REC.0957) that no modification be made to the DD in response to these objections and, in particular, that NA 345 be not accepted.**

## LLANENGAN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/11	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. Llanengan is proposed, in the DD, to be classified as a Village. The objector argues that it is not of sufficient size to be accorded that status and, even if it was, that the Development Boundary is too loosely drawn. The settlement contains a Church, a community centre and a bus service. Although at a minimal level, the facilities there do justify retention of Village status for this settlement. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house-building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and the Urban Centres. I consider that these arguments justify the exclusion from this settlement of undeveloped land between the Development Boundary and the edge of the built-up area. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.0958) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.0959) that no other modification be made to the DD in response to this objection.**

## LLANIESTYN SETTLEMENT STATUS & DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/814/1	J Hughes-Jones		491
B/816/1	Marian Hughes-Jones		491
B/817/1	David Fuller		491

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the Rural Village.

### Inspector's Considerations and Conclusions

1. The objectors argue that the Llaniestyn Garage should be identified as one of the buildings which define this Rural Village. These premises are, however, situated a considerable distance from the defined core of the settlement. Identification of the garage as a component of the Rural Village would promote development in the open countryside contrary to the advice of PPW that UDPs should reinforce a sustainable pattern of settlement.

### RECOMMENDATION

I recommend:

**(REC.0960) that no modification be made to the DD in response to these objections.**

## LLWYNHUDOL SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA346

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/939/1	Dr & Mrs HM Davies		477

### Note

- Objections B/288/4, B/288/5, B/288/1 and B/288/3 are dealt with in this section of the report.

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Llwynhudol be regarded as part of the open countryside. The objectors argue that it should be reclassified as a Rural Village. The LPA agrees and proposes NA 346 to achieve this. It considers that the availability of a bus service justifies this status. Such an approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. The area proposed for designation as a Rural Village is nothing more than a sporadic development in the open countryside. It is not a settlement in any sense of the word. Designation as a Rural Village would simply reinforce an unsustainable pattern of settlement contrary to the advice of PPW.

### RECOMMENDATION

I recommend:

**(REC.0961) that no modification be made to the DD in response to these objections and, in particular, that NA 346 be not accepted.**

## PENYGROESLON SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/634/1	Ifor Owen		598

### Note

- Objection B/634/1 is responded to in LPA proof 594, not 598.

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the Rural Village.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Penygroeslon be classified as a Rural Village. The objector argues that an area of land at the eastern edge of the settlement some 0.5 ha in extent should be developed by the erection of affordable homes. PPW (paragraph 9.1.2) advises that LPAs should promote the most efficient use of land. At the densities that are compatible with that advice the objector's site would accommodate some 15 to 20 dwellings. The existing settlement of Penygroeslon contains only some 9 dwellings. Development of the land proposed by the objector would be inconsistent with the character of the settlement and would promote a significant growth in the number of households in an area remote from services and facilities. It would reinforce an unsustainable pattern of settlement contrary to the advice of PPW. For this reason this Rural Village should not be extended as the objector seeks.

### RECOMMENDATION

**I recommend:**

**(REC.0962) that no modification be made to the DD in response to this objection.**

## RHIW SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/7	Aberdaron Community Council		

### Note

- Objection B/575/7 is responded to in LPA proof 596.

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA proposes, at DD stage, that Rhiw be classified as a Rural Village. The objector argues that the facilities available there justify its re-classification as a Village. One of these, the shop at Plas y Rhiw, is within a local tourist attraction. It cannot be considered to be a retail outlet serving the community. The remaining facilities, a village hall and a bus service, cannot be regarded as sufficient to support the additional development that re-classification as a Village would promote. Such action would, therefore, reinforce an unsustainable pattern of settlement, contrary to the advice of PPW.

### RECOMMENDATION

I recommend:

**(REC.0963) that no modification be made to the DD in response to this objection.**

## RHOSFAWR SETTLEMENT DESIGNATION

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/305/1	George Newsham		

### Note

- Objection B/305/1 is responded to in LPA proof 597.

### Main Issue

- Whether the DD is appropriate, having regard to the extent of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, classifies Rhosfawr as a Rural Village. The objector argues that additional dwellings should be identified as forming part of this in order that his land, which lies adjacent to them, can be considered for development. For the reasons I give in the section of this report which relates to 'Affordable Housing for Local Need Text' I have concluded that the areas proposed to be classified as Rural Villages should, instead, be regarded simply as part of the open countryside in policy terms. I consider that these reasons justify both the non-expansion of Rural Villages and the removal from this classification of those areas that have been proposed for this.

### RECOMMENDATIONS

I recommend:

**(REC.0964) that the DD be modified in accordance with my (REC.0451);**

**(REC.0965) that no other modification be made to the DD in response to this objection.**



## SARN MELLTEYRN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/3	Environment Watch Wales & the Borders		115

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/51/1	Dennis & Irene Spencer		

### Main Issue

- Whether the DD is appropriate, having regard to the status of this settlement.

### Inspector's Considerations and Conclusions

1. Sarn Mellteyrn is proposed, in the DD, to be classified as a Village. The objector argues that it is not of sufficient size to be accorded this status and, even if it is, that the Development Boundary is too loosely drawn. The settlement contains two public houses, a garage, and has a bus service. Although at a minimal level, the facilities there do justify retention of Village status for the settlement.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion from this settlement of undeveloped land between the Development Boundary and the edge of the built-up area. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0966) that the DD be modified in accordance with my recommendation (REC.0443)**

**(REC.0967) that no other modification be made to the DD in response to this objection.**

**CAE'R ORSEDD, TREFOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/545/1</b>	<b>Brian Hill</b>		<b>567</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the status of the settlement.

**Inspector's Considerations and Conclusions**

1. The objector seeks the classification of a particular area as a Rural Village. This is, however, no more than a small, isolated, sporadic development in the open countryside. Classification as a Rural Village would stimulate additional development and reinforce an existing unsustainable pattern of settlement contrary to the advice of PPW.

**RECOMMENDATION**

**I recommend:**

**(REC.0968) that no modification be made to the DD in response to this objection.**

## UWCHMYNYDD & RHYDLIOS SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA347

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/10	Aberdaron Community Council		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/2163	Environment Watch Wales & the Borders		109

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that Uwchmynydd be regarded as part of the open countryside. The objector argues that it should be re-classified as a Rural Village. The LPA agrees and proposes NA 347 to achieve this. It confirmed at the relevant inquiry session that the availability of a bus service justifies this status. Such an approach is, however, fundamentally flawed because it would open the way to residential development along the line of all the bus routes in the LPA area, however remote the site from facilities and services. It would expose virtually the whole of the countryside to the prospect of residential development. The area proposed for designation as a Rural Village is nothing more than a small, loose, sporadic development in the open countryside. It is not a settlement in any sense of the word. Designation as a Rural Village would simply reinforce an unsustainable pattern of settlement contrary to the advice of PPW.

### RECOMMENDATION

I recommend:

**(REC.0969) that no modification be made to the DD in response to these objections and, in particular, that NA 347 be not accepted.**

**HOUSING GENERAL: LLYN DCA**

## GENERAL HOUSING IN ABERDARON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/6	Aberdaron Community Council		560

### Note

- The matters raised by this objector are dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text'.

## GENERAL HOUSING IN ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/731/10	Iwan Edgar		564

### Main Issue

- Whether the DD is appropriate, having regard to the level of house-building that is proposed for the Village of Abersoch.

### Inspector's Considerations and Conclusions

1. The LPA does not allocate land for house-building in the Village of Abersoch. The objector argues that the level of house-building should be increased there. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Furthermore for the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that these arguments justify not extending the Development Boundary of this settlement or making housing land allocations there.

### RECOMMENDATION

I recommend:

**(REC.0970) that no modification be made to the DD in response to this objection.**

**HOUSING LAND ALLOCATIONS: LLYN DCA**



## NEAR TY'N Y FRON - ABERERCH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA324

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/731/6	Iwan Rhys Edgar		95
B/540/1	William Arthur Jones & Ceri Jones		96
B/541/1	WA & RI Jones		96
B/794/1	Caren Jones		96
B/1328/1	W A Jones		96

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/1	Welsh Water		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2089	CPRW		96
B/922/2005	T Banks		96

### Main Issues

- The need for housing development in Abererch.
- The effect of development on adjacent farming operations.
- The relationship of the proposed development to settlement form.
- The availability of necessary infrastructure and services.
- The proportion of affordable housing on the site.

### Inspector's Considerations and Conclusions

#### *The need for housing development in Abererch*

1. The LPA, at DD stage, proposes to allocate 0.57ha of land near Ty'n y Fron, Abererch, for the development of 12 dwellings. An objector argues that, because there are at present several houses for sale in the village, there is no need for additional construction. Houses for sale are a natural aspect of a functioning housing market. They do not indicate a lack of need or demand but simply that particular occupiers seek to move to a different place or type of dwelling. Abererch has a school, post office/shop and a bus service to the employment, retail, social and other facilities of Pwllheli only 2km distant. It must be regarded as a reasonably sustainable location for a limited number of new dwellings.

*The effect of development on the adjacent farming operations*

2. An objector argues that development of the proposed allocation would bring dwellings up to the boundary of his farm holding at a point where outbuildings accommodate livestock. He experiences trespass and the dumping of rubbish on his land at present and is fearful that further residential development in the vicinity would intensify this. The LPA agrees that it is necessary to leave a gap between the proposed dwellings and the boundary of this agricultural holding. It proposes to secure this via Pre-inquiry Proposed Change NA 324 which would exclude the eastern half of the area from the Development Boundary and delete it from the housing allocation. This would leave an area of 0.25ha with a capacity of 6 dwellings. This would effect a marginal reduction in the potential for harmful impact on the adjacent farming operation.

*The relationship of the proposed development to settlement form*

3. An objector argues that the proposed allocation does not relate well to the built-up area of the village. PPW (paragraph 9.3.1) advises that new housing should be well integrated with and connected to the existing pattern of settlement. In this case the proposed allocation at both DD and Pre-inquiry Proposed Change stages would abut the built-up area of the village along only one side and part of another. For the most part it would project into the adjacent countryside eroding the established rural setting of the Village. Although, as I have noted, Abererch does contain a number of essential facilities to which access can be gained on foot, the benefits to be gained from additional residential development are not so compelling as to justify the clear and significant visual harm to the rural setting of the Village which would arise from development of a site which is poorly integrated in visual terms with adjacent land uses. This, in its own right, is sufficient to justify deletion of this proposed allocation as a whole.

*The availability of necessary infrastructure and services*

4. Objectors argue that the road access, water supply, sewerage services and school capacity is not sufficient to support additional housing development. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access and the existing road network is of sufficient standard to deal with the flow of traffic. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to support it. Policy CH35 makes provision for developer contributions towards necessary educational capacity if such needs cannot be met at an existing school.

*The proportion of affordable housing on the site*

5. An objector argues that the total number of dwellings proposed for the site is too low and that the proportion of affordable housing on the allocation are too high. These factors would, in his view, inhibit the development of the site. The UDP, as subject to NA 157, clarifies that the affordable housing figures are expressed as an indicative target which will be the subject of discussion with potential developers at planning application stage.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0971) that the DD be modified by the deletion of the proposed housing allocation near Ty'n y Fron, Abererch and the exclusion of this area from the Development Boundary of the village and, in particular, that NA 324 be not accepted;**

**(REC.0972) that no other modification be made to the DD in response to these objections.**

## NEAR TY GWYN - ABERERCH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA323

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/922/1	T Banks	Mr Mike Banks	96

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/922/2004	T Banks		
B/969/2031	Welsh Water		

### Main Issue

- Whether the DD should be modified by the acceptance of Pre-inquiry Proposed Change NA 323, having regard to the effect on the character and appearance of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, via NA 323, proposes that 0.23ha of land near Ty Gwyn, Abererch, be allocated for the development of 6 dwellings. It does so because it has proposed, via NA 324, the deletion of an equivalent area from the proposed DD allocation near Ty'n y Fron, and wishes to maintain the number of dwellings for which land is allocated in that village.

2. Although I have concluded in relation to the latter site that Abererch is a reasonably sustainable location for a limited number of new dwellings, the UDP makes clear that the spatial basis for the calculation of housing requirement is the plan area as a whole. The overall estimate of new dwellings needed is assigned to Dependency Catchment Areas, but nowhere in the plan is it intended or even suggested that house building needs should be calculated for settlements as small as individual Villages and that such needs must be met there. There is, therefore, no compelling reason why a reduction in the number of allocated units on one site in a small Village should be compensated for by a new allocation in the same settlement.

3. The LPA argues that the development of the land near Ty Gwyn would not extend the village into the open countryside. The site is an approximately rectangular area of land which would, however, abut the built-up form of the village on only one and a half of its four sides. Dwellings built upon it would not be encapsulated within the built form of the settlement but would project beyond it into the open countryside in an area which is proposed to be designated as a

Landscape Conservation Area. In combination, the extent of the visual impact and the sensitivity of the local landscape lead to my conclusion that the development would not be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) requires. This is, in my view, sufficient reason in its own right not to pursue this allocation.

## **RECOMMENDATION**

**I recommend:**

**(REC.0973) that no modification be made to the DD in response to this objection and, in particular, that Pre-inquiry Proposed Change NA 323 be not accepted.**

## NEAR STAD TY'N RHOS - CHWILOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/22/1	A & M Owen		116
B/23/1	Arwel Roberts		116
B/652/1	Arthur Evans		642
B/318/4	Graham Evans		116
B/319/3	Jean Evans		116
B/813/1	Elizabeth Beryl Jones & Jones		116
B/943/1	Mr Arwel Roberts	Berwyn Owen	116

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/4	Welsh Water		116

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/39/3	F Williams		
B/638/4	Margaret Jones		
B/63/1	Capt Hugh Davies		
B/273/3	Megan Griffith		
B/348/4	Aled Evans		
B/289/4	Ifor Williams & Eleri Wyn Williams		
B/276/1	Sandra Thomas		
B/278/1	Edwin Hughes		
B/275/1	Catherine Hughes		
B/272/3	Lowri Owen		
B/274/1	Llinos Hughes		
B/64/1	Helen Davies		
B/354/4	Menai Williams		
B/65/3	Carys Davies		

### Main Issues

- The effect of development on the linguistic character of Chwillog.
- The effect upon the rural setting of the village.
- The effect on the safe and free flow of traffic.
- The effect on residential amenity.
- The availability of necessary infrastructure.

## Inspector's Considerations and Conclusions

### *The effect of development on the linguistic character of Chwilog*

1. The LPA proposes, at DD stage, that 0.48ha of land near Stad Ty'n Rhos, Chwilog, be allocated for the development of 12 dwellings. An objector argues that there is no need for these additional dwellings because there are houses for sale in the village and they have been on the market for some time. Houses for sale are a necessary aspect of a functioning housing market. The period of time they remain unsold is often a reflection of house type and the price of the specific dwellings rather than overall demand. The estimate of the housing requirement at a UDP-wide level has identified a need for additional house building in the plan area as a whole. For the reasons I give in the section of this report which relates to land at the rear of Madryn, Chwilog, I have concluded that this village is a reasonably sustainable location for a limited number of dwellings.

2. Objectors argue that the development of the proposed allocation would increase the number of non-Welsh speaking people at Chwilog and that this would weaken cultural cohesion. For the reasons I give in the section of this report which relates to the land at the rear of Madryn I have concluded that the allocation of this land will minimise the adverse impact of development on Welsh language and culture in the plan area as a whole. Another objector argues that houses built at Chwilog should be occupied only by local people. I deal with this matter also in the section of this report which relates to the land to the rear of Madryn.

### *The effect on the rural setting of the village*

3. Objectors are concerned that development on this land would harm the rural setting of the village. PPW (paragraph 9.3.1) advises that new housing developments should be well integrated with and connected to the existing pattern of settlement. The site is bounded by the built-up area of the village on three sides. It would not extend this into the countryside or enhance the prominence of built development in the landscape. I conclude that it could be developed without demonstrable harm to the rural setting of the village as PPW advises.

### *The effect on the safe and free flow of traffic*

4. Objectors express concern that, if the proposed development was to gain access to the main road via the existing cul-de-sac of Ty'n Rhos, this would increase the traffic levels on existing estate roads to such an extent that it would cause harm to the safe and free flow of traffic. This is only one of two proposed access points identified in the LPA's Development Brief. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access to the site and the existing road network is of a sufficient standard to deal with the flow of traffic that is likely to result from the development. The UDP makes provision for the period to 2016. Read as a whole it provides the framework by which planning permission will be refused for particular schemes if at the time a planning application is made inadequate provision is made to secure the safe and free flow of traffic.

*The effect upon residential amenity*

5. Objectors are concerned that the construction of new dwellings to the rear of existing ones would impair their private enjoyment. The plan is to be read as a whole. Policy B22 provides that proposals which would have an unacceptable impact on the amenities of local communities (including the reasonable privacy of the occupiers of nearby dwellings) will be refused.

*The availability of necessary infrastructure*

6. An objector argues that there is insufficient capacity at the local sewage works to support the development. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is adequate provision of necessary infrastructure.

**RECOMMENDATION**

**I recommend:**

**(REC.0974) that no modification be made to the DD in response to these objections.**



**REAR OF MADRYN - CHWILOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA328

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/65/4	Carys Davies		192
B/619/1	Margaret Price Hughes		192
B/1029/4	Edward Elias		192
B/638/1	Margaret Jones		192
B/354/3	Menai Williams		192
B/276/4	Sandra Thomas		192
B/290/1	Helena Jones		192
B/271/1	Arwel Owen		192
B/289/1	Ifor Williams & Eleri Wyn Williams		192
B/348/3	Aled Evans		192
B/274/4	Llinos Hughes		192
B/347/1	Griffith Owen		192
B/278/4	Edwin Hughes		192
B/1343/1	Wolverhampton & Dudley Brewries	Edmund Kirby	192
B/272/1	Lowri Owen		192
B/273/4	Megan Griffith		192
B/275/3	Catherine Hughes		192

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/969/5	Welsh Water		192
B/319/4	Jean Evans		192
B/318/3	Graham Evans		192

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/64/4	Helen Davies		
B/63/4	Capt. Hugh Davies		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/177/3	G & W Jones		
B/39/1	F Williams		

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2090	CPRW		192
B/1343/2003	Wolverhampton & Dudley Breweries		192

### Notes

- Objection B/64/4 is now said by the LPA to be not unconditionally withdrawn. It is dealt with in this section and responded to in LPA proof 192.
- Objection B/652/5 is dealt with in this section of the report.

### Main Issues

- The effect of development on the promotion of a sustainable pattern of settlement.
- The effect of development on the linguistic character of Chwillog.
- The effect of development on the character and appearance of the village.
- The effect of development on the safe and free flow of traffic.
- The availability of necessary infrastructure.
- The effect on nature conservation issues.
- The effect on the living conditions of adjacent residents.

### Inspector's Considerations and Conclusions

#### *The effect of development on the promotion of a sustainable pattern of settlement*

1. The LPA proposes, at DD stage, to allocate 0.97ha at the rear of Madryn, Chwillog, for the development of 29 dwellings. An objector argues that the allocation should be extended to include additional land to the south. This would effectively double the size of the site to some 1.98ha with a capacity of about 50 dwellings.

2. Chwillog is a Village with a basic level of facilities including a post office/shop, a primary school, some limited employment opportunities and a public house. It is connected by a bus service to Pwllheli and Porthmadog. It must be regarded as a reasonably sustainable location for a limited number of dwellings.

3. This proposed allocation is one of three at Chwillog which, together, would have a capacity of some 51 dwellings at DD stage. Residents of the village have to travel to larger settlements for further education and almost all employment opportunities, retail, leisure and health care facilities. Due to the range of potential destinations it is unlikely that the bus service would provide a sufficiently attractive

service and that the private car will be the principal means of transport. For this reason, although some new housing may be appropriate to maintain village services for the benefit of all residents, it is necessary to exercise restraint on new residential development in the interests of promoting a sustainable pattern of settlement. For this reason I concur with the LPA that the combined capacity of the proposed DD allocations should be significantly reduced. I conclude that there is merit in Pre-inquiry Proposed Change NA 328 which proposes to adjust the Development Boundary at this point, reduce the area of the allocation to the rear of Madryn to 0.48ha and reduce its capacity to 12 dwellings. As I note in a later sub-section the reduction in size and capacity of this allocation is justified by the effect of development at this point on the character and appearance of the settlement.

*The effect of development on the linguistic character of Chwilog*

4. Objectors argue that the development of the proposed allocation would increase the number of non-Welsh speaking people in Chwilog and that this would weaken cultural cohesion. The LPA has, on the basis of its research into the pattern of house purchases, identified Chwilog as a settlement in a dormitory housing market area where the majority of houses are bought by people who already live in Gwynedd. It is, therefore, reasonable to assume that the potential effect of a given number of new houses on the linguistic character of the plan area as a whole is likely to be less if they were developed at Chwilog than if an equivalent number was developed elsewhere. By reason of the intrinsic nature of the settlement I conclude that the allocation of this site will minimise the adverse impact of development on Welsh culture in the plan area as a whole.

5. Objectors argue that the houses to be built on the site would not be affordable by local people. No technical justification has been submitted to support this in terms of an analysis of local disposal household income or likely house prices. Objectors advocate that the occupation of any houses built on the site should be limited to local people. PPW (paragraph 9.2.4) advises that normally market housing should not be subject to any occupancy restriction. I have not been provided with robust evidence to justify a departure from this national policy.

*The effect of development on the character and appearance of the village*

6. The proposed DD allocation is an approximately rectangular area of agricultural land located adjacent to the built-up area of the village. Only two of its sides would abut this, however. On the other two the new housing proposed at DD stage would intrude into the countryside surrounding Chwilog.

7. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. The DD allocation would not be encapsulated within the convolutions of the present built-up area but would, instead, be perceived as an intrusive and incongruous extension of the settlement which would erode its rural setting. The doubling of the size of the allocation, which is proposed by an objector, would intensify that visual harm. By its scale it would dominate the settlement which has grown incrementally over a long period. It would unacceptably change its essential character from a village which exhibits the results of lengthy organic growth to one which is overwhelmingly a modern planned settlement. This, in its own right, is sufficient reason to resist the extension of the allocation as proposed by an objector. The

reduced area proposed via NA 328 would reduce the visual intrusion to the extent that the limited number of dwellings would be perceived as a continuation of the organic growth of the village in a location adjacent to existing dwellings.

8. An objector argues that a development of 12 units on the 0.48ha site would not be viable because it could not financially support necessary sewage treatment and other infrastructure costs. Only the development of 29 units on the DD allocation of 0.97ha, or the development of 50 houses on the extended allocation of 1.98ha could, in his view, do this.

9. The housing land requirement for the UDP is calculated on a plan area-wide basis. It is then distributed to the various Dependency Catchment Areas. A requirement is not calculated on the basis of needs arising within individual settlements. If any allocation proved to be incapable of development for whatever reason, alternative capacity would have to be found within the plan area as a whole at the subsequent plan review. There would be no need to identify replacement capacity within the same settlement. The LPA intends to fully review the plan every five years and this will address such issues. As I demonstrate in the section of this report which relates to Policy CH1 there is more than sufficient housing land for the 5 year minimum period specified by PPW (paragraph 9.2.3). The objector's arguments relating to viability are not, therefore, sufficient to outweigh my conclusions in respect of the DD and proposed extended allocations on the character and appearance of the village.

*The effect of development on the safe and free flow of traffic*

10. Objectors argue that the proposed allocation could not be provided with a safe vehicular access and that the additional traffic generated would cause congestion on local roads. The plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if provision is made for a safe vehicular access and the existing road network is of sufficient standard to deal with the flow of traffic that would arise.

*The availability of necessary infrastructure*

11. Objectors argue that insufficient infrastructure is available to support the development. The plan is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to support them.

*The effect on nature conservation interests*

12. Objectors refer to the trees which are present on site boundaries and argue that these provide a habitat for birds and other forms of wildlife. Policy B20 provides that when a development is approved, planning conditions or obligations will be used to protect the nature conservation value of the site or to ensure that appropriate mitigation measures are taken.

*The effect on the living conditions of adjacent residents*

13. The occupier of an adjacent dwelling known as Gilfach Isaf is concerned that development of the proposed allocation would unacceptably reduce the private enjoyment of her dwelling. Development of the land near to her dwelling would

occur only if the DD allocation was extended in accordance with an objection. I have recommended that, rather than be extended, the DD allocation should be reduced in size.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0975) that the DD be modified by the acceptance of NA 328;**

**(REC.0976) that no other modification be made to the DD in response to these objections.**

## NEAR BRYNHYFRYD – CHWILOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/177/1	G & W Jones		566
B/652/3	Arthur Evans		566
B/138/1	Eirlys Jones		566
B/318/1	Graham Evans		566
B/319/1	Jean Evans		566
B/984/1	Mr R Roberts	CDN Planning	566
B/39/2	F Williams		566

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/3	Welsh Water		566

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/63/3	Capt. Hugh Davies		
B/65/1	Carys Davies		
B/638/3	Margaret Jones		
B/1029/4	Edward Elias		
B/275/4	Catherine Hughes		
B/273/1	Megan Griffith		
B/276/3	Sandra Thomas		
B/289/3	Ifor Williams & Eleri Wyn Williams		
B/348/1	Aled Evans		
B/274/3	Llinos Hughes		
B/269/1	Emlyn Roberts		
B/277/1	Fiona Roberts		
B/278/3	Edwin Hughes		
B/354/1	Menai Williams		
B/64/3	Helen Davies		

### Main Issues

- The effect of development on the character and appearance of the Village.
- The effect on the linguistic character of Chwillog.
- The effect on the safe and free flow of traffic.

- The availability of necessary infrastructure.

## **Inspector's Considerations and Conclusions**

### *The effect of development on the character and appearance of the Village*

1. The LPA, at DD stage, proposes that 0.67ha of land near Brynhyfryd, Chwilog, be allocated for the development of 10 dwellings. Objectors express concern that this would harm the established character of the Village. The site is located at the western edge of the settlement and abuts the existing built-up area on its east and north sides. To the west it is contained visually by the buildings of Brynhyfryd. Due to its limited size and, in particular its restricted depth, development of this site of only 10 dwellings would be perceived as incremental growth characteristic of the piecemeal evolution of the village. For these reasons I conclude that it would not cause demonstrable harm to either the essential character of the settlement or to its rural setting.

### *The effect of development on the linguistic character of Chwilog*

2. Objectors argue that the development of the proposed allocation would increase the number of non-Welsh speaking people in Chwilog and that this would weaken cultural cohesion. I deal with this in the section of this report which relates to the proposed allocation at the rear of Madryn, Chwilog.

### *The effect of development on the safe and free flow of traffic*

3. An objector argues that the lack of pavements in the western part of the village renders the site unsuitable for development. This is a factor commonly encountered in most of the smaller settlements of the plan area. If it was accepted as an in-principle barrier to residential development this would deprive many villages and even larger settlements of the development that is necessary to support essential services for their population as a whole. The effect of the lack of pavements on the safe and free flow of vehicular and pedestrian traffic must be considered on a site by site basis. The plan is to be read as a whole. Policy CH31 advises that development proposals will be approved only if the existing road network is of sufficient standard to deal with the flow of traffic that is likely to result. The plan covers the period to 2016. Read as a whole it provides an adequate framework to avoid demonstrable harm to pedestrian safety if, at the time a planning application is determined, the local road system is not of sufficient quality.

### *The availability of necessary infrastructure*

4. An objector argues that there is insufficient capacity in the sewage treatment infrastructure to support the development. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure. Another objector argues that 10 dwellings is not a sufficient number to fund the necessary additional sewage treatment capacity. I deal with this matter in the section of this report which relates to the proposed allocation at the rear of Madryn, Chwilog.

**RECOMMENDATION**

**I recommend:**

**(REC.0977) that no modification be made to the DD in response to these objections.**



**NEAR PARC YR EFAIL - EFAILNEWYDD**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA331

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/87/1	Mr & Mrs RE Roberts		561
B/928/1	Mrs M Jones	Guy D Evans	561
B/692/1	Dr Glyn Roberts		561
B/606/1	Alan Williams		561
B/592/1	Alan Williams		561
B/597/1	John Lewis Parry & Jennie Pennant Parry		561
B/595/1	Mrs Elizabeth Jones		561
B/129/1	Emlyn & Barbara Griffiths		561
B/131/1	Brian Hughes		561
B/130/1	Sion & Eirlys Hughes		561
B/591/1	Dennis & Gina Moore		561
B/594/1	Huw Parry		561
B/268/1	Louise Moakes		561
B/327/1	Keith & Carys Morris Owen		561
B/296/1	Jacqueline Adams & Michael Adams		561

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/844/2091	CPRW		561
B/928/2004	Mrs M Jones		561

**Main Issues**

- The effect of development on the promotion of a sustainable pattern of settlement.
- The effect on the character and appearance of the village.
- The effect on the best and most versatile agricultural land.
- The availability of necessary infrastructure.

## Inspector's Considerations and Conclusions

### *The effect of development on the promotion of a sustainable pattern of settlement*

1. The LPA proposes, at DD stage, that 0.18ha of land near Parc yr Efail, Efailnewydd, be allocated for the development of 5 houses. At Pre-inquiry Proposed Change stage it proposes, via NA 331, to reduce the area enclosed by the Development Boundary at this point, and the size of the allocation to 0.09ha. The capacity would remain at 5 dwellings. An objector argues that instead of 5 dwellings the site has a capacity to accommodate 9 in what he considers to be a sustainable location. He compares the DD allocation near to Parc yr Efail with the nearby site to the north east of the dwelling of Ty'n Ffordd in the same small village (which is proposed for allocation by the LPA via NA 332) and argues that the latter is not in a sustainable location. In my view the sites are comparable in terms of their access to services. If the latter is in an unsustainable location, so is the former.

2. The LPA confirms that, although it has been categorised as a Village, Efailnewydd has only a limited range of community facilities. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or other locations which are well served by public transport or can be reached by walking or cycling. Because it lacks all education provision, all but the most limited retail services and all employment, leisure and health facilities, its residents must travel to other settlements to meet almost all of their day to day needs. Because of the wide range of these that must be satisfied elsewhere it is highly unlikely that the bus service would be adequate to give access to the range of destinations at the various times people need to reach them. The Village is too remote from other settlements for walking or cycling to be a reasonable option. Most movements to and from the village are therefore likely to be by private car. This is not a place where new housing would accord with the advice of PPW. The proposed allocation would promote an unsustainable pattern of settlement.

### *The effect on the character and appearance of the village*

3. The proposed allocation would extend a finger of development even further into the open countryside surrounding the village. Objectors argue that it would harm the rural character of the settlement. The new housing development would not reinforce the existing development area by consolidating a gap between built-up areas. Instead it would introduce a prominent development into the landscape which would be clearly seen from the nearby A497. It would not be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises.

### *The effect on the best and most versatile agricultural land*

4. The LPA confirms that the proposed allocation occupies agricultural land of Grade 1 quality. Its development would not, therefore, conform to the advice of PPW (paragraph 2.8.1) that considerable weight should be given to the protection of such land from development because of its special importance. Such land should be developed only if there is an overriding need for the development and either previously developed land or land in a lower agricultural grade is not available.

5. Housing need is calculated on a UDP-wide basis and then assigned to Dependency Catchment Areas. No housing need figures are calculated for individual settlements, least of all small villages. There is no basis on which I can conclude that a particular number of new houses is needed at Efailnewydd. There is, therefore, no overriding need for the development of Grade 1 agricultural land. I consider that the weight to be given to the protection of best and most versatile agricultural land is, in its own right, sufficient justification for the deletion of the whole of the proposed allocation.

*The availability of necessary infrastructure*

6. Objectors argue that the local sewerage system is inadequate to support additional development. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to support them.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0978) that the DD be modified by the deletion of the whole of the proposed allocation of housing land near to Parc yr Efail and the exclusion of the whole of that area from the Development Boundary of Efailnewydd and, in particular, that NA 331 be not accepted;**

**(REC.0979) that no other modification be made to the DD in response to these objections.**

## NEAR TY'N FFORDD - EFAILNEWYDD

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA332

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1046/1	Ieuan G Williams		561

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/547/1	Mr Williams & Mrs Einir Hughes		561

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/928/2005	Mrs M Jones		561
B/756/2157	Environment Watch Wales & the Borders		110

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/969/2032	Welsh Water		

### Main Issues

- The effect of the allocation on the promotion of a sustainable pattern of settlement.
- The effect of development on the character and appearance of the Village.
- The effect on the best and most versatile agricultural land.
- The merits of the land to the west of Ty'n Ffordd.

### Inspector's Considerations and Conclusions

*The effect of the allocation on the promotion of a sustainable pattern of settlement*

1. At Pre-inquiry Proposed Change stage the LPA, via NA 332, proposes to extend the Development Boundary to include 0.21ha of land to the north east of the dwelling known as Ty'n Ffordd, Efailnewydd, and allocate it for the development of 5 dwellings as a replacement for the land at Parc yr Efail which it has proposed to delete via NA 331. An objector argues that the land to the north

east of Ty'n Ffordd is not in a sustainable location. For the reasons I give in the section of this report which relates to the proposed allocation at Parc yr Efail I agree with this assessment.

*The effect of development on the character and appearance of the village*

2. PPW (paragraph 9.3.1) advises that new housing developments should be well integrated with and connected to the existing pattern of settlement. The LPA argues that the land to the north east of the dwelling of Ty'n Ffordd, is bounded on three sides by existing development and, therefore, does not extend the settlement into the countryside. The development to the south-west and north of this site is limited to only single isolated dwellings which are sporadic developments in the countryside, clearly beyond the consolidated built-up area of the Village. The proposed allocation would not, therefore, reinforce the settlement but, instead, promote a fragmented pattern of development contrary to PPW advice.

*The effect on the best and most versatile agricultural land*

3. The LPA confirms that this site is of Grade 1 agricultural quality. I deal with this matter in the section of this report which relates to the proposed allocation at Parc yr Efail.

*The merits of the land to the west of Ty'n Ffordd*

4. An objector argues that a field to the west of the dwelling of Ty'n Ffordd should be included within the Development Boundary of Efailnewydd in order that it may be developed for housing. This would, it is said, replace the dwelling capacity lost to the village if NA 331 was implemented. At the inquiry the LPA confirmed that, even if the area of the proposed housing allocation at Parc yr Efail was reduced, the capacity would remain at 5 dwellings. In any case, for the reasons I give in relation to that particular proposed allocation, the loss of dwellings on allocated sites need not justify a replacement in the same small settlement.

5. The objector argues that development on the land west of Ty'n Ffordd would form a natural extension to the village. It does, however, abut open countryside on its north and south sides and only sporadic residential development in the open countryside on its west and east sides. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW. The land is of Grade 1 agricultural value. I deal with this matter in the section of this report which relates to the proposed allocation at Parc yr Efail. For all these reasons I conclude that land to the west of the dwelling known as Ty'n Ffordd in the Village of Efailnewydd should not be included within the Development Boundary.

## **RECOMMENDATION**

**I recommend:**

**(REC.0980) that no modification be made to the DD in response to these objections and, in particular, that NA 332 be not accepted.**

**OFF LON ISAF – MORFA NEFYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
B/205/1	Jennette C Griffith		
B/206/1	Ann Eifiona Jones		
B/210/1	John Daniel Jones		
B/207/1	Mair E Williams		
B/204/1	Bryn Roberts		
B/209/1	Emyr Williams		
B/171/1	Evan Darvel Owens		
B/167/1	Gareth Thomas Owens		
B/178/1	Arthur H Jones		
B/188/1	Robert Jones		
B/211/1	Bethan Emlyn Owens		
B/173/1	Helen Mary Owens		
B/163/1	Gareth Gough Williams		
B/164/1	Glenys Pilkington		
B/203/1	Robert Percy Midwood		
B/175/1	Bryn Griffith		
B/176/1	Griffith R Owens		
B/184/1	William Owen Hughes		
B/189/1	Robert John Williams		
B/168/1	Kim Williams		
B/170/1	Robert Wyn Thomas		
B/172/1	Owen Richard Owens		
B/165/1	Selwyn Scott		
B/179/1	Bethan Williams		
B/180/1	Lena Williams		
B/161/1	Ronald & Lorna Floyd		
B/210/1	John I for Jones		
B/182/1	T Stephen Clarke		
B/186/1	Elizabeth Ann Hughes		
B/187/1	Mary Sennar Lewis		
B/190/1	Eira Williams		

**FORMER HOCKEY FIELD - PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/69/1	Delyth & Gareth Griffith		95
B/43/1	Miss Marel Roberts		95
B/935/5	Mr & Mrs A Davies		95
B/1222/1	Mr R Roberts		95
B/68/3	David J Griffiths		95
B/242/5	Pwllheli Town Council		95
B/885/1	Hywel Williams		95
B/321/1	Derek Soane		95
B/258/1	Rhoda & William Page Williams		95
B/45/1	Mr & Mrs Gerallt Jones		95
B/44/1	Mr & Mrs Douthwaite		95
B/259/1	Huw Roberts		95
B/265/3	ER & J Lloyd		95
B/292/3	Myfanwy Jones	Dewi Gough Jones	95
B/731/1	Iwan Edgar		95
B/344/1	Tony Elliott		95
B/829/4	Mr Evan Hughes		95
B/630/1	Peter & Muriel O'Brien		95
B/19/3	Laura Roberts		95
A/105/1	Alun Jones		95
B/66/1	David Owen		95
B/202/1	Dafydd Davies		95
B/67/1	W Jones		95
B/70/3	Evan Wyn & Lydia M Jones		95
B/71/1	Griffith Jones Harris		95

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/6	Welsh Water		95

## Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/256/1	Head – Coleg Meirion Dwyfor		

### Notes

- Objection B/71/1 is made by the personal representative of the late Mr G J Harris.
- Objections B/935/3 and B/630/3 are dealt with in this section in addition to the above.

### Main Issues

- The constraints to development at Pwllheli.
- The prospects for achieving a sustainable pattern of settlement.
- The effect on the safe and free flow of traffic.
- The effect on the rural setting of Pwllheli.
- The availability of necessary infrastructure.
- The effect on nature conservation interests.
- The merits of alternative sites.

### Inspector's Considerations and Conclusions

#### *The constraints to development at Pwllheli*

1. The LPA proposes, at DD stage, that 0.48ha of land at the Former Hockey Field, Pwllheli, be allocated for the development of 10 dwellings. The LPA has demonstrated that, due to physical factors, there is very limited scope for the identification of sites for new housing in this town. A substantial proportion of this Urban Centre is within a C2 flood risk zone. TAN15 notes that these are the areas at greatest risk of flooding. That document advises that all residential development should be regarded as in the highly vulnerable category. The flooding consequences associated with such development are not considered to be acceptable in C2 areas and plan allocations should not be made for it there.

2. Most of the remainder of the town, including most of the centre of Pwllheli, is within the C1 or B zones. In C1 areas plan allocations for highly vulnerable development can proceed only subject to justification and acceptance of the consequences. In zone B, sites are generally suitable for most forms of development. The assessments required are not likely to identify consequences that cannot be overcome or managed to an acceptable level.

3. TAN15 (paragraph 6.1) recognises that, in some cases, the curtailment of development in order to avoid flood risk can have negative economic and social consequences. For that reason a balanced judgment is required. Pwllheli is a long-established settlement which contains an accumulation of past investment in shops, schools, housing, employment, health, communications and social facilities. A certain level of new residential development is necessary in order to sustain these assets and avoid the environmental costs if they were to become less viable and, over the long term, had to be replaced piecemeal elsewhere.



4. Due to the extent of the C2 flood risk zone at Pwllheli, and the difficulty of identifying suitable development sites within the C1 and B zones of an already densely built-up area, this is clearly a settlement where judgment which balances a variety of interests, must be made. In order to secure the scope for the new housing that will support existing and proposed retail, educational, leisure and health facilities, and to do so in locations which minimise the number and length of trips by private car, it will be necessary in this particular settlement to accept harm to specific interests of acknowledged importance to a degree that would not be appropriate in other settlements.

*The prospects for achieving a sustainable pattern of settlement*

5. The Former Hockey Field is located within only 400m of the principal shopping street of Pwllheli and within a short walking distance of all the other services and public transport facilities in the town centre. These latter include a wide range of bus services and a railway station. It must be regarded as being in a sustainable location. The highway linking the site to the town centre is narrow, steeply graded and lacks a footpath. The latter is a factor common to many settlements of all sizes in the plan area. If it was to be regarded as an in-principle obstacle to development it would not be possible to identify an adequate housing land resource in the plan area as a whole. The gradient would certainly inhibit walking trips to and from the town centre by those who were expecting to carry heavy loads of shopping and those who were elderly or infirm. This road is not on a bus route. For these reasons the development of the site would stimulate a greater use of the private car than a site at the same distance but at the same level as the town centre. However, the length of such car trips would be very much less than if, in response to identified constraints, the housing allocation was diverted to smaller settlements, including the Villages in the same Dependency Catchment Area. I conclude that the proposed allocation is in as sustainable a location as can be identified in the particular circumstances of Pwllheli.

*The effect on the safe and free flow of traffic*

6. Objectors refer to the gradient, limited width and twisting alignment of the road linking the site to the town centre and to the lack of pavements along it. This highway gives access to a sixth form college situated very near to the proposed allocation. At certain times of day this generates a heavy flow of traffic. Traffic calming measures have, however, been installed. The plan must, in any case, be read as a whole. Policy CH31 provides that development proposals will be approved only if the existing road network is of a sufficient standard to deal with the flow of traffic that is likely to result. The plan makes provision for development for the period up to 2016. It provides the framework by which planning permission will be refused for a particular scheme if, at the time this is sought, the condition of the local highway network is incapable of safely accommodating the expected levels of vehicular and pedestrian traffic.

*The effect on the rural setting of Pwllheli*

7. Although the proposed allocation is only a short distance from the centre of Pwllheli a narrow belt of elevated ground separates the site from most of the built-up area of the town. The site is, therefore, not perceived as within the town in visual terms but, instead, at the edge of a wide expanse of open countryside which

forms the rural setting to Pwllheli. Development on this site would effect an intrusion of urban uses into the rural landscape. It would, to some extent, erode the rural setting of the town. Development would lead to a fragmented pattern of settlement, contrary to the advice of PPW (paragraph 9.3.1).

8. The degree of incongruity is, however, reduced somewhat by the presence of the substantial buildings of the sixth form college nearby and also several groups of dwellings along both sides of the road which give the immediate locality a semi-rural character. In my view the degree of harm to the rural setting of Pwllheli is of a degree that would not be acceptable adjacent to other settlements, but is justified in this particular case by the need to promote a sustainable pattern of settlement in a situation where the choice of sites is severely constrained by the risk of flooding.

*The availability of necessary infrastructure*

9. Objectors argue that the necessary infrastructure is not available to support development of this proposed allocation. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure to support them. The plan is for the period up to 2016. If, during this period, a planning application was submitted at a time when necessary infrastructure was not available and could not be provided, planning permission would be refused and the harm to interests of acknowledged importance that would otherwise arise would be avoided.

*The effect on nature conservation interests*

10. Objectors argue that development of this land would have an adverse impact on local wildlife. The plan is to be read as a whole. Policy B20 provides that when a development is approved, planning conditions and/or obligations will be used to protect the nature conservation value of the site or ensure that appropriate mitigation measures are provided.

*Constraints to development*

11. An objector argues that a covenant requires that the site be returned to agriculture when its present use ceases. The owner of the land supports the proposed allocation, however. If such a constraint does, indeed, exist and cannot be overcome then an alternative site will have to be found. The expressed intention of the LPA to comprehensively review the plan at 5 year intervals provides sufficient opportunity for this to be done within the remaining period to 2016.

*The merits of alternative sites*

12. Objectors suggest alternative sites to the proposed allocation. Several of these are within the C2 flood risk zone where land should not be allocated for housing in any circumstances. Others are in flood zone B where residential development could be envisaged, but are required to be retained in their existing use or are in the process of redevelopment for non-housing uses. Two other sites identified are already proposed for housing allocation at either DD stage or at Pre-inquiry Proposed Change stage. The remaining sites are in locations where their potential is already taken into account in the assumptions made in respect of the likely level of residential development arising on small or windfall sites. I conclude

that the need for the proposed housing allocation at the Former Hockey Field is not reduced by the development potential of these other sites.

**RECOMMENDATION**

**I recommend:**

**(REC.0981) that no modification be made to the DD in response to these objections.**

## NEAR GLANDON GARAGE - PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA336

This Section is subject to Further Proposed Changes Nos: NAP29

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/829/6	Mr Evan Hughes		94

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2094	CPRW		95
B/242/2007	Pwllheli Town Council		94

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2033	Welsh Water		94

### Main Issues

- The effect of development on the rural setting of Pwllheli.
- The effect of development on the promotion of a sustainable pattern of settlement.

### Inspector's Considerations and Conclusions

#### *The effect of development on the rural setting of Pwllheli*

1. Pre-inquiry Proposed Change NA 336 proposes that the Development Boundary of Pwllheli should be extended to enclose an area to the east of the Glandon Garage on the north side of the A499 road. This is proposed by that same Pre-inquiry Proposed Change to be allocated for housing and for employment development. NA 336 does not identify the specific area which would be developed for each of these purposes. At the relevant inquiry session the LPA was not able to clarify this. It did, however, confirm that the total area of the land was not 3.0ha as had been previously stated but was 2.79ha in extent. The employment uses were proposed to occupy 2.0ha of this, leaving the 0.79ha to accommodate 30 dwellings. Via Further Proposed Change NAP 29 the LPA proposes that the employment designation be limited to B1 use only in order that this will be compatible with the proposed adjacent housing.

2. The A499 road approaches Pwllheli from the north through an open rural landscape. Even as it nears the threshold of the town the presence of the built-up area is hidden from the road by high ground. For the final 1km of the approach the road follows a narrow valley between tall hills covered with bracken, rough grassland and occasionally trees. Only on rounding the final bend is the outer edge of the town revealed at a point where the prominent Glandon Garage is seen immediately in front of a densely developed residential area.

3. Objectors argue that the undeveloped nature of this approach to the town is an important aspect of its character and rural setting which should be retained. I agree with this general principle but note that development on the area identified by NA 336 would be apparent only when the final bend in the approach road is passed and the outskirts of the town are already in view. The visual impact of the town extends to a point which approximates to the eastern edge of the area identified by that Pre-inquiry Proposed Change. The immediate presence of the town is already indicated once the final bend is passed by the view, straight ahead, of the buildings of the Glandon Garage.

4. The impact of development on the landscape itself would be reduced by the local land form because the area of the proposed allocations slopes downwards from the road. This provides significant potential for landscaping (under Policy B26) and the control of building design (under Policy B21) to very materially reduce the visual impact of the development. The restriction of the employment development to B1 uses, as proposed by NAP 29, would make it easier for the control of building design to minimise visual impact as well as ensuring appropriate living conditions for future residents of the envisaged housing. I regard this as a beneficial proposal but recognise that it must be the subject of public consultation at modification stage. The area proposed for allocation is within a proposed Landscape Conservation Area but this non-statutory designation does not preclude development. For all these reasons I conclude that the extension of the Development Boundary and the allocation of the land within this for housing and employment development as proposed by NA 336 will not give rise to unacceptable harm to the rural setting of Pwllheli.

5. An objector refers to the report of the Inspector into the public local inquiry for the Dwyfor Local Plan (1997) in which he concluded that the Council should resist pressure to develop this sensitive green wedge or other sections of this attractive valley landscape. The particular area of land referred to is, however, in a much more prominent position to the north of the objection site and would have a greater visual impact.

*The effect of development on the promotion of a sustainable pattern of settlement*

6. Pwllheli has been classified by the LPA as an Urban Centre. It contains within it a wide range of retail, leisure, employment, educational and health care facilities. It is a local hub for a wide range of public transport services including a link to the national rail network. It must be regarded as a highly sustainable location for development. The site is green-field land but there is a pronounced shortage of suitable previously developed land within Pwllheli. As PPW (paragraph 9.2.8) advises, settlement extensions are the next most sustainable options in such circumstances.

7. The land near to Glandon Garage is only some 500m from the principal shopping street of the town. It is also within easy walking distance of all its other facilities and services and of its principal residential areas. Its development would minimise the use of the private car both by new residents and potential employees. Because of the constraints to development in the town, the alternative to development there would be to divert housing and employment demand to settlements that rank lower in hierarchy. In that circumstance an unacceptably high proportion of trips would be by private car.

8. As I note in the section of this report which relates to the Former Hockey Field at Pwllheli, the development opportunities of the town are tightly constrained by physical factors. High land rises immediately to the north of the built-up area, confining land of developed character to a narrow coastal strip. Much of the present urban area is exposed to flood risk of various degrees. These factors severely restrict the opportunities to identify land for development. Objectors propose alternative sites to that near the Glandon Garage for both housing and employment development. My conclusions in respect of alternative housing sites, in the section of this report which relates to the land at the Former Hockey Field, Pwllheli, also apply in this case. An objector emphasises, in particular, the role of an area of land on The Former Island site which projects into the harbour of Pwllheli as providing a potential alternative site for housing and employment uses to that near the Glandon Garage.

9. Most of that land is in a C2 flood risk area. It is therefore unsuitable in principle for housing development. Some small parts are outside all the categories of flood risk and could be developed for housing. Employment, as a less vulnerable category for development identified by TAN15 could, in theory, be developed on this C2 land so long as this was justified in a particular case and could also be developed on the small area above flood level.

10. The Pwllheli Harbour Act 1983 (amended 1993) does, however, prohibit housing and employment development on a defined part of The Former Island site. It also prohibits any use other than the provision of open space, car parking or vehicular and pedestrian access on the remainder. The land referred to in this Act cannot, therefore, be used as an alternative to that near to the Glandon Garage. The objector refers to an area to the south of that defined in the Act and argues that this could be designated for employment use.

11. The harbour area as a whole, including this latter area, is an extremely attractive location that offers good views of the town and its wider upland setting. It is a rare resource and has the potential to attract high status recreation and tourism facilities based on leisure activities, particularly sailing, and so diversify the economy of the town for the wider benefit of its people. This potential is recognised in the Development Brief which has been prepared for The Former Island site, by the LPA. Because of the potential of this area to promote a sustainable enhancement of the economic and environmental prospects of Pwllheli I agree with the LPA that any potentially developable sites should not be devoted simply to housing or employment (B1) uses but that they should be reserved for a scheme of development which will exploit their unique locational assets.

12. An objector expresses concern that the sewerage infrastructure may be inadequate to support the development of the land referred to by NA 336. The plan

must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure.

13. For all these reasons I conclude that the development of the land near to Glandon Garage for housing and employment purposes would promote a sustainable pattern of settlement without causing unacceptable harm to the rural setting of Pwllheli.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0982) that the DD be modified by the extension of the Development Boundary in accordance with NA 336 and the identification within this of an area of 0.79ha to be allocated for housing and 2.0ha to be allocated for B1 employment;**

**(REC.0983) that no other modification be made to the DD in response to these objections.**

## ABERERCH ROAD – PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA337

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/935/6	Mr & Mrs A Davies		103
B/350/1	Mrs E Williams		103
B/310/1	Owen Roberts		103
B/760/50	CCW		103
B/844/43	CPRW		103
B/249/1	Gwilym R Davies		103
B/1223/1	Dr R Williams MA, MBBCH		94
B/749/6	Mr & Mrs H Fisher- Jones		103
B/151/1	Vera Davies		103
B/792/1	Mr & Mrs Michael Parry		103
B/590/1	H Roberts		103
B/728/1	William Roberts		103
B/792/3	Mr & Mrs Michael Parry		103

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/8	Welsh Water		103
B/776/1	Environment Agency Wales		103

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/829/1	Mr Evan Hughes		
B/242/4	Cyngor Tref Pwllheli		

### Note

- Objection B/1223/1 is responded to in LPA proof 103.



## Main Issues

- The effect of development on the prospect of achieving a sustainable pattern of settlement.
- The effect of development on the rural setting of Pwllheli.
- The effect on the safe and free flow of traffic.
- The effect on nature conservation interests.

## Inspector's Considerations and Conclusions

### *The effect of development on the prospect for achieving a sustainable pattern of settlement*

1. The LPA proposes, at DD stage, that 1.58ha of land at Abererch Road, Pwllheli, should be allocated for the development of 39 dwellings. In response to an objection which draws attention to the degree of flood risk to which part of the allocation would be exposed, the LPA at Pre-inquiry Proposed Change stage proposes, via NA 337, to reduce the size of the allocation to 1.12ha with a capacity of 30 dwellings. The area proposed to be retained as an allocation would not lie within the C1 and C2 flood risk zones referred to in TAN15.

2. The proposed allocation is situated at the extreme eastern end of Pwllheli but only some 1.2km from the wide range of retail, entertainment, employment and health care facilities of the town centre. It is much closer, only 800 to 900m, to the large employment area of the Glan y Don Industrial Estate. These destinations are, therefore, accessible by walking or cycling as well as by a bus service. For these reasons this proposed allocation should be regarded as being within a sustainable location.

### *The effect of development on the rural setting of Pwllheli*

3. PPW (paragraph 9.3.1) advises that new housing developments should be well integrated with and connected to the existing pattern of settlement. The expansion of towns should avoid creating ribbon development or a fragmented pattern of settlement. The site would be at the extreme eastern end of a ribbon of intermittent residential development some 700m long and only one dwelling deep which follows the north side of the A497 road and which separates it from the consolidated built-up area of the town.

4. Immediately to the rear of this intermittent ribbon of development is a steep wooded ridge which extends for the whole of its length. This dominates the scene and penetrates, at points, to the north side of the A497 road itself. As a consequence the houses which form the ribbon are not prominent features in the landscape. For the whole of its length this ribbon has the character of only a sporadic development in the open countryside rather than of an integral part of the town. This impression is reinforced by the extensive area of open marshland which lies opposite it on the south side of the road.

5. Development of the proposed allocation would, therefore, have the effect of reinforcing a barely tangible ribbon of development contrary to PPW advice. The site itself is a grassed field with open countryside or coastal marshland on all sides, except its south west corner. Development would not be visually well integrated with or connected to the existing pattern of settlement. It would, instead, be

perceived as an isolated development in the open countryside. It would most distinctly create a fragmented pattern of settlement. These fundamental matters of the relationship of the site to the main settlement could not be mitigated by detailed attention paid to landscaping. In my view this harm to the rural setting of Pwllheli would be so pronounced as to outweigh the benefits in sustainability terms which I have identified.

*The effect on the safe and free flow of traffic*

6. An objector argues that a safe vehicular access could not be provided for the site. The plan must be read as a whole. Policy CH31 provides that development proposals will be approved only if such access can be provided.

*The effect of development on nature conservation interests*

7. An objector argues that the development of the site would have an unacceptable impact on flora and fauna. The plan must be read as a whole. Policy B20 provides that when a development is approved, planning conditions and/or obligations will be used to protect the nature conservation value of the site or ensure that appropriate mitigation measures will be provided. Should an assessment reveal that land within the proposed allocation merits designation as a wild-life site, any planning application would be considered against the criteria of Policy B16. If any part of the site was designated as an SSSI during the plan period then this would be taken into account at the planning application stage.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.0984) that the DD be modified by the deletion of the proposed housing allocation on land at Abererch Road, Pwllheli;**

**(REC.0985) that no other modification be made to the DD in response to these objections and, in particular that NA 337 be not accepted.**

**DEINIO FIELD - PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/68/1	David J Griffiths		95
B/749/3	Mr & Mrs H Fisher-Jones		95
B/67/3	W Jones		95
A/100/1	No Name		167
B/885/3	Hywel Williams		95
B/69/3	Delyth & Gareth Griffith		95
B/44/2	Mr & Mrs Douthwaite		95
B/259/3	Huw Roberts		95
B/935/5	Mr & Mrs A Davies		95
B/344/3	Tony Elliott		95
B/321/3	Derek Soane		95
B/1222/3	Mr R Roberts		95
B/45/3	Mr & Mrs Gerallt Jones		95
B/242/6	Pwllheli Town Council		95
B/258/3	Rhoda & William Page Williams		95
B/292/1	Myfanwy Jones	Dewi Gough Jones	95
B/265/1	E.R. & J Lloyd		95
B/71/3	Griffith Jones Harris		95
B/242/1	Pwllheli Town Council		95
B/43/2	Miss Marel Roberts		95
B/829/5	Mr Evan Hughes		95
B/66/3	David Owen		95
B/19/1	Laura Roberts		95
A/105/3	Alun Jones		95
B/731/3	Iwan Edgar		95
B/70/1	Evan Wyn & Lydia M Jones		95

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/969/7	Welsh Water		95

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/304/3	Esyllt Rhys Jones		

### Note

- Objection B/711/3 is made by the personal representative of the late Mr G J Harris.

### Main Issues

- The constraints to development at Pwllheli.
- The prospects for achieving a sustainable pattern of settlement.
- The effect on the safe and free flow of traffic.
- The effect on the rural setting of Pwllheli.
- The availability of necessary infrastructure.
- The effect on nature conservation interests.
- The effect on residential amenity.
- The merits of alternative sites.

### Inspector's Considerations and Conclusions

#### *The constraints to development at Pwllheli*

1. The LPA, at DD stage, proposes that 0.52ha of land at Deinio Field, Pwllheli, should be allocated for the development of 12 dwellings. In respect of constraints to development at Pwllheli this proposed allocation is subject to the same considerations that I identified in the section of this report which relates to the proposed allocation at the Former Hockey Field.

#### *The prospects for achieving a sustainable pattern of settlement*

2. The land at Deinio Field is located within only 500m of the principal shopping street of Pwllheli and within a short walking distance of all the other services and public transport facilities of the town centre. It must be regarded as within a sustainable location. The proposed allocation is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli.

#### *The effect on the safe and free flow of traffic*

3. The proposed allocation at Deinio Field is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli.

*The effect on the rural setting of Pwllheli*

4. This proposed allocation is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli, with the exception that this site occupies a slightly more prominent position within the rural landscape. As in the case of the Former Hockey Field, the degree of harm to the rural character of its surroundings would not be acceptable adjacent to other settlements, but is justified in this particular case by the need to promote a sustainable pattern of settlement in a situation where the choice of sites is severely constrained by the risk of flooding.

*The availability of necessary infrastructure*

5. The proposed allocation at Deinio Field is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli.

*The effect on nature conservation interests*

6. The proposed allocation at Deinio Field is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli.

*The effect on residential amenity*

7. Objectors argue that the development of housing on this site would impair the private enjoyment of adjacent dwellings. The plan is to be read as a whole. Policy B22 provides that proposals which would have an unacceptable impact on the amenities of local communities will be refused.

*The merits of alternative sites*

8. The proposed allocation at Deinio Field is subject to the same considerations that I identify in the section of this report which relates to the proposed allocation at the Former Hockey Field, Pwllheli.

**RECOMMENDATION**

**I recommend:**

**(REC.0986) that no modification be made to the DD in response to these objections.**

## HOSPITAL SITE - PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/749/4	Mr & Mrs H Fisher-Jones		93
B/242/3	Pwllheli Town Council		93

### Main Issues

- The potential contribution of the site to the provision of affordable housing.
- The effect of development on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

#### *The potential contribution of the site to the provision of affordable housing*

1. The LPA, at DD stage, proposes that this 0.61ha site be allocated for the development of 5 dwellings. An objector argues that it should accommodate some affordable units. The LPA agrees and, via NA 233, proposes that 40% of the dwellings (some 2 units) should be of this type. I conclude that this satisfies the concerns of the objector. I deal with the full range of arguments relating to the policy for Affordable Housing in the section of this report which is specifically addressed to that topic.

#### *The effect of development on the safe and free flow of traffic*

2. An objector argues that the characteristics of the site access and the number of vehicle movements generated by the new houses would cause traffic problems. The Local Highway Authority has confirmed that the proposed access is satisfactory. I noted, furthermore, on my site inspection, that the use of the land as a hospital generates a considerably greater number of vehicle movements than would a housing development. The number of such movements would, in any case, be reduced significantly by the town centre location of the site because this would result in a very high proportion of trips being made on foot. For these reasons I conclude that the site could be redeveloped without demonstrable harm to the safe and free flow of traffic.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0987) that the DD be modified by the acceptance of NA 233 insofar as it relates to this site;**

**(REC.0988) that no other modification be made to the DD in response to these objections.**

## LAND ADJACENT TO BRO GWYSTL, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA343

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/320/1	Alun & Margaret Williams		565

### Objections to Pre-inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/2032	Lord Newborough	Guy D Evans	565

### Note

- This site is referred to in Appendix 3 of the DD as land 'Near the Industrial Estate', Y Ffor.

### Main Issues

- The effect of development on the rural setting of Y Ffor.
- The availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

#### *The effect of development on the rural setting of Y Ffor*

1. The LPA proposes, via Pre-inquiry Proposed Change NA 343, in response to an objection made at DD stage, to extend the Development Boundary of the Village of Y Ffor to include 0.32ha of land adjacent to Bro Gwystl and allocate this for the development of 8 dwellings. PPW (paragraph 9.3.1) advises that new housing developments should be well integrated with and connected to the existing pattern of settlement. The proposed allocation would be bounded by an established industrial estate to its east and residential areas to the north and west. It would be perceived as a consolidation of the built-up area of the Village. Development upon it would not erode the rural setting of Y Ffor. The settlement contains a primary school, post office/shop, a garage and places of employment. Although it is only a small settlement it can provide a reasonably sustainable location for a very limited number of new dwellings which can help retain existing facilities for the benefit of all residents.



*The availability of necessary infrastructure*

2. An objector argues that insufficient sewage treatment capacity is available to support additional residential development at Y Ffor. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of the necessary infrastructure. A further objector contends that there is no obvious way that the site could be provided with a vehicular access. The means of access is a matter to be determined at planning application stage. Policy CH31 provides that proposals will be approved only if vehicular access can be secured that is both safe and in keeping with the surroundings of the site. This will ensure, among other things, that noise and disturbance generated by traffic will not be introduced unacceptably close to any of the existing dwellings which abut the site.

**RECOMMENDATIONS**

**I recommend:**

**(REC.0989) that the DD be modified by the acceptance of NA 343;**

**(REC.0990) that no other modification be made to the DD in response to these objections.**

## BWLCH Y FFORDD ISAF FIELDS, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA341

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/881/1	Gwynfor & Sian Edwards		565

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/2031	Lord Newborough	Guy D Evans	565
B/844/2095	CPRW		565
B/756/2160	Environment Watch Wales & the Borders		110

### Conditionally Withdrawn Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/2034	Welsh Water		565

### Note

- This site is referred to in Appendix 3 of the DD as land 'Near Hafod Lon, Y Ffor'.

### Main Issues

- The effect of development on the prospects for achieving a sustainable pattern of settlement.
- The effect of development on the setting of Y Ffor.
- The availability of necessary infrastructure.

### Inspector's Considerations and Conclusions

*The effect of development on the prospects for achieving a sustainable pattern of settlement*

1. The LPA proposes, via Pre-inquiry Proposed Change NA 341, in response to an objection made at DD stage, to extend the Development Boundary of the Village of Y Ffor, to include 1.46ha of land at Bwlch Y Ffordd Isaf Fields and allocate this for the development of 22 dwellings. The settlement contains a primary school, post office/shop, a garage and places of employment in a small industrial estate.

2. Although it is only a small settlement it can provide a reasonably sustainable location for a very limited number of new dwellings which can help to retain existing facilities for the benefit of all residents. In my view, however, because of the very limited range of services available at Y Ffor, any residential development in excess of this would stimulate an unacceptable volume of trips to the larger centres. Because of the limited range of services available at Y Ffor the variety of destinations to which access outside the Village would be required is very great. It is unlikely that public transport would provide sufficient variety in respect of destinations and timing to meet this effectively. Resort would then be had to the private car, particularly when a trip is intended to serve multiple purposes. In my view a development of 22 dwellings would be too large for the limited facilities available in this small Village. It would contribute, unacceptably, to an unsustainable pattern of settlement.

*The effect of development on the rural setting of Y Ffor*

3. PPW (paragraph 9.3.1) advises that new housing development should be well integrated with and connected to the existing pattern of settlement. The proposed allocation lies at the northern edge of the village. Although it would abut the consolidated built-up area, and in that sense could be said to be connected to it, it cannot be regarded as being integrated with its structure. It would simply be a residential development extending the settlement into the open countryside. It would be perceived as an arbitrary addition of new units along the western side of the main road at this point which would neither consolidate nor reinforce the existing pattern of settlement. For these reasons I conclude that it would unacceptably erode the rural setting of Y Ffor.

*The availability of necessary infrastructure*

4. An objector argues that there is insufficient sewage treatment capacity available to support additional residential development at Y Ffor. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of the necessary infrastructure.

## **RECOMMENDATION**

**I recommend:**

**(REC.0991) that no modification be made to the DD in response to these objections and, in particular, that Pre-inquiry Proposed Change NA 341 be not accepted.**

**OMISSION OF HOUSING LAND ALLOCATIONS: LLYN DCA**

## LAND AT BRYN EGLWYS, ABERDARON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/997/6	D Harden	Guy D Evans	560

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that land to the east of Bryn Eglwys should be included within the Development Boundary of the Village of Aberdaron and be allocated for housing development because it would provide a logical extension of the settlement and be well integrated with its built form. He considers that the village contains sufficient services to support an allocation for up to 15 market houses.

2. The site lies to the east of the consolidated built-up area of the village and is entirely surrounded by open countryside. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1). It is, furthermore, within a TAN15 C1 flood risk zone. TAN15 advises that housing is a highly vulnerable category of development. Development plans should allocate land for this purpose in such areas only if this is justified.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. There is, therefore, no justification for an additional allocation, particularly in a flood risk zone. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the harmful effect of development on the pattern of settlement, I conclude that this land should not be allocated for housing development.

4. As part of the same objection the objector argues that land opposite the surgery at Aberdaron should also be included within the Development Boundary and allocated for housing development. The above arguments which relate to the need for housing land and the promotion of a sustainable pattern of settlement apply to this site and justify its non-allocation and exclusion from the Development Boundary.

**RECOMMENDATION**

**I recommend:**

**(REC.0992) that no modification be made to the DD in response to this objection.**

## LAND ON ST GARMON FIELD, ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/950/1	Richard & Kathleen Bufton	Eversheds LLP	181

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Abersoch and be allocated for housing development. They contend that the settlement contains sufficient services and facilities to support additional dwellings and, express their view that its land form would render these inconspicuous in the landscape. They believe that a safe vehicular access can be provided.

2. The site is located beyond the consolidated built-up area of the village and abuts open countryside on its northern and western sides. It is steeply sloping and development upon it would be clearly visible from the rising land to the north of the stream which forms its northern boundary. It would be perceived as an area of new development projecting into the open countryside. It would not, therefore, be well integrated with the existing pattern of settlement as PPW (paragraph 9.3.1) advises.

3. The site has an area of some 1.13ha and, at a density of between 25 and 30dph, could accommodate between 28 and 34 dwellings. TAN18 (paragraph B4) advises that for less busy, simple and very minor junctions and busy private accesses a minor road distance of 4.5m will normally be the minimum acceptable. Having regard to the known speeds of traffic along the highway at this point the appropriate major road distance for the necessary access is 90m. Because of the presence of a belt of dense tall bushes and low trees within the curtilage of an adjacent site which is not under the control of the objectors, the major road visibility to the right available to an emerging vehicle is only some 10m from a minor road distance of 4.5m. This falls so far short of the necessary minimum that it is clear that development of this land cannot proceed without unacceptable harm to the safe and free flow of traffic.

4. The objectors argue that the capacity of the site could be reduced to a level which would allow a minor road distance of 2.4m to be adopted. This would enable visibility over the full 90m major road distance. In accordance with the advice of

TAN18 such a minor road distance is appropriate for a development of up to only 6 dwellings. A development of that scale would lead to an inefficient use of land, contrary to the advice of PPW (paragraph 9.1.2).

5. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of the proposal on the character of the settlement and the safe and free flow of traffic, I conclude that this land should not be allocated for housing development.

## **RECOMMENDATION**

**I recommend:**

**(REC.0993) that no modification be made to the DD in response to this objection.**



## LAND OPPOSITE PONT Y GOF PRIMARY SCHOOL, BOTWNNOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/997/5	D Harden	Guy D Evans	519

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Botwnnog and be allocated for housing development because the settlement has the form of a ribbon of development and the allocation of this land would perpetuate this, thus reinforcing its character. He considers that the village has sufficient facilities that it should be regarded as a sustainable location for further development.

2. The proposed housing allocation would abut the open countryside on three sides and unacceptably erode the rural setting of the village, contrary to the advice of PPW (paragraph 9.3.1) that new housing should be well integrated with and connected to the existing pattern of settlement.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development on the pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0994) that no modification be made to the DD in response to this objection.**

## CAE CEFN CAPEL, RHYDGOCH, BOTWNNOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/537/1	Kenneth H & Gwyneth Evans		97

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that this land should be included within the Development Boundary of the Village of Botwnnog and be allocated for housing development in order to meet a local need for this. They argue that the village contains a sufficient range of services and facilities for it to be regarded as a sustainable location for development. The site is, however, within a zone C2 flood risk zone. TAN 15 classifies housing as highly vulnerable development and advises that development plans should not allocate land for this in such areas.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the identified flood risk, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0995) that no modification be made to the DD in response to this objection.**

## LAND TO THE EAST OF THE A499, LLANAELHAEARN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/17	Lord Newborough	Guy D Evans	476

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Llanaelhaearn and be allocated for housing development. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0996) that no modification be made to the DD in response to this objection.**

## NEAR HOLBORN ESTATE - NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/20	Lord Newborough	Guy D Evans (Carter Jonas)	568

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Nefyn and be allocated for housing development. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0997) that no modification be made to the DD in response to this objection.**

## LAND TO THE NORTH OF CAEAU CAPEL HOTEL, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/977/7	D Harden		

### Note

- This objection reference is really B/997/7 and the LPA proof is No 568.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Nefyn and be allocated for housing development because the settlement provides sufficient services and facilities to support this.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.0998) that no modification be made to the DD in response to this objection.**

## LAND TO THE NORTH EAST OF BWTHYN BRYN, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/997/3	D Harden	Guy D Evans	568

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Nefyn and be allocated for housing development because the settlement is considered to provide sufficient services and facilities to support it. The site, however, abuts the consolidated built-up area of Nefyn at only its south west corner. It is almost entirely surrounded by the open countryside and its development would not conform to the advice of PPW (paragraph 9.3.1) that this should be well integrated with and connected to the existing pattern of settlement.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of the proposal on the pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.0999) that no modification be made to the DD in response to this objection.**

## LAND SOUTH OF TAI LÔN, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/997/1	D Harden	Guy D Evans	568

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land within the Local Centre of Nefyn should be allocated for housing development because it is in a sustainable location and would form a logical extension of the settlement's built form.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.1000) that no modification be made to the DD in response to this objection.**

## ALLOTMENTS, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/21	Lord Newborough	Guy D Evans	568

### Note

- The arguments of this objector which relate to Protected Open Space are dealt with in Section B of this report.

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land, which is included within the Development Boundary of the Local Centre of Nefyn, should be allocated for housing development. The site has been in use as allotments since 1896 and, at the time of the inquiry, all the plots were occupied. PPW (paragraph 5.5.18) advises that allotments should be retained, particularly where they have an important open space function and contribute to sustainable development. The site is within the built-up area of the settlement and can be reached on foot from all locations within it. It is, therefore, in a sustainable location. It allows local people to take recreation in the open air and, therefore, has an important open space function.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the important open space function of this land, I conclude that it should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1001) that no modification be made to the DD in response to this objection.**



## TIR Y GARN, PENLON LLYN, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/829/3	Mr Evan Hughes		92
B/36/1	Harry Noel Williams	JM Jones	92

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above land from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objectors argue that two overlapping areas of land should be included within the Development Boundary of the Urban Centre of Pwllheli and be allocated for housing development because this would meet a local need. The land is not vulnerable to flooding and, the objectors argue, a safe vehicular access can be provided.

2. The site is part of a wider area of rising land which forms an important part of the rural setting of the town. Development, by breaching the clear barrier of Penlon Llyn, would erode this contrary to the advice of PPW (paragraph 9.3.3). In any case for the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.1002) that no modification be made to the DD in response to these objections.**

## SITE NEAR LÔN CEREDIGION, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/965/1	Watkin Jones	Dalton Warner Davis	538

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/302/3	Goronwy Owen		

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/56/1	Christine Jones		
B/34/1	TF & CH Tyler		
B/229/1	Richard Williams		

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Pwllheli and be allocated for housing development. He contends that concerns about its vulnerability to flooding can be overcome. The site is within the C1 flood risk zone. TAN15 advises that housing is a form of development which is highly vulnerable to flooding. Sites within zone C1 should be allocated for housing development in plans only if this can be justified in terms of TAN 15 (section 6). The development of this land is not necessary to assist or be part of a local authority regeneration initiative or a strategy to sustain an existing settlement. It is not previously developed land. Its development is not, therefore, justified by the terms of TAN15.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement

patterns that minimise land-take, and to the need to steer housing development away from flood risk areas, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.1003) that no modification be made to the DD in response to this objection.**

**FORMER MANWEB DEPOT SITE, LON CAERDYDD UCHAF, PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection ref. No</b>	<b>Name of objector</b>	<b>Agent</b>	<b>Response Ref.</b>
<b>B/302/4</b>	<b>Goronwy Owen</b>		

**CAE FFERM PENMAEN, PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/600/1</b>	<b>J Jones</b>		

## LAND TO THE NORTH OF THE B4415, RHYDYCLAFDY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/997/4	D Harden	Guy D Evans	563

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that the whole of this parcel of land should be included within the Development Boundary of the Village of Rhydyclafdy and be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1004) that no modification be made to the DD in response to this objection.**

**LAND NEAR INDUSTRIAL ESTATE, Y FFOR**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/770/1</b>	<b>T Alun Williams</b>		

## LAND AT TYN LON FAWR, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/924/19	Lord Newborough	Guy D Evans	565

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Village of Y Ffor and be allocated for housing development because it is well related to the built form of the settlement and adjacent to employment opportunities.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1005) that no modification be made to the DD in response to this objection.**



**DEVELOPMENT BOUNDARIES: LLYN DCA**

## ABERDARON SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/79	Environment Watch Wales & the Borders		115
B/756/10	Environment Watch Wales & the Borders		114

### Note

- Objection B/756/10 is responded to in LPA proof 115 not 114.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Aberdaron should be realigned to exclude areas of undeveloped land between this and the built-up area of the settlement. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1006) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1007) that no other modification be made to the DD in response to this objection.**

## LAND BY MORANNEDD, ABERDARON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/543/1	Alwyn Hughes		560

### Note

- This objection is B/534/1 not B/543/1

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Aberdaron should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1008) that no modification be made to the DD in response to this objection.**

**NEAR CREIGIR WEN WORKSHOPS, ABERSOCH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/960/1</b>	<b>Mrs Lowri Williams</b>	<b>Charles F Jones &amp; Son</b>	

**DEUDRAETH, ABERSOCH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/311/1</b>	<b>TM Wheldon-Williams</b>		

## YNYS OLWEN GARDEN, ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/358/1	Kay Hearth		564

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Abersoch should be realigned to include this land in order to provide for the future development of housing via windfall sites. It is not apparent how a vehicular access could be provided for this land. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1009) that no modification be made to the DD in response to this objection.**

## PLOT IN PENYBENNAR, ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA325

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/705/1	Guy Williams		564

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of objector	Agent	Response Ref
B/756/2154	Environment Watch Wales & the Borders		112

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Abersoch should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and proposes, via NA 325, to draw a Development Boundary to encapsulate this land and several dwellings which abut it. This small group is, however, detached from the consolidated built-up area of Abersoch by a visually significant open space. Its consolidation by further development would reinforce a fragmented pattern of settlement, contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.



**RECOMMENDATION**

**I recommend:**

**(REC.1010) that no modification be made to the DD in response to these objections and, in particular, that NA 325 be not accepted.**

**LAND BY HAULFRYN, ABERSOCH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/1032/1	Mrs C Jones	John Alun Jones	187

**Supporters of Draft Deposit**

Ref No	Name of Supporter	Agent	Response Ref
B/263/1	Mary MacClennan		
B/360/1	Russell Dean		

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Abersoch should be realigned to include this land in order to provide for the future development of housing via windfall sites. At densities prevailing in the locality this site could accommodate some 6 dwellings. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1011) that no modification be made to the DD in response to this objection.**

## LAND BY CEIRIAD BACH & HOPWOOD, ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/581/1	Abersoch Golf Club		564

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Abersoch should be realigned to include this land in order to provide for the future development of affordable housing via Rural Exception sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary to secure affordable housing on a Rural Exception basis because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1012) that no modification be made to the DD in response to this objection.**

## LAND BETWEEN GORSEBANK AND GILFACH GOCH, ABERSOCH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/764/1	Mrs Gillian Rawlins		564
B/624/1	Philip Crabbe		564

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Abersoch should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. One of the objectors postulates an alternative Development Boundary which would reflect the local land form of the site and its proximity to an SSSI and the Llyn AONB.

2. For the reasons I give in the section of this report which relates to affordable housing I have, however, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1013) that no modification be made to the DD in response to these objections.**

## DEVELOPMENT BOUNDARY - BOTWNNOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
A/128/1	Geraint Evans		519

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Botwnnog should be realigned to include unspecified additional land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1014) that no modification be made to the DD in response to this objection.**

## PENYBRYN, CHWILOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/177/4	G&W Jones		566

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Chwilog should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1015) that no modification be made to the DD in response to this objection.**

**LAND BETWEEN LLWYNFOR & MORLAN, CHWILOG & AFONWEN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA327

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/127/1</b>	<b>Adrian Mark Jones &amp; Rona Rees Hooton</b>	<b>John Alun Jones</b>	<b>566</b>

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/756/2156</b>	<b>Environment Watch Wales &amp; the Borders</b>		<b>112</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary for the Village of Chwilog should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and, via NA 327, proposes to extend the Development Boundary to include this site together with a further area of undeveloped land and two additional dwellings. This would promote the extension of a ribbon of development into the open countryside contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1016) that no modification be made to the DD in response to these objections and, in particular, that NA 327 be not accepted.**



**TIR ERW WEN, EDERN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/156/1</b>	<b>W Griffith</b>		

## WHITE LAND, EDERN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/80	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Edern should be realigned to exclude areas of undeveloped land between this and the edge of the consolidated built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1017) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1018) that no other modification be made to the DD in response to this objection.**

## LAND BEHIND RHYD Y BORE COTTAGE, LLANAELHAEARN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/631/1	Brian Pheasey		476

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanaelhaearn should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1019) that no modification be made to the DD in response to this objection.**

## LAND BETWEEN ARLANFOR AND MAESTEG, LLANBEDROG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/871/1	Robyns Owen		101

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanbedrog should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. At the relevant inquiry session he confirmed that the area of the objection site should be reduced to only the frontage strip along the lane which gives it access. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1020) that no modification be made to the DD in response to this objection.**

## LAND BETWEEN BRYNIAU AND GLENNYDD, LLANBEDROG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/42/2	William Lewis & Eunice Olwen Owen		521

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/523/1	P Greenwood		

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Llanbedrog should be realigned to exclude the above site. The area is undeveloped land which lies between the consolidated built-up area of the village and an outlying sporadic development in the open countryside. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the area referred to by the objectors.

### RECOMMENDATIONS

I recommend:

**(REC.1021) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1022) that no other modification be made to the DD in response to this objection.**

**LAND BETWEEN ERIADOR & GLENNYDD, LLANBEDROG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/42/1</b>	<b>William Lewis &amp; Eunice Olwen Owen</b>		
<b>B/30/1</b>	<b>Awen Davies</b>		
<b>B/46/1</b>	<b>Dafydd Jones</b>		

**BY ROCKFIELD, LLANBEDROG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/253/3</b>	<b>Llanbedrog Community Council</b>		<b>521</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary.

**Inspector's Considerations and Conclusions**

1. The objector argues that the above land should not be included within the Development Boundary of the Village of Llanbedrog. The Proposals Map confirms that the LPA proposes that this land be excluded from that alignment.

**RECOMMENDATION**

**I recommend:**

**(REC.1023) that no modification be made to the DD in response to this objection.**



**BY HENDY, LLANBEDROG**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA333

**Conditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/253/1</b>	<b>Llanbedrog Community Council</b>		<b>521</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Village of Llanbedrog should be realigned to exclude the above land. The LPA agrees and, via NA 333, proposes that this land be excluded. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the site referred to by the objector.

**RECOMMENDATIONS**

**I recommend:**

**(REC.1024) that the DD be modified by the acceptance of NA 333;**

**(REC.1025) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1026) that no other modification be made to the DD in response to this objection.**

**BY BRYN BEDOL, LLANBEDROG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/253/4	Llanbedrog Community Council		98
B/195/1	W Williams		98
B/255/1	RA & A Hughes		98
B/232/1	Wil Williams		98

**Supporters of Deposit Draft**

Ref No	Name of Supporter	Agent	Response Ref
B/819/1	Meirion Roberts		
B/799/1	Iorwerth Roberts		

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary of the Village of Llanbedrog should be realigned to exclude an area of land which lies between this and the built-up area of the Village. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.1027) that the DD be modified in accordance with my recommendation (REC.0443)**

**(REC.1028) that no other modification be made to the DD in response to these objections.**

## FIELDS AO 3701, 3702 & 3707

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/782/1	John Jones		521

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llanbedrog should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land abuts the built-up area of the Village on only one side and projects a considerable distance into the open countryside. The majority of it lies beyond a stream on rising ground to the north of the Village. It is not well integrated with the settlement as PPW (paragraph 9.3.1) advises.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1029) that no modification be made to the DD in response to this objection.**

**SITE ADJOINING TY'N DALAR, LLANENGAN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA 334

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/886/1	Mr J Jones		409

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2092	CPRW		409
B/756/2158	Environment Watch Wales & the Borders		112

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Llanengan should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and seeks to achieve this via NA 334. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1030) that no modification be made to the DD in response to these objections and, in particular, that NA 334 be not accepted.**

## MYNYTHO, LLANENGAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/142/1	Ian & Helen Evans		409

### Note

- Notwithstanding the site name above, the LPA describes this land as being opposite Glas y Don, Llanengan.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Llanengan should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1031) that no modification be made to the DD in response to this objection.**

## LAND FROM TY'N FFOS TO MINFFORDD, LLANENGAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/257/1	D B Evans		182
B/323/1	Llanengan Community Council		182

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Llanengan should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.1032) that no modification be made to the DD in response to these objections.**

## LAND NEAR GLAN RHYD, LLITHFAEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/543/1	Steven Worsley		478

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Llithfaen should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. The UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria. In this case the site does not directly adjoin the Development Boundary but is some distance from this in an area of sporadic development within the open countryside.

### RECOMMENDATION

I recommend:

**(REC.1033) that no modification be made to the DD in response to this objection.**



## LAND NEAR GWELFOR, LLITHFAEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/197/3	Mary Jones		478
B/219/1	Mark Worsley		478
B/966/1	DW & P Worsley	John Alun Jones	478

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Village of Llithfaen should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

**I recommend:**

**(REC.1034) that no modification be made to the DD in response to these objections.**

**PART OF FIELD OS 3600, MORFA NEFYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/74/1</b>	<b>AD &amp; PJ Kemply</b>		<b>559</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objectors argue that the proposed Development Boundary for the Village of Morfa Nefyn should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1035) that no modification be made to the DD in response to this objection.**

**NEAR LON Y LLWYN ESTATE, MORFA NEFYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Unconditionally Withdrawn Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/721/1</b>	<b>Gerallt Williams</b>		

**LAND NEAR PLAS TIRION, LON UCHAF, MORFA NEFYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA335

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/191/1	E Nierada & M R Jones		559

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/2093	CPRW		559

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. An objector argues that the proposed Development Boundary for the Village of Morfa Nefyn should be realigned to include this land in order to provide for the future development of housing via windfall sites. The LPA agrees and proposes, via NA 335, to include part of this area within the Development Boundary. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1036) that no modification be made to the DD in response to these objections and, in particular, that NA 335 be not accepted.**

## LAND NEAR ST TUDWAL ESTATE, MYNYTHO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/960/4	Mrs Lowri Williams	Charles F Jones & Son	479

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Mynytho should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1037) that no modification be made to the DD in response to this objection.**

## FIELDS OS 0062 & 0058 NEAR PARCIAU, MYNYTHO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/313/3	EB & P Smith	J Merfyn Pugh	479

### Note

- These objectors confirm that this agent is no longer acting for them.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Mynytho should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

**I recommend:**

**(REC.1038) that no modification be made to the DD in response to this objection.**

## ALIWEL, MYNYTHO

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objectors of Deposit Draft

Ref No	Name of Objector	Agent	Response Ref
B/313/3	EB & P Smith	J Merfyn Pugh	479

### Note

- The LPA has duplicated this objection on the skeleton report. It is the same as the objection in relation to the Fields OS 0062 & 0058 Near Parciau, Mynytho.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Mynytho should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1039) that no modification be made to the DD in response to this objection.**

## LAND NEAR BRO GWYLLWYR ESTATE, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/364/1	D Hughes		185

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Nefyn should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1040) that no modification be made to the DD in response to this objection.**



## LAND BEHIND NEFYN PRIMARY SCHOOL, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/978/1	Andrew Swallow	Susan Hill	568

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Nefyn should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1041) that no modification be made to the DD in response to this objection.**

## LAND AT PENSI A'R DRE, NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/279/1	John Keay		568

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Nefyn should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1042) that no modification be made to the DD in response to this objection.**

**CAE MWD, PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/731/4</b>	<b>Iwan Edgar</b>		<b>538</b>

**Note**

- This objection is dealt with in the section of this report which relates to the proposed housing allocation at Abererch Road, Pwllheli.

**NANT STIGALLT, PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/731/5</b>	<b>Iwan Edgar</b>		

**Note**

- This objection is dealt with in the section of this report which relates to the proposed housing allocation at Abererch Road, Pwllheli.

**TIR LLWYNFFYNNON, FFORD CAERNARFON, PWLLHELI**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/174/1</b>	<b>Jane Buckley</b>		<b>538</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Urban Centre of Pwllheli should be realigned to include this land in order to provide for the development of market housing. This extensive area of land does not abut the consolidated built-up area of the town at any point but does abut the edge of the area proposed to be included within the Development Boundary by NA 336. It is an isolated area within the open countryside in an elevated position on the valley side. It is not well connected to the existing built-up area and its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

**RECOMMENDATION**

**I recommend:**

**(REC.1043) that no modification be made to the DD in response to this objection.**

## LLWYNFFYNNON, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/749/1	Mr & Mrs H Fisher-Jones		538

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Urban Centre of Pwllheli should be realigned to include this land in order to provide for the development of market housing. This extensive area of land does not abut the consolidated built-up area of the town at any point, but does abut the edge of the area proposed to be included within the Development Boundary by NA 336. It is an isolated area within the open countryside in an elevated position on the valley side. It is not well connected to the existing built-up area and its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

### RECOMMENDATION

I recommend:

**(REC.1044) that no modification be made to the DD in response to this objection.**

## LAND NEAR ARGRAIG, PENLON LLYN, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/940/1	Bob Parry & Co.	Berwyn Owen	154

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Urban Centre of Pwllheli should be realigned to include this land in order to provide for the development of market housing. The site is part of a wider area of rising land which forms an important part of the rural setting of the town. Development, by breaching the clear barrier of Penlon Llyn, would erode this contrary to the advice of PPW (paragraph 9.3.3)

### RECOMMENDATION

I recommend:

**(REC.1045) that no modification be made to the DD in response to this objection.**

## REAR OF VETERINARY SURGERY, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/749/5	Mr & Mrs H Fisher Jones		538

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Urban Centre of Pwllheli should be realigned to exclude this land because it is in a flood risk area and its development would generate traffic which could not be accommodated on the local highway system. The site is previously developed land, situated within the heart of the built-up area of the town. It is, therefore, appropriate for it to be included within the Development Boundary. It is in a C1 flood risk zone but this does not preclude all types of development. The plan is to be read as a whole. Policy CH31 provides that planning permission will be refused for schemes if the existing road network is not of sufficient standard to deal with the resulting flow of traffic and cannot be improved to accommodate this.

### RECOMMENDATION

I recommend:

**(REC.1046) that no modification be made to the DD in response to this objection.**



**DEVELOPMENT BOUNDARY, RHOSHIRWAUN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/575/9</b>	<b>Aberdaron Community Council</b>		

## RHOSHIRWAUN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/12	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Rhoshirwaun should be realigned to exclude areas of undeveloped land between this and the edge of the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1047) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1048) that no other modification be made to the DD in response to this objection.**

**FIELDS O.S NOS 7182, 7391, PART OF OS 7182 AND RIVER, RHYDYCLAFDY**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/362/1</b>	<b>Robert GP Parry</b>		<b>563</b>
<b>A/121/1</b>	<b>Robert Parry</b>		<b>563</b>

**Note**

- Objection A/121/1 is a duplication of objection B/362/1.

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Rhydyclafdy should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. Part of the site is unsuitable for housing development because it is within a C2 flood risk zone. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1049) that no modification be made to the DD in response to these objections.**

**FIELD OS NO. 6167, RHYDYCLAFDY**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/975/1</b>	<b>Dr Tudur Owen</b>	<b>Yale &amp; Hemmings Ltd</b>	<b>563</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Village of Rhydyclafdy should be realigned to include this land in order to provide for the future development of housing via windfall sites. The land abuts the built-up area of the Village only at its extreme northern corner. It is, for all practical purposes, entirely surrounded by open countryside. Its development would promote a fragmented pattern of settlement, contrary to the advice of PPW (paragraph 9.3.1).

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1050) that no modification be made to the DD in response to this objection.**

## LAND TO THE NORTH OF THE B4415, RHYDYCLAFDY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/773/41	Chris Wynne (North Wales Wildlife Trust)		563

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Rhydyclafdy should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1051) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1052) that no other modification be made to the DD in response to this objection.**

**BEER GARDEN, PENRHYN ARMS, SARN MELLTEYRN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/51/2</b>	<b>Dennis &amp; Irene Spencer</b>		<b>495</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objectors argue that the proposed Development Boundary for the Village of Sarn Mellteyrn should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1053) that no modification be made to the DD in response to this objection.**

## NEAR THE HALL, SARN MELLTEYRN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA338

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/599/1	Malcolm Roberts		495

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/21 59	Environment Watch Wales & the Borders		110

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. An objector argues that the proposed Development Boundary for the Village of Sarn Mellteyrn should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees and, via NA 338, proposes to extend the Development Boundary to include this area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1054) that no modification be made to the DD in response to these objections and, in particular, that NA 338 be not accepted.**

## DEVELOPMENT BOUNDARY - TREFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/119/1	Gwyndaf Hughes		567

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that no further house-building should take place within the Village of Trefor. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would limit new house-building to genuine infill sites within the fabric of the settlement.

### RECOMMENDATIONS

I recommend:

**(REC.1055) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1056) that no other modification be made to the DD in response to this objection.**



## ADJACENT TO MAES GWYDR, TREFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/673/1	Llanaelhaearn Community Council		567

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Trefor should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1057) that no modification be made to the DD in response to this objection.**

## LAND ADJACENT TO BRYN, TREFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/153/1	A Hughes		167

### Note

- Objection B/153/1 is responded to in LPA proof 567 not 167.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Trefor should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objector seeks. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1058) that no modification be made to the DD in response to this objection.**

## TY CAM FARM, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/992/1	Richard Wyn Roberts	Architectural Design Services	565

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Y Ffor should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement. If this objector has a valid justification for an agricultural dwelling, Policy CH7 provides the framework within which it can be determined.

### RECOMMENDATION

I recommend:

**(REC.1059) that no modification be made to the DD in response to this objection.**

## INFILL SITES, Y FFOR

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/201/1	Tudur Jones		565
B/716/1	Dr Owain & Mrs Edwards		565
B/717/1	Mr Thomas Jones		565

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Two of the objectors argue that the proposed Development Boundary for the Village of Y Ffor should be realigned to include additional land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objectors seek. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

2. The remaining objector argues that the proposed Development Boundary should be realigned to include additional land in order to provide for the future development of larger houses via windfall sites. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1060) that no modification be made to the DD in response to these objections.**

**INFRASTRUCTURE: LLYN DCA**

## MORFA NEFYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/688/1	Bleddyn Jones		559

### Main Issue

- Whether the DD is appropriate, having regard to the provision of necessary infrastructure.

### Inspector's Considerations and Conclusions

1. The objector argues that the UDP should make provision for car parks within Nefyn and Morfa Nefyn. PPW (paragraph 8.5.2) advises that blight should be minimised by including in UDPs only firm scheme on which work will commence within the plan period. No funded scheme has been identified for the provision of public car parking in these localities. It would, therefore, be inappropriate to identify particular sites for this purpose.

### RECOMMENDATION

**I recommend:**

**(REC.1061) that no modification be made to the DD in response to this objection.**

**NEFYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/688/3</b>	<b>Bleddyn Jones</b>		<b>568</b>

**Note**

- Objection B/688/3 is dealt with in the section of this report which relates to infrastructure at Morfa Nefyn.

**REDEVELOPMENT SITES: LLYN DCA**



## NORTH QUAY, PWLLHELI

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/51	CCW		538

### Main Issue

- Whether the DD is appropriate, having regard to the potential for coastal erosion.

### Inspector's Considerations and Conclusions

1. The objector expresses concern that the proposed Redevelopment Site at North Quay, Pwllheli, may be vulnerable to coastal erosion. Substantial work was undertaken in the 1990s to safeguard this area. The site is separated from the harbour by a massive dock wall and a road. The Development Brief for this site confirms that it is proposed to accommodate a mixed use scheme of land uses related to town centre activities and those linked to sailing/seaside, leisure, hotel, commercial uses and offices. TAN15 confirms that these are classified as 'less vulnerable to flooding'.

### RECOMMENDATION

I recommend:

**(REC.1062) that no modification be made to the DD in response to this objection.**

**PLAY AREAS: LLYN DCA**

## NEAR THE SCHOOL, ABERDARON

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/21	Aberdaron Community Council		560

### Main Issue

- Should the school playing field and adjacent field be designated as a Protected Playing Area.

### Inspector's Considerations and Conclusions

1. The objector has not defined the precise extent of the land in question. On the basis of the Council's interpretation of the representation, it is evident that it relates to land immediately behind the school. The supporting text to Policy CH40, which deals with safeguarding playing fields, explains that it applies to those areas shown on the proposals map that are within Development Boundaries, as well as areas used for such purposes but which lie outside towns and villages. The Council explains that it is not practical to identify every playing area that lies outside settlements as some may be outside the coverage of inset maps. Given this approach it would be inappropriate to begin to identify some play area sites that lie outside development limits. Thus, I consider that there should be no change to the Plan in this respect.

### RECOMMENDATION

I recommend:

**(REC.1063) that no modification be made to the DD in response to this objection.**

## OPEN SPACE NEAR THE QUEENS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/575/20	Aberdaron Community Council		560

### Main Issue

- Whether the DD is appropriate, having regard to the role of public amenity spaces.

### Inspector's Considerations and Conclusions

1. An area of land adjacent to the sea front at Aberdaron has been designated in the DD as Protected Open Space. It is an area of hard-standing, provided with benches for public use as an informal gathering or picnic area. The objector seeks to secure its redevelopment.

2. PPW (paragraph 11.2.3) advises that UDPs should protect from development those open spaces that have significant amenity or recreational value to the community. Due to its location I consider that this open space conforms to that advice and should be afforded a measure of protection. Policy B11 and its supporting text provide the context for the consideration of planning applications to redevelop such areas.

### RECOMMENDATION

I recommend:

**(REC.1064) that no modification be made to the DD in response to this objection.**

**HIGHWAYS: LLYN DCA**

## ROAD FROM OCEAN HEIGHTS, CHWILOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/50/1	Kathleen Steele		566

### Note

- Objection B/50/1 has been unconditionally withdrawn.

**SITE-SPECIFIC OBJECTIONS: PORTHMADOG DCA**

**SETTLEMENT STATUS: PORTHMADOG DCA**



## BRYNCIR SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/920/1	Jean Evans	Merfyn Jones-Evans	452

### Main Issue

- Whether the DD is appropriate, having regard to the status of this settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, classifies Bryncir as a Rural Village. The objector argues that a Development Boundary should be designated for it, (i.e. that it should be re-classified as a Village) with a view to the development of a substantial area of land for affordable housing via windfall sites. Bryncir is a small, isolated, sporadic development in the open countryside. Further residential development there would reinforce an unsustainable pattern of settlement contrary to PPW advice. For this reason it should not be re-classified as a Village. Furthermore for the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of Villages should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for the exclusion of this land from the Development Boundary even if the settlement was re-classified as a Village.

### RECOMMENDATION

I recommend:

**(REC.1065) that no modification be made to the DD in response to this objection.**

## MORFA BYCHAN SETTLEMENT STATUS

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/149/1	Helen Pritchard		465
B/635/1	RE Bridges		465

### Main Issue

- Whether the DD is appropriate, having regard to the status of the settlement.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, has classified Morfa Bychan as a Village. The objectors argue that no further housing development should take place there in order to protect its character and to avoid areas of flood risk. The proposed Development Boundary very tightly encloses the consolidated built-up area of the Village, There are, therefore, very limited opportunities for further development in this particular settlement. The plan must be read as a whole. Policies B21 and B22 secure the application of good design principles and the protection of the amenities of local communities. Policy B28 secures that proposals for vulnerable development will not be permitted in areas that are at risk of flooding.

### RECOMMENDATION

I recommend:

**(REC.1066) that no modification be made to the DD in response to these objections.**

**HOUSING GENERAL: PORTHMADOG DCA**

## GENERAL HOUSING IN CRICCIETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/25/2	Margaret Gwenda Fisher		457

### Note

- Objection B/25/2 is dealt with in the section of this report which relates to 'Affordable Housing for Local Need Text'.

## GENERAL HOUSING IN PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/334/1	Robert Lewis		481

### Main Issue

- Whether the DD is appropriate, having regard to the omission of allocations for housing development at Porthmadog.

### Inspector's Considerations and Conclusions

1. The objector notes that no housing land allocations have been proposed at the Urban Centre of Porthmadog and argues that land within the Development Boundary of that settlement should be allocated for that purpose. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that no additional land should be allocated for housing development at Porthmadog. The scope does, however, exist under the terms of Policy CH2 for the residential development of windfall sites. Such proposals would, of course, have to satisfy the requirements of Policy B28 in relation to flood risk.

### RECOMMENDATION

I recommend:

**(REC.1067) that no modification be made to the DD in response to this objection.**

**HOUSING LAND ALLOCATIONS: PORTHMADOG DCA**

## HOUSING ALLOCATIONS IN PORTHMADOG DCA

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/784/1	Penrhyndeudraeth Community Council		34

### Note

- Objection B/784/1 is dealt with in the section of this report which relates to Policy CH1.

## NEAR SURGERY, CRICCIETH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA349

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/598/1	Andrew Ferguson		175

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/25/1	Margaret Gwenda Fisher		175
B/706/1	Mr W Williams (Petition with 35 names)		175

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1467/2001	RR Carey-Evans		175
B/1604/2004	Hugh Gwynne		175
B/1358/2001	Diana Fon Roberts		175

### Supporters of Pre-Inquiry Proposed Change

Ref No	Name of Supporter	Agent	Response Ref
B/1584/2001	Mark Anthony Quaek		
B/1586/2001	Vatherine Patricia Quaek		
B/1554/2003	Ronald Fisher		
B/25/2003	Margaret Gwenda Fisher		
B/25/2004	Margaret Gwenda Fisher		

### Note

- Objection B/1467/2004 is dealt with in this section of the report.

### Main Issues

- The need for new house building in Criccieth.



- The effect of development on the character and appearance of Criccieth.
- The effect on the safe and free flow of traffic.
- The effect on nature conservation interests.
- The availability of necessary infrastructure.

## **Inspector's Considerations and Conclusions**

### *The need for new house building in Criccieth*

1. The LPA, at DD stage, proposes that 0.74ha of land Near the Surgery at Criccieth be allocated for the development of 30 dwellings. Objectors argue that there is no need for that number to be developed in the town. The estimate of need for house building has been carried out at a UDP-wide scale. The plan-wide total requirement was then distributed between the defined Dependency Catchment Areas. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or in other locations which are or can be well served by public transport or can be reached by walking or cycling.

2. Porthmadog has been classified as an Urban Centre and principal settlement within its catchment area. Housing development there is, however, severely constrained by the risk of flooding. The LPA has, therefore, sought to identify housing sites within Local Centres such as Criccieth. This latter settlement contains a wide range of retail and leisure facilities together with a primary school and good public transport links by bus and rail to Porthmadog and Pwllheli. It should therefore be accorded a high priority when it comes to accommodating the housing requirement which has been identified for the catchment area as a whole. It must be regarded as a reasonably sustainable location which, in the absence of sufficient capacity at Porthmadog, is capable of supporting the scale of residential development proposed.

### *The effect on the character and appearance of Criccieth*

3. The proposed allocation is situated within the built-up area of Criccieth immediately to the rear of High Street. It is close to existing residential development and the LPA, in its proof of evidence No 175 (paragraph 4.6), regards it as being a logical continuation of the existing built form. Since the publication of the DD plan, however, a Character Assessment of the adjacent conservation area has been considered by the Council. As a result of this the boundary of that area has been formally extended to include the site of the proposed housing allocation Near to the Surgery.

4. The Character Assessment (which forms part of the Criccieth Conservation Area Appraisal – September 2004) recognised the site of the proposed housing allocation as an open space which is of importance to the character and appearance of the conservation area and should, therefore, be included within it. In response to this assessment the LPA proposes, via NA 349, to delete the housing allocation and exclude the site from the Development Boundary.

5. The conservation area lies at the very centre of Criccieth at a point where the principal roads to and through the town meet. Its character is that of handsome terraces of dwellings and related public buildings which front onto visibly

significant open spaces. These, around the junction of the A497 and B4411 roads, give the centre of the town a spacious and elegant quality.

6. The open agricultural land which is the subject of the DD allocation Near to the Surgery provides clear separation between this spacious and formal juxtaposition of terraces and lawns and the areas of more recent densely developed conventional residential estates which lie to the west. It is, in my view, essential to maintain this latter area in an undeveloped state so that the core of the conservation area remains visually distinct from the surrounding development for the benefit of the settlement as a whole. This consideration is, in my view, sufficient justification, in its own right, for the deletion of the proposed housing allocation.

7. An objector to the Pre-inquiry Proposed Change owns both the land Near the Surgery and other land near North Terrace, Criccieth. This latter site is proposed to be allocated for housing development via NA 350. In response to a planning application the LPA has resolved to grant planning permission for the development of this latter site subject to the completion of a planning agreement under S106 of the Act.

8. At the inquiry the objector confirmed that he preferred to develop the North Terrace site rather than that Near the Surgery. He nevertheless expressed concern that the requirements of the planning agreement might unacceptably erode the financial viability of the North Terrace site. He, therefore, sought a 'fall-back position' that, in case this eventuality did arise, the land Near the Surgery should, although deleted as a housing allocation, be retained within the Development Boundary of Criccieth so that it could be considered for the development of affordable housing. For the reasons I have given I consider that the land Near the Surgery should remain undeveloped. It is, therefore, appropriate to exclude it from the Development Boundary.

#### *The effect on nature conservation interests*

9. Objectors make generalised references to the nature conservation value of the proposed allocation. The plan is to be read as a whole. Policy B20 provides that, when a development is approved, planning conditions and/or obligations will be used in order to protect the nature conservation value of the site.

#### *The availability of necessary infrastructure*

10. Objectors express concern that there may be insufficient capacity in the local surface water drainage system. The plan must be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure.

## **RECOMMENDATIONS**

### **I recommend:**

**(REC.1068) that the DD be modified by the acceptance of NA 349 to both delete the proposed housing allocation Near to the Surgery, Criccieth, and to remove the land from the Development Boundary;**

**(REC.1069) that no other modification be made to the DD in response to these objections.**

**NEAR NORTH TERRACE - CRICCIETH**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA350

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
B/1608/2001	Mrs Duckett		175
B/1612/2001	Fflur ap Roberts		175
B/1592/2001	Tecwyn Sion Dafydd Evans		175
B/1560/2001	B.Gifford		175
B/1569/2001	Margaret Tudor		175
B/1553/2001	Claire Louise Roberts		175
B/1583/2001	Keri Pemberton		175
B/1629/2001	Dr John Shepherd		175
B/1454/2001	B. Richards		175
B/1458/2001	Iola Shutes		175
B/1468/2001	Raphael Duckett		175
B/1490/2001	Mrs Rose Hedger		175
B/1507/2001	George Goldman		175
B/1513/2001	G Williams		175
B/1525/2001	Mrs P Pennington		175
B/1536/2001	R Harrison		175
B/1386/2001	Dr M.S. Kukula		175
B/1636/2001	Julie Butler		175
B/1631/2001	Miss Claire Woodhouse		175
B/1635/2001	Elsbeth Gwynne		175
B/1671/2001	S Threadgill		175
B/1677/2001	No Name		175
B/1672/2001	C. Threadgill		175
B/1676/2001	E Jones		175
B/1678/2001	Mr P Rees		175
B/1576/2001	Mrs D Aspin		175

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B/1578/2001	Maureen Thomas		175
B/1547/2001	Mr WM Griffiths		175
B/1545/2001	C. Davey		175
B/1550/2001	Diane O'Donnell		175
B/1571/2001	Mr & Mrs Crossley		175
B/1566/2001	Mary Williams		175
B/1572/2001	M Evans		175
B/1581/2001	Jose Camp		175
B/1582/2001	L Durham		175
B/1556/2001	N Pemberton		175
B/1557/2001	Alan Bailey		175
B/1580/2001	David Thomas		175
B/1574/2001	Dona Williams		175
B/1567/2001	David Tecwyn Thomas		175
B/1570/2001	John Tudor		175
B/1577/2001	David Bailey		175
B/1594/2001	Mrs J Garnett		175
B/1609/2001	Richard Roberts		175
B/1562/2001	Sheila Griffiths		175
B/1564/2001	Nell Rowlands		175
B/1585/2002	Robert Jones		175
B/1561/2001	Elizabeth Evans		175
B/1563/2001	Carys Wyn Roberts		175
B/1590/2001	Mr MW Garnett		175
B/1591/2001	Nicholas Jones		175
B/1632/2001	L Gifford		175
B/1597/2001	Anita Williams		175
B/1616/2002	J Nicholson		175
B/1630/2001	Brian Evans		175
B/1604/2001	Hugh Gwynne		175
B/1618/2001	Buddug Roberts		175
B/1633/2001	James Hulme		175
B/1605/2001	D Burnett		175
B/1598/2001	Mr D Stephens		175
B/1674/2001	GT Williams		175
B/1679/2001	No name		175
B/1606/2001	Alun Roberts		175
B/1593/2001	Tecwyn Evans		175
B/1610/2001	Rhiannon Flur ap Richard		175
B/1634/2001	Amy Watkins		175

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B/1624/2001	Sharon Roberts		175
B/1628/2001	Brian Jones		175
B/1601/2001	Mrs G Williams		175
B/1602/2001	Aled Williams		175
B/1617/2001	John O'Donnell		175
B/1613/2001	Kathryn Pemberton		175
B/1626/2001	Huw John Roberts		175
B/1614/2001	Sam Roberts		175
B/1615/2001	Mrs P Stephens		175
B/1620/2001	David Roberts		175
B/1627/2001	Georgina M Jones		175
B/1619/2001	Elen Gwynne		175
B/1622/2001	Gareth Jones		175
B/1623/2001	Glenys Owen		175
B/1673/2001	K Threadgill		175
B/1675/2001	Eirwen Williams		175
B/1456/2001	Cynthia Shutes		175
B/1481/2001	Mrs Irene Stockbridge		175
B/1482/2001	A.C. Stockbridge		175
B/1462/2001	K Watkins		175
B/1488/2001	Griffith Jones		175
B/1489/2001	Roger Green		175
B/1467/2001	RR Carey-Evans		175
B/1506/2001	M Smith		175
B/1514/2001	Mr DO Roberts		175
B/1512/2001	M.E. Scragg		175
B/1526/2001	J Thomas		175
B/1559/2001	N Hunt		175
B/1487/2001	Ellis E Griffith		175
B/1503/2001	Roisin Roberts		175
B/1539/2001	EA Regan		175
B/1491/2001	David TC Hedger		175
B/1502/2001	Olwen Williams		175
B/1522/2001	Mrs A Dalton		175
B/1552/2001	Allen Powell		175
B/1494/2001	Peter Evans		175
B/1573/2001	Robert Gwilym Jones		175
B/1589/2001	Ben Jones		175
B/1516/2001	Mr S Dalton		175

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B/1544/2001	BJ Walter	175
B/1486/2001	Ann Jones	175
B/1505/2001	VG Williams	175
B/1508/2001	HW Owen	175
B/1523/2001	Mrs D Preval	175
B/1515/2001	Euron Thomas	175
B/1541/2001	JH Johnson	175
B/1554/2001	Ronald Fisher	175
B/1518/2001	M Thomas	175
B/1529/2001	JE Taylor	175
B/1533/2001	John Threadgill	175
B/1532/2001	James Humphreys	175
B/1546/2001	Cathryn Davey	175
B/1565/2001	Lowri Williams	175
B/1543/2001	B Owen	175
B/1595/2001	Sian Williams	175
B/1540/2001	Mrs E Felder	175
B/1551/2001	Gwenda Powell	175
B/1568/2001	Wendy Scrase	175
B/1504/2001	David Regan	175
B/1517/2001	Elizabeth Ellis	175
B/1519/2001	E. Bailey	175
B/1537/2001	KE Taylor	175
B/1495/2001	D Roberts	175
B/1510/2001	Mr D Roberts	175
B/1530/2001	Perry D Taylor	175
B/1538/2001	DT Thomas	175
B/1520/2001	M Shakespeare	175
B/1528/2001	Robert Thomas	175
B/1535/2001	S. Regan	175
B/1493/2001	Delyth Lloyd	175
B/1496/2001	A.C. Brown	175
B/1511/2001	Mrs C Pritchard	175
B/1531/2001	Kirsty Taylor	175
B/1558/2002	Myfanwy Palmer	175
B/1524/2001	Mrs B Duce	175
B/1555/2001	Kevin Pemberton	175
B/1509/2001	Mrs D Roberts	175
B/1521/2001	B Broadhurst	175
B/1527/2001	MS Thomas	175
B/1534/2001	Robat Rhys Griffiths	175

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<b>B/1443/2001</b>	<b>Mrs E Birtwistle</b>		<b>175</b>
<b>B/1370/2001</b>	<b>Leslie A Hill</b>		<b>175</b>
<b>B/1370/2003</b>	<b>Leslie A Hill</b>		<b>175</b>
<b>B/1378/2001</b>	<b>Diane Jackson</b>		<b>175</b>
<b>B/1390/2001</b>	<b>Mrs Myfanwy Blackwell</b>		<b>175</b>
<b>B/1450/2001</b>	<b>Micheline Renard</b>		<b>175</b>
<b>B/1461/2001</b>	<b>S Roberts</b>		<b>175</b>
<b>B/1455/2001</b>	<b>Ian Shutes</b>		<b>175</b>
<b>B/1459/2001</b>	<b>Mr C.M. Shutes</b>		<b>175</b>
<b>B/1484/2001</b>	<b>Bryn Anwyl Jones</b>		<b>175</b>
<b>B/1485/2001</b>	<b>Mrs M Jones</b>		<b>175</b>
<b>B/1451/2001</b>	<b>H Roberts</b>		<b>175</b>
<b>B/1460/2001</b>	<b>N Roberts</b>		<b>175</b>
<b>B/1457/2001</b>	<b>Ffion Shutes</b>		<b>175</b>
<b>B/1452/2001</b>	<b>Mr &amp; Mrs P Bayne</b>		<b>175</b>
<b>B/1453/2001</b>	<b>Mrs Megan Pemberton</b>		<b>175</b>
<b>B/1363/2001</b>	<b>Richard White</b>		<b>175</b>
<b>B/1377/2001</b>	<b>David Jackson</b>		<b>175</b>
<b>B/1364/2001</b>	<b>Glenys White</b>		<b>175</b>
<b>B/1383/2001</b>	<b>Dr I H Birtwistle</b>		<b>175</b>
<b>B/188/2004</b>	<b>Robert Jones</b>		<b>175</b>
<b>B/25/2005</b>	<b>Margaret Gwenda Fisher</b>		<b>175</b>
<b>B/41/2002</b>	<b>Nigel Smith</b>		<b>175</b>

**Supporters of Pre-Inquiry Proposed Change**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/969/2036</b>	<b>Welsh Water</b>		

**Main Issues**

- The need for new house building in Criccieth.
- The effect of development on the character and appearance of the town.
- The effect of development on the safe and free flow of traffic.
- The effect of development on Welsh language and culture.
- The effect of development on the tourism potential of Criccieth.
- The availability of necessary infrastructure.



## Inspector's Considerations and Conclusions

### *The need for new house building in Criccieth*

1. The LPA, at Pre-inquiry Proposed Change stage proposes, via NA 350, to extend the Development Boundary of Criccieth and to allocate within this area 1.22ha of land near North Terrace for the development of 30 dwellings. Objectors argue that there is no need for that number to be developed in the town. For the reasons I give in the section of this report which relates to land Near the Surgery, at Criccieth I have concluded that Criccieth is a reasonably sustainable location which, in the absence of sufficient capacity at Porthmadog, is capable of accommodating housing development on the scale proposed. I note that, in response to a planning application, the LPA has resolved to grant planning permission for the residential development of this site subject to the completion of a planning agreement under S106 of the Act.

### *The effect of development on the character and appearance of the town*

2. Objectors argue that the proposed allocation is sufficiently near to the boundary of the Criccieth Conservation Area, as both originally designated and as recently extended, that development upon it would cause demonstrable harm to its setting. The proposed allocation is, however, separated from these areas by visually significant existing development on the west side of the B4411 road. Only very limited glimpses of development on the proposed allocation will be obtained from the conservation area and vice versa. I am satisfied that the proposed allocation could be developed without unacceptable erosion of the setting of the conservation area.

### *The effect of development on the safe and free flow of traffic*

3. Objectors express concern that the B4411 road serving the proposed allocation is heavily used and that the traffic generated by additional housing may overload it. The site is, however, only some 400m from the centre of the town and its related retail, business and public transport links. It is in a highly sustainable location which has the potential to reduce the generation of trips by private car. In any case the plan is to be read as a whole. Policy CH31 provides that development proposals would not be approved unless provision is made for a safe vehicular access and the existing road network is of a standard to deal with the expected flow of traffic.

### *The effect of development on Welsh language and culture*

4. Objectors present a generalised argument that the construction of additional dwellings would, by attracting potential occupiers from other parts of the country, erode the position of the Welsh language in the local community. PPW (paragraph 9.2.4) advises that, normally, there should be no restriction on the occupancy of market housing. I have not been provided with the robust evidence referred to in that paragraph to justify a departure from this approach. The alternative to unrestricted occupation of the market houses would be to make no allocation at all. However, for the reasons I give elsewhere in this section of the report I have concluded that Criccieth is an appropriate place to locate market housing in the interests of the wider area.

*The effect of development on the tourism potential of Criccieth*

5. Objectors argue that development of this land would decrease the attractiveness of Criccieth to tourists and, thereby, erode the profitability of local businesses. The site does not interact visually with the town centre conservation area or the castle, promenade or beaches which are the main tourist attractions. In any case the introduction of up to 30 new households is, itself, likely to have a significant beneficial effect on local businesses.

*The availability of necessary infrastructure*

6. Objectors express concern that the local sewerage system would be unable to support the additional dwellings proposed and that the health care facilities would be overloaded. The plan is to be read as a whole. Policy CH16 provides that development proposals will be refused unless there is an adequate provision of necessary infrastructure. Policy CH35, as proposed to be amended by NAP 53, provides that, in the event that a proposed development is not adequately supported by community services, planning conditions or agreements will be imposed to secure the necessary facilities.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.1070) that the DD be modified by the acceptance of NA 350;**

**(REC.1071) that no other modification be made to the DD in response to these objections.**

## NEAR CANOL CAE – PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/622/3	Morris Griffith Thomas		34
B/784/5	Penrhyndeudraeth Town Council		34

### Main Issues

- The extent of the allocation.
- The effect on the safe and free flow of traffic.

### Inspector's Considerations and Conclusions

#### *The extent of the allocation*

1. The LPA, at DD stage, proposes to allocate 1.13ha of land near Canol Cae, Penrhyndeudraeth, for the development of 28 dwellings. An objector argues that the allocation should be extended to incorporate a piece of adjacent land to the north east of that proposed. This area was subject to a planning application in 1972 to develop a single dwelling. Planning permission has already been granted and is being implemented on part of this proposed additional land. That area does not need an allocation to confirm a commitment to its development. The remainder lies within the Development Boundary of Penrhyndeudraeth. Policy CH3 provides the appropriate framework within which any future planning application could be considered.

#### *The effect on the safe and free flow of traffic*

2. Another objector expresses concern that the site would rely on a new vehicular access to the A487 road only some 300m from the junction with the proposed Porthmadog Bypass. The Local Highway Authority is satisfied that a safe entrance to the site can be provided from that highway. In any case the plan is to be read as a whole. Policy CH31 provides that development proposals will be approved only if provision can be made for a safe vehicular access and the existing road network is of sufficient standard to accommodate the expected extra traffic.

### RECOMMENDATION

**I recommend:**

**(REC.1072) that no modification be made to the DD in response to these objections.**

## NEAR MAES TEG, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA353

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1036/1	Maesteg residents (petition with 32 names)		34
B/86/1	D Evans		34
B/670/1	Mr & Mrs D Llwyd		34
B/596/1	Bethan Foster		34
B/227/1	Paul Jones		34
B/531/1	M Jones		34
B/620/1	Mr & Mrs W Herbert		34
B/147/1	J Hughes		34

### Draft Deposit Conditionally Withdrawn

Objection Ref No	Name of Objector	Agent	Response Ref
B/522/1	Robert Jones		34
B/784/4	Penrhyndeudraeth Community Council		34
B/784/3	Penrhyndeudraeth Community Council		34
B/345/1	William Owen		34
B/1327/1	Brian Jones		34
B/554/1	Martin & Alison Duncan		34

### Main Issue

- Whether the DD is appropriate, having regard to the likelihood that the site will be brought forward for development.

### Inspector's Considerations and Conclusions

1. The LPA, at DD stage, proposes that 1.0ha of land near Maes Teg, Penrhyndeudraeth, be allocated for the development of 24 dwellings. PPW (paragraph 9.2.3) advises that housing land provided for in development plans must be free or readily freed from, among other things, ownership constraints. In the period following publication of the DD the owner of the proposed allocation has confirmed that he is not in a position to release the land for housing development. Its continued allocation would not generate dwellings to meet the identified requirement, contrary to PPW advice. For this reason I concur with the LPA that

this allocation should be deleted and the land excluded from the Development Boundary. The LPA proposes NA 353 to achieve this.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.1073) that the DD be modified by the acceptance of Pre-inquiry Proposed Change NA 353;**

**(REC.1074) that no other modification be made to the DD in response to these objections.**

## NEAR CAR PARK – PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA354

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1651/2001	Mrs M.A. Roberts		34
B/784/2006	Penrhyndeudraeth Town Council		34
B/969/2037	Welsh Water		
B/1366/2001	Mr & Mrs RA Evans		34
B/1367/2001	Carys W Jones		34

### Supporters of Pre-Inquiry Proposed Changes

Ref No	Name of Supporter	Agent	Response Ref
B/969/2037	Welsh Water		

### Main Issues

- The need for new house building in Penrhyndeudraeth.
- The effect of development on the safe and free flow of traffic.
- The availability of necessary infrastructure.
- The effect on nature conservation interests.

### Inspector's Considerations and Conclusions

#### *The need for new house building in Penrhyndeudraeth*

1. The LPA proposes at Pre-inquiry Proposed Change stage, via NA 354, to allocate 0.99ha of land near the car park at Penrhyndeudraeth for the development of 31 dwellings and to extend the Development Boundary to include this. Objectors argue that there is no need for that number to be developed in the town. The estimate of need for house building has been prepared at a UDP wide-scale and the plan-wide total requirement has been distributed between the defined Dependency Catchment Areas. There is no body of research or analysis on which to base a conclusion as to the appropriate level of house building in individual settlements. PPW (paragraph 2.5.3) advises that major generators of travel demand such as housing should be located within existing urban areas or in other locations which are, or can be, well served by public transport or can be reached by walking or cycling.

2. Porthmadog has been classified as an Urban Centre and principal settlement within its catchment area. Housing development there is, however, severely constrained by the risk of flooding. The LPA has, therefore, sought to identify housing sites within Local Centres such as Penrhyndeudraeth. This latter settlement contains a wide range of retail and leisure facilities together with a primary school and good public transport links by bus and rail to Porthmadog. It should therefore be accorded a high priority when it comes to accommodating the housing requirement which has been identified for the catchment area as a whole. It must be regarded as a sustainable location which is capable of supporting the scale of residential development proposed. The site is, furthermore, previously developed land within a built-up area. It should be given priority for housing development in accordance with the advice of PPW (paragraph 9.2.8).

*The effect of development on the safe and free flow of traffic*

3. Objectors argue that a safe vehicular access cannot be provided to the site. The Local Highway Authority is, however, satisfied that this can be provided via the improvement of an existing vehicular access which crosses a public car park. Objectors also express concern that the traffic generated by the additional dwellings would, unacceptably, add to traffic congestion on High Street which is one of the principal shopping streets of the town. The new houses would be built immediately behind this frontage, however. All the retail, business, primary education, health and employment opportunities within the town would be within a short walking distance of them. This would very significantly reduce the vehicle-based trips generated by the site.

4. The plan must, in any case, be read as a whole. Policy CH31 provides that development proposals will be approved only if a safe vehicular access can be provided and the existing road network is of sufficient standard to deal with the flow of traffic that is likely to be generated.

*The availability of necessary infrastructure*

5. Objectors refer to a waterway known as Cyt Bach which abuts the site. They argue that this poses a flood risk. The site is not within an area of flood risk identified via TAN15 and no objection to its development was received from Welsh Water or the Environment Agency. The water course of Cyt Bach is included on the Main Rivers Map of the Environment Agency. That body has informed the LPA that there is photographic evidence of past flooding. This possibility is noted in the relevant Development Brief which will ensure that the need for mitigation measures will be determined at planning application stage. It appears that detailed design measures are capable of reducing the impact of flooding on this site to an acceptable degree. In any event, the Plan must be read as a whole. Policy B28 provides that development proposals will be approved provided that they do not present an unacceptable risk of flooding.

*The effect on nature conservation interests*

6. An objector notes that the site is frequented by local wildlife. The plan must be read as a whole. Policy B20 provides that, when development is approved, planning conditions and/or obligations will be used to protect the nature conservation value of the site or to ensure that appropriate mitigation measures will be provided.

**RECOMMENDATIONS**

**I recommend:**

**(REC.1075) that the DD be modified by the acceptance of NA 354;**

**(REC.1076) that no other modification be made to the DD in response to these objections.**



**OMISSION OF HOUSING LAND ALLOCATIONS: PORTHMADOG DCA**

**ABERMARCHNAD, TANYGRISIAU TERRACE, CRICCIETH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/986/1</b>	<b>Lawson Stebbings &amp; Co.Ltd</b>	<b>Alex McGibbon</b>	<b>455</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

**Inspector's Considerations and Conclusions**

1. The objector argues that this land which is proposed to be included within the Development Boundary of the Local Centre of Criccieth, should be allocated for housing development.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.1077) that no modification be made to the DD in response to this objection.**

## CAE'R DYNI, CRICCIETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/967/1	Mr Aled Evans	John Alun Jones	454

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Criccieth and be allocated for housing development in order to meet local need. The site is an extensive area of open land across which wide views are obtained to the sea and the mountainous coastline. It is a vital element of the rural setting of the town, at a point where the first dramatic glimpses are obtained of Criccieth, the castle and the sea when approaching from the east. Its development would cause unacceptable harm to the character of the settlement, contrary to the advice of PPW (paragraph 9.3.3)

2. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the harmful effect on the setting of Criccieth, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1078) that no modification be made to the DD in response to this objection.**

## NEAR VICTORIA TERRACE, CRICCIETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/32/1	Martin Parry		456

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Criccieth and be allocated for housing development to meet a local need. The LPA agrees with the objector that the site is well connected to the built-up area and that a safe vehicular access could be provided. It is, however, concerned that the overprovision of housing land should be avoided at Criccieth.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres/Villages because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1079) that no modification be made to the DD in response to this objection.**

## LAND NEAR BRYN LLYWELYN, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA355

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/932/1	Mrs P Owen	Ron Douglas	472

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land, the majority of which is proposed at DD stage to be within the Development Boundary of the Local Centre of Penrhyndeudraeth, should be allocated for housing development in order to meet local needs. The LPA considers that all of this site should be included within the Development Boundary and seeks to secure this via NA 355.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development. There can, therefore, be no justification for an extension of the Development Boundary at this location.

### RECOMMENDATION

I recommend:

**(REC.1080) that no modification be made to the DD in response to this objection and, in particular, that NA 355 be not accepted.**

## MODEL DAIRY LAND, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1008/1	Porthmadog Hospital Trustees	William George & Son	184

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/21/1	RG & ME Jones		
B/72/1	John Rees Jones		
B/49/2	Maldwyn Lewis		

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Porthmadog and be allocated for housing development to meet a local need. It is within walking distance of a wide range of services and facilities within the town centre and should be regarded as being in a sustainable location.

2. The site is within the C1 flood risk zone. TAN15 confirms that housing development is highly vulnerable to flooding. It should be the subject of a development plan allocation only if this can be justified in accordance with the advice of section 6 of TAN15. An overriding consideration is that the land should meet the definition of previously developed land. The site does not satisfy this test. The Environment Agency has considered the assessment of flooding consequences submitted on behalf of the objector. In its letter of 31/05/06 it confirms that the consequences of a flood event cannot be acceptably managed in terms of risk to people and property.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise

land-take, and to the vulnerability of the site to flooding, I conclude that this land should not be allocated for housing development.

**RECOMMENDATION**

**I recommend:**

**(REC.1081) that no modification be made to the DD in response to this objection.**

## MOELWYN DAIRY LAND, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1217/1	B Rees Jones LI.B.		483

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Urban Centre of Porthmadog and be allocated for housing development. He contends that it is previously developed land which is not subject to flooding, and that the extension of the Penamser Industrial Estate onto land across the road to the north has changed the character of this area sufficiently to justify housing development on this site.

2. A substantial woodland separates the site from the nearest part of the consolidated built-up area of the town to the east, and a main road, (the A497) separates it from the industrial estate to the north. The site abuts open countryside on 3 sides. It is clear that the A497 road forms the definitive edge of the built-up area at this point. Development on the objector's site would, therefore, not be well integrated with and connected to the existing pattern of settlement as PPW (paragraph 9.3.1) advises.

3. For the reasons I give in the section of this report which relates to Policy CH1 I have, in any case, concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, and to the effect of development on the pattern of settlement, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

**I recommend:**

**(REC.1082) that no modification be made to the DD in response to this objection.**



**DEVELOPMENT BOUNDARIES: PORTHMADOG DCA**

**NEAR GLANABER GARAGE, BORTH Y GEST**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA348

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/220/1	Dr Rodney Hughes		136
B/49/1	Maldwyn Lewis		136
B/653/1	Porthmadog Community Council		136
B/236/1	Eirian Lewis		136
B/351/1	Raymond Hunt		136
B/726/16	Tom Brooks		136
B/838/1	DE & PM Clarke		136
B/220/3	Dr Rodney Hughes		136
B/726/19	Tom Brooks		136
B/726/18	Tom Brooks		136
B/726/17	Tom Brooks		136
B/772/1	V Brooks		136
B/213/1	Iwan Williams		136
B/607/1	Colin & Elizabeth Vicars		136
B/588/1	Glyn Williams		136
B/654/1	Glenys Owen		136

**Conditionally Withdrawn Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/685/1	Gwyn Davies		136

**Objections to Pre-Inquiry Proposed Changes**

Objection Ref No	Name of Objector	Agent	Response Ref
B/726/2023	Tom Brooks		136

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. Objectors argue that the proposed Development Boundary of the Village of Borth y Gest should be realigned to exclude the above land. The LPA agrees and,

via NA 348, proposes to exclude from the Development Boundary the part of this land referred to by the objectors which lies to the rear of Sea View Terrace. It does not, however, propose to exclude the area immediately to the north of Glanaber Garage.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the whole of the area referred to by the objectors including that immediately to the north of the garage.

3. The objectors argue that the boundary of the nearby Parc y Borth Local Nature Reserve, as shown on the Proposals Map at DD stage, should be changed to conform to the full area which is owned by the Local Authority and managed for this purpose. The area shown on the Proposals Map at DD stage is, quite properly, that which has been designated under s.21 of the National Parks and Access to the Countryside Act 1949. That area should continue to form the basis of the designation until such time as it is changed. The objectors also argue that a children's play area which lies outside the Development Boundary should be identified on the Proposals Map. Policy CH40 safeguards play areas. The supporting text confirms that this policy applies to both those areas shown on the Proposals Map (i.e. those within Development Boundaries) and those outside the built form of towns and villages. It is not, therefore, necessary to change the Proposals Map in the way the objectors seek.

## **RECOMMENDATIONS**

**I recommend:**

**(REC.1083) that the DD be modified by the acceptance of NA 348;**

**(REC.1084) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1085) that no other modification be made to the DD in response to these objections.**

## DEVELOPMENT BOUNDARY, CRICCIETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/81	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Local Centre of Criccieth should be realigned to exclude areas of undeveloped land between this and the consolidated built-up area of the settlement. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the areas referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1086) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1087) that no other modification be made to the DD in response to this objection.**

## LAND TO THE WEST OF MAES ABEREISTEDD

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/947/1	Mr Colin Flannigan	Berwyn Owen	100

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Criccieth should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1088) that no modification be made to the DD in response to this objection.**

## DEVELOPMENT BOUNDARY, GARNDOLBENMAEN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/192/1	Evan Roberts		460

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Garndolbenmaen should be realigned to include unspecified additional areas of land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1089) that no modification be made to the DD in response to this objection.**

**NEAR TY LLWYD ( 249411-344703), GARNDOLBENMAEN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/937/1</b>	<b>Ellen Wyn, Robert Owen &amp; Pritchard</b>	<b>Merfyn Jones-Evans</b>	<b>459</b>

**Note**

- The names of the objectors ought to read Ellen Wyn Pritchard, Robert Owen Pritchard and William Edward Pritchard

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objectors argue that the proposed Development Boundary for the Village of Garndolbenmaen should be realigned to include this land in order to provide for the future development of affordable housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as the objectors seek. My conclusion is reinforced by the location of the objectors' site. This is in the open countryside, far from the built-up area of the Village. Its development would promote a fragmented pattern of settlement contrary to the advice of PPW (paragraph 9.3.1).

**RECOMMENDATION**

**I recommend:**

**(REC.1090) that no modification be made to the DD in response to this objection.**

## BEHIND HEN ERDDI, LLANYSTUMDWY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1226/1	Henry & Ann Roberts		94
B/363/1	T Banks	John Sam Williams	89

### Note

- Objection B/1226/1 is responded to in LPA proof 89 not 94.
- Objection B/363/3 is dealt with in this section in addition to the above.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors variously argue that the proposed Development Boundary for the Village of Llanystumdwy should be realigned to include the whole of the field to the rear of The Feathers Public House in order to provide for the future development of affordable housing via windfall sites, or that the whole of the field should be excluded from it. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for the Development Boundary not to be further extended as one objector seeks but, instead, for it to be realigned so that it encloses only the built-up area. In any case the inclusion of land within the Development Boundary is not a necessary pre-condition for the development of affordable housing because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for this will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

2. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the whole of the land referred to by the objectors.



**RECOMMENDATIONS**

**I recommend:**

**(REC.1091) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1092) that no other modification be made to the DD in response to these objections.**

## BEHIND THE FEATHERS, LLANYSTUMDWY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/768/1	Gareth Dobson		94

### Note

- Objection B/768/1 is responded to in LPA proof 89 not 94. This objection is dealt with in the section of this report which relates to Land Behind Hen Erddi, Llanystumdwy.

## WHITE LANDS, LLANYSTUMDWY

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/82	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Llanystumdwy should be realigned to exclude areas of undeveloped land between it and the built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1093) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1094) that no other modification be made to the DD in response to this objection.**

## DEVELOPMENT BOUNDARY – MORFA BYCHAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/226/1	Gwen Williams		465

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/763/1	No Name		
B/761/1	R&J Lane		

### Note

- Objection B/719/1 is dealt with in this section of this report.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary of the Village of Morfa Bychan should be aligned so as to minimise the amount of new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would satisfy the concerns of the objectors.

**RECOMMENDATIONS**

**I recommend:**

**(REC.1095) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1096) that no other modification be made to the DD in response to these objections.**

## LAND NEAR GLAN MORFA BACH, MORFA BYCHAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/287/1	Mr & Mrs M Ransley	Charles F Jones & Son	466
B/719/1	Robert Roberts		465
B/308/1	William Hampton		466
B/735/1	D Morrow	Charles F Jones & Son	466
B/711/1	Gwilym Jones	Charles F Jones & Son	466
B/593/1	Graham & Monika Foster		466

### Supporters of Deposit Draft

Ref No	Name of Supporter	Agent	Response Ref
B/41/1	Nigel Smith		466

### Note

- The LPA confirms that objection B/719/1 is not relevant to this section of the report.

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary of the Village of Morfa Bychan should be realigned to exclude the above land. The site has been previously developed and the remains of former buildings are clearly visible. For this reason, and because of its juxtaposition to the remainder of the consolidated built-up area of the Village, it should be regarded as an integral part of the settlement and an appropriate area to be encapsulated within a Development Boundary. The objectors express concern that development here would be incompatible with the location of the site within a Landscape Conservation Area. That designation covers the whole of the Village, and does not seek to serve as an in principle obstacle to all forms of development. The objectors are concerned that development here would cause harm to the safe and free flow of traffic. The plan must be read as a whole. Policy CH31 would prevent the approval of a particular development scheme that would cause such harm. Objectors refer to a previous

refusal of planning permission for the development of this site and to the dismissal of a related appeal. A future planning application would, of course, have to be determined in accordance with the development plan then prevailing and any other material considerations.

## **RECOMMENDATION**

**I recommend:**

**(REC.1097) that no modification be made to the DD in response to these objections.**

## NEAR THE PLAYGROUND, MORFA BYCHAN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/145/1	M Stevenson		467
B/1006/1	Mr & Mrs WD Williams		467

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary of the Village of Morfa Bychan should be realigned to exclude the above land. The site is, however, part of the consolidated built-up area of the Village and is totally surrounded by development. It is, therefore, appropriate that it is encapsulated within the Development Boundary. The objectors are concerned that development on this land would erode their privacy, create harm to the safe and free flow of traffic and overload the local sewerage and drainage systems. The plan is to be read as a whole. Various DD policies provide that these matters will be taken into account when any planning application is determined.

### RECOMMENDATION

I recommend:

**(REC.1098) that no modification be made to the DD in response to these objections.**



**PART OF LAND AT ARFRYN AND BRITHWERNYDD,  
PENRHYNDEUDRAETH**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

Objection Ref No	Name of Objector	Agent	Response Ref
B/77/1	D Paul		48

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Local Centre of Penrhyndeudraeth should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1099) that no modification be made to the DD in response to this objection.**

#### 4 HIGHGATE (261145-339419), PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

##### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/309/1	Val Goslin		471

##### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

##### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Penrhyndeudraeth should be realigned to include this land. She does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

##### RECOMMENDATION

I recommend:

**(REC.1100) that no modification be made to the DD in response to this objection.**

## NEAR MAEN HOLLT, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/622/1	Morris Thomas		473

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Penrhyndeudraeth should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1101) that no modification be made to the DD in response to this objection.**

## PEN Y BWLCH, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/878/1	Balfours		470

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Penrhyndeudraeth should be realigned to include this land in order to provide for the future development of housing via windfall sites. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1102) that no modification be made to the DD in response to this objection.**

## RAILWAY LAND, PENRHYNDEUDRAETH

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1225/10	Network Rail Infrastructure Ltd		474

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Local Centre of Penrhyndeudraeth should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The site is separated from the consolidated built-up area of the Local Centre by a railway line which forms a clear and defensible limit to the settlement at this point. It is also within a designated SSSI and SAC. For these reasons it is unsuitable for development.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

### RECOMMENDATION

I recommend:

**(REC.1103) that no modification be made to the DD in response to this objection.**

## WHITE LAND, PENTREFELIN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/83	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary of the Village of Pentrefelin should be realigned to exclude undeveloped land between this and the edge of the consolidated built-up area. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify the exclusion of this land from the Development Boundary of this settlement. If my recommendation (REC.0443) is accepted this would secure that the Development Boundaries of all Local Centres and Villages are redrawn so that they follow the actual edge of the consolidated built-up area and exclude areas of open countryside. This process would exclude the land referred to by the objector.

### RECOMMENDATIONS

I recommend:

**(REC.1104) that the DD be modified in accordance with my recommendation (REC.0443);**

**(REC.1105) that no other modification be made to the DD in response to this objection.**

## WHITE LANDS, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/756/84	Environment Watch Wales & the Borders		115

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Urban Centre of Porthmadog should be realigned to exclude areas of undeveloped land between it and the edge of the consolidated built-up area. Examination of the Development Boundary of this settlement reveals, however, that this is proposed to be drawn as tightly around the built-up area as is possible, consistent with the need to secure sufficient employment land to maintain the economic viability of the town.

### RECOMMENDATION

I recommend:

**(REC.1106) that no modification be made to the DD in response to this objection.**

## LAWRENCE HOUSE, TREMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/1228/1	Carl Borum & Anja Grunert	Berwyn Owen	107

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. The objectors argue that the proposed Development Boundary for the Village of Tremadog should be realigned to include this land. They do not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. This extensive site is located at the south-eastern edge of Tremadog. Its development would significantly erode the belt of open countryside between this Village and the town of Porthmadog, contrary to the advice of PPW (paragraph 9.3.1).

2. Half of the site is within a C2 flood risk zone. TAN15 advises that plan allocations should not be made for highly vulnerable development, such as housing, in such locations. The remaining half is in the C1 flood risk zone. Allocations for housing development can proceed only if justified. In this case the site is not previously developed land. Its development cannot, therefore, be justified under the terms of TAN15.

3. The objectors refer to the recent grant of planning permission, on appeal, for the erection of an extension and a conservatory at Snowdon Lodge, within and adjacent to the proposed Development Boundary and the development of land as a car park. This latter element would be located on the objection site but is not highly vulnerable development as defined by TAN15. Nor, because of its open nature would it unacceptable erode the gap between the two settlements.

4. The purpose of Development Boundaries is to identify areas where built development is, in principle, acceptable, not to reflect patterns of land ownership. The grant of this planning permission is not a consideration which can justify a change in the line of the proposed Development Boundary which, if effected, would introduce a presumption in favour of substantial built development.

5. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the



consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

## **RECOMMENDATION**

**I recommend:**

**(REC.1107) that no modification be made to the DD in response to this objection.**

**HOSPITAL SITE: PORTHMADOG DCA**

## HOSPITAL SITE, TREMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/760/55	CCW		487

### Unconditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/969/9	Welsh Water		
B/844/45	CPRW		

### Main Issue

- Whether the DD is appropriate, having regard to the degree of commitment to the development of the site.

### Inspector's Considerations and Conclusions

1. The objector queries whether this site is suitable for the development of a community hospital. Since that time planning permission has been granted for this and construction is underway. This objection has, therefore, been overtaken by events.

### RECOMMENDATION

I recommend:

**(REC.1108) that no modification be made to the DD in response to this objection.**

**HIGHWAYS: PORTHMADOG DCA**

## GENERAL HIGHWAY ISSUES IN PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/301/1	Richard Williams		437

### Main Issue

- Whether the DD is appropriate, having regard to the necessity for the Porthmadog, Minffordd & Tremadog Bypass.

### Inspector's Considerations and Conclusions

1. The objector argues that there is no need to impose the environmental impact of this new highway on its surroundings because the congestion of the highways through Porthmadog can be resolved without it. The Porthmadog Transportation Study (2002) concluded, however, that while improvements to the public transport system would have a beneficial effect, the traffic problem in the town centre could be resolved only by the construction of a bypass to remove the traffic that does not need to visit it.

### RECOMMENDATION

I recommend:

**(REC.1109) that no modification be made to the DD in response to this objection.**

**PORTHMADOG-TREMADOG-MINFFORDD BYPASS, PORTHMADOG**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

This Section is subject to Further Proposed Changes Nos: NAP 98

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/993/5</b>	<b>Welsh Assembly Government</b>	<b>Nigel Murphy</b>	<b>323</b>
<b>B/985/12</b>	<b>Welsh Highland Railway Ltd</b>	<b>Graham Farr</b>	<b>484</b>
<b>B/993/3</b>	<b>Welsh Assembly Government</b>	<b>Nigel Murphy</b>	<b>323</b>
<b>B/993/4</b>	<b>Welsh Assembly Government</b>	<b>Nigel Murphy</b>	<b>323</b>

**Note**

- Objection B/985/12 is unconditionally withdrawn.
- Objections B/993/5, B/993/3 and B/993/4 are responded to in proof 484 not 323.

**Main Issue**

- Whether the DD is appropriate, having regard to the most recent information.

**Inspector's Considerations and Conclusions**

1. The DD, in policy CH24, provides for the safeguarding from other development of the land required for road improvement schemes. One of these is the proposed Porthmadog/Tremadog/Minffordd bypass. The route for this, shown on the Proposals Map, is that which was notified to the LPA by WAG when the DD was prepared. WAG has subsequently confirmed that the scheme is to proceed on a slightly modified alignment. I agree with the LPA that, in the interests of certainty, this should be shown on the Proposals Map. The LPA proposes a Further Proposed Change (NAP 98) to secure this. Because this proposed change in the area of land to be safeguarded from other development has not been the subject of public consultation, a full debate on its merits has not been possible via the UDP process. For this reason if the LPA wishes to pursue this it should do so via the modification procedure.

**RECOMMENDATION**

**I recommend:**

**(REC.1110) that no modification be made to the DD in response to these objections.**

**RAILWAYS: PORTHMADOG DCA**



## PROTECTED RAILWAY ROUTE, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA386

This Section is subject to Further Proposed Changes Nos: NAP94

### Objections to Deposit Draft

Objection Ref No	Name of objector	Agent	Response Ref
B/985/10	Welsh Highland Railway Ltd	Graham Farr	485
B/985/6	Welsh Highland Railway Ltd	Graham Farr	485

### Note

- Objections B/985/6 and B/985/10 have been conditionally withdrawn.

### Main Issue

- Whether the DD is appropriate, having regard to the alignment of a protected railway line.

### Inspector's Considerations and Conclusions

1. DD Policy CH21 proposes to protect the routes of former railways including the line of the Welsh Highland Railway. The objector expresses concern that the route of this is omitted from Proposals Map No 4 and that, where it is shown on Proposals Map 100 it is, in part, wrongly aligned. I agree with the LPA that, in the interests of certainty, it is necessary to show the correct alignment in order that this can be protected from development that would prevent its re-opening. The LPA proposes to secure this via NA 386 and NAP 94. Because the Further Proposed Change has not been the subject of public consultation a full debate on its merits has not been possible via the UDP process. For this reason, if the LPA wishes to pursue it, it should do so via the modification procedure.

### RECOMMENDATIONS

I recommend:

**(REC.1111) that the DD be modified by the acceptance of NA 386;**

**(REC.1112) that no other modification be made to the DD in response to these objections.**

## TRACK ALONGSIDE LLYN BACH, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/844/61	CPRW		475

### Main Issue

- Whether the DD is appropriate, having regard to the degree of certainty attaching to a development proposal.

### Inspector's Considerations and Conclusions

1. DD Policy CH21 proposes to protect the routes of former railways, including the line of the Welsh Highland Railway. The objector expresses concern that the reopening of this line will eliminate a popular footpath. This development has, however, received full planning permission and is in course of implementation. The objection has, therefore, been overtaken by events.

### RECOMMENDATION

I recommend:

**(REC.1113) that no modification be made to the DD in response to this objection.**

## THE TESCO SITE, PORTHMADOG

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/923/15	Tesco Limited	Paul Lester	427

### Main Issue

- Whether the DD is appropriate, having regard to the alignment of the Town Centre Boundary for Porthmadog.

### Inspector's Considerations and Conclusions

1. DD Policy D21 provides for the control of new retail development and extensions of existing retail premises within defined town centres. The alignment of Town Centre Boundaries is, therefore, of great importance to the retail industry. The objector expresses concern that a recently developed large supermarket at Porthmadog has been excluded from the defined town centre. The LPA refers to a retail study which identified this site as being in an edge of centre location. It argues that it is still in such a location.

2. The site does, however, directly abut the defined Town Centre Boundary on two sides. The very fact of its recent development as, by far, the largest retail outlet in Porthmadog will, together with its extensive on-site car park, have changed the pattern of retailing in the town. For many shoppers it will be the first stop and the one where the greatest bulk of purchases are made. Rather than being subsidiary to the town centre it will have assumed a pivotal role. In my view the very fact of its development, in a location so close to the established shopping area, will have changed the way in which shoppers use the centre as a whole. Because it will now function as a principal element of the town centre it should be regarded as an integral part of it in policy terms and be included within the Town Centre Boundary.

### RECOMMENDATIONS

I recommend:

**(REC.1114) that the DD be modified by the inclusion of the Tesco site within the defined Town Centre Boundary for Porthmadog;**

**(REC.1115) that no other modification be made to the DD in response to this objection.**

**SITE-SPECIFIC OBJECTIONS: TYWYN DCA**

**OMISSION OF HOUSING LAND ALLOCATIONS: TYWYN DCA**

## NEAR FAENOL ISAF, TYWYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/976/1	Bryn Owen	J H Jones	489

### Main Issue

- Whether the DD is appropriate, having regard to the omission of the above site from allocation for housing development.

### Inspector's Considerations and Conclusions

1. The objector argues that this land should be included within the Development Boundary of the Local Centre of Tywyn and be allocated for housing development to meet local needs.

2. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that no additional allocations of land for market housing are needed to satisfy the identified requirement for new house-building in the plan area as a whole, beyond those which I endorse from among those proposed by the LPA. In particular, no such additional housing land should be allocated in Local Centres because this would promote an unsustainable pattern of settlement. Having regard to the advice of PPW (paragraph 2.3.2) that planning policies and proposals should promote resource-efficient settlement patterns that minimise land-take, I conclude that this land should not be allocated for housing development.

### RECOMMENDATION

I recommend:

**(REC.1116) that no modification be made to the DD in response to this objection.**

**DEVELOPMENT BOUNDARIES: TYWYN DCA**

## PEN RHIW FIELDS, CORRIS

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA375

### Conditionally Withdrawn Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/823/1	H Sandells		453

#### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

#### Inspector's Considerations and Conclusions

1. The objector argues that the proposed Development Boundary for the Village of Corris should be realigned to include this land. He does not indicate the sort of development this change would facilitate. It would, however, provide the policy context for the favourable consideration of proposals for new house-building. The LPA agrees that the Development Boundary should be extended and proposes NA 375 to secure this.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

#### RECOMMENDATION

I recommend:

**(REC.1117) that no modification be made to the DD in response to this objection and, in particular, that NA 375 be not accepted.**



**NEAR THE BARN, FAENOL ISAF, TYWYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/987/1</b>	<b>Mr Tim Singh</b>		<b>191</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Local Centre of Tywyn should be realigned to include this land in order to provide for the future development of housing via windfall sites. The majority of the site lies within a C2 flood risk zone. TAN15 advises that housing is a highly vulnerable form of development. Plan allocations should not be made for this in such areas.

2. For the reasons I give in the section of this report which relates to affordable housing I have, in any case, concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. For the reasons I give in the section of this report which relates to Policy CH1 I have concluded that, in the interests of promoting a sustainable pattern of settlement, it is necessary to reduce the proportion of new house building that takes place in Local Centres and Villages so that it may be increased in the Sub-regional Centre and Urban Centres. I consider that these arguments justify not extending the Development Boundary of this settlement.

**RECOMMENDATION**

**I recommend:**

**(REC.1118) that no modification be made to the DD in response to this objection.**

**NEAR BRYNHYFRYD ROAD, TYWYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos:

**Objections to Deposit Draft**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/120/1</b>	<b>B Jones</b>		<b>609</b>

**Supporters of Deposit Draft**

<b>Ref No</b>	<b>Name of Supporter</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/1026/1</b>	<b>Shirley Williams</b>	<b>Suzanne Williams</b>	

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary of the Local Centre of Tywyn should be realigned to exclude the above land. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area.

2. The site is clearly an infill plot within a frontage of residential development within the consolidated built-up area of Tywyn. It is, therefore, completely appropriate that it is included within the Development Boundary. The objector expresses concern that development upon it could harm his residential amenities. The plan is to be read as a whole. Policy B22 provides that proposals that would have an unacceptable impact on the amenities of local communities will be refused.

**RECOMMENDATION**

**I recommend:**

**(REC.1119) that no modification be made to the DD in response to this objection.**

## PART OF MORFA CAMP, TYWYN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA373

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/678/1	Tywyn Community Council		84
B/230/3	JR Brooks		84

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/1465/2001	John Holland		84

### Main Issue

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

### Inspector's Considerations and Conclusions

1. Objectors argue that the proposed Development Boundary for the Local Centre of Tywyn should be realigned to include additional land in order to provide for the future development of affordable housing via windfall sites. The LPA agrees and, via NA 373, proposes to include a small area adjacent to Sandilands Road. An objector to this Pre-inquiry Proposed Change argues that this is not sufficient and that a larger area, part of the former Morfa Camp, should be included within the Development Boundary for this purpose.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. I consider that the arguments I present there are sufficient justification for this not to be further extended as both the objectors and the LPA seek. In any case such an extension is not necessary because the UDP, via Policy CH6 (as subject to NA 158), provides that proposals for affordable dwellings will be approved on suitable rural sites directly adjoining the Development Boundaries of Local Centres and Villages provided that they conform to stated criteria.

### RECOMMENDATION

I recommend:

**(REC.1120) that no modification be made to the DD in response to these objections and, in particular, that NA 373 be not accepted.**

**NEAR YSBYTY COFFA, TYWYN**

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA374

**Objections to Pre-Inquiry Proposed Changes**

<b>Objection Ref No</b>	<b>Name of Objector</b>	<b>Agent</b>	<b>Response Ref</b>
<b>B/830/2003</b>	<b>North West Wales NHS Trust</b>		<b>88</b>

**Main Issue**

- Whether the DD is appropriate, having regard to the proposed alignment of the Development Boundary

**Inspector's Considerations and Conclusions**

1. The objector argues that the proposed Development Boundary for the Local Centre of Tywyn should be realigned to include this land in order to ensure that the whole of a field, adjacent to and within the ownership of a hospital, is included within it and, therefore, has the potential to accommodate development to meet health care needs. Although there is the prospect that the Tywyn Health Centre will be moved to this hospital site and require the development of this land no particular health care scheme has yet been formulated. The LPA is concerned that, if this land was included in the Development Boundary, and the hospital expansion did not go ahead, a presumption would have been created in favour of the approval of a scheme of affordable housing for which it considers part of the site to be not suitable. For this reason it proposes, via NA 374, to exclude a further part of the field from within the Development Boundary.

2. For the reasons I give in the section of this report which relates to affordable housing I have concluded that the Development Boundaries of this category of settlement should be redrawn so that they tightly enclose the consolidated built-up area. Given the uncertainty regarding the future need for a health care centre use of the site, I consider that the arguments I present there are sufficient justification for the Development Boundary not to be extended further and, indeed, for it to be drawn more tightly as is proposed by NA 374.

**RECOMMENDATIONS**

**I recommend:**

**(REC.1121) that the DD be modified by the acceptance of NA 374;**

**(REC.1122) that no other modification be made to the DD in response to this objection.**

**HOSPITAL SITE: TYWYN DCA**

## TYWYN AND DISTRICT COMMUNITY MEMORIAL HOSPITAL, TYWYN

This Section is subject to Pre-Inquiry Proposed Changes Nos: NA374

### Objections

Objection Ref No	Name of Objector	Agent	Response Ref
B/830/1	North West Wales NHS Trust	Jan Tyrer	88

### Objections to Pre-Inquiry Proposed Changes

Objection Ref No	Name of Objector	Agent	Response Ref
B/830/2003	North West Wales NHS Trust		88

### Note

- Objections B/830/1 and B/830/2003 are dealt with in the section of this report which relates to the land near Ysbyty Coffa, Tywyn.

**HIGHWAYS: TYWYN DCA**

## GENERAL HIGHWAYS, TYWYN

This Section is subject to Pre-Inquiry Proposed Changes Nos:

### Objections to Deposit Draft

Objection Ref No	Name of Objector	Agent	Response Ref
B/230/4	JR Brooks		488

### Main Issue

- Whether the DD is appropriate, having regard to the avoidance of blight.

### Inspector's Considerations and Conclusions

1. The objector argues that additional highway schemes should be proposed to compensate for the railways which were closed in this locality in the 1960s, and for the Cambrian Coast Railway (if this was ever to close) as well as to accommodate traffic growth.

2. PPW (paragraph 8.5.2) advises that blight should be kept to a minimum by including in UDPs only firm schemes on which work will commence within the plan period, in this case up to 2016. The objector has not identified specific schemes which satisfy this test, but which have been omitted from the DD. There is, therefore, no basis on which I can conclude that the plan should be modified in this respect.

### RECOMMENDATION

**I recommend:**

**(REC.1123) that no modification be made to the DD in response to this objection.**



## **REPORT APPENDICES**

**OBJECTOR TRANSLATION TABLE**

Enw'r Gwrthwynebydd/ Cefnogwr Name of Objector/Supporter		Rhif y Sylwebydd/ Responder No.
Cymraeg/ Welsh	Saesneg/ English	
Cyngor Cymuned Aberdaron	Aberdaron Community Council	575
Clwb Golf Abersoch	Abersoch Golf Club	581
Cymdeithas Henebion	Ancient Monuments Society	604
Cyngor Cymuned Arthog	Arthog Community Council	261
Gofal Arthritis	Arthritis Care	518
Cyngor Dinas Bangor	Bangor City Council	324
Cymdeithas Ddinesig Bangor	Bangor Civic Society	317
Cyngor Cymuned Bethesda	Bethesda Community Council	759
Cymuned Bontnewydd	Bontnewydd Community	1310
Cyngor Cymuned Bontnewydd	Bontnewydd Community Council	704
Cyngor Cymuned Buan	Buan Community Council	666
Cymdeithas Ddinesig Caernarfon	Caernarfon Civic Society	567
Ymddiriedolaeth Harbwr Caernarfon	Caernarfon Harbour Trust	877
Cyngor Cymuned Clynnog Fawr	Clynnog Fawr Community Council	260
Cyngor Cefn Gwlad Cymru	Countryside Council for Wales	760
YDCW	CPRW	844
Asiantaeth yr Amgylchedd Cymru	Environment Agency Wales	776 & 777
Cwmni Rheilffyrdd Ffestiniog	Ffestiniog Railway Company	1342 & 964
Cyngor Tref Ffestiniog	Ffestiniog Town Council	687
Cyfeillion y Ddaear (Gwynedd)	Friends of the Earth (Gwynedd)	556
Cyfeillion y Ddaear (Mon & Gwynedd)	Friends of the Earth (Mon & Gwynedd)	767
Ymddiriedolaeth Archeolegol Gwynedd	Gwynedd Archaeological Trust	790
Partneriaeth Plant Gwynedd	Gwynedd Children Partnership	1231
Ffederasiwn Adeiladwyr Tai	House Builders Federation	867
Cyngor Cymuned Llanaelhaearn	Llanaelhaearn Community Council	673
Cyngor Cymuned Llanbedrog	Llanbedrog Community Council	253
Cyngor Cymuned Llanddeiniolen	Llanddeiniolen Community Council	315
Cyngoe Cymuned Llandwrog	Llandwrog Community Council	1218
Cyngor Cymuned Llandygai	Llandygai Community Council	1035
Cyngor Cymuned Llanengan	Llanengan Community Council	323
Cyngor Cymuned Llanllechid	Llanllechid Community Council	297
Cyngor Cymuned Llanllyfni	Llanllyfni Community Council	665
Cyngor Cymuned Llannor	Llannor Community Council	1661
Cyngor Cymuned Llanrug	Llanrug Community Council	681
Cyngor Cymuned Llanwnda	Llanwnda Community Council	352
Cyngor Cymuned Llanystumdwy	Llanystumdwy Community Council	384
Partneriaeth Cymunedau'n Gyntaf Maesgeirchen	Maesgeirchen Communities First Partnership	293
Trigolion Maesteg	Maesteg Residents	1036
Cymdeithas Treftadaeth Bro Porthaethwy	Menai Bridge & District Civic Society	585
Yr Ymddiriedolaeth Genedlaethol Cymru	National Trust Wales	1034

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Ymddiriedolaeth Ysbyty Cymunedol Newydd Porthmadog	New Porthmadog Community Hospital Trust	1008
Ymddiriedolaeth GIG Gogledd Orllewin Cymru	North West Wales NHS Trust	830
Partneriaeth Cymunedau'n Gyntaf Pen Llyn	Pen Llyn Communities First Partnership	555
Cyngor Tref Penrhyndeudraeth	Penrhyndeudraeth Town Council	784
Cyngor Cymuned Pentir	Pentir Community Council	250
Trigolion Penygroes	Penygroes Residents	1037
Cyngor Cymuned Pistyll	Pistyll Community Council	197
Cyngor Tref Porthmadog	Porthmadog Town Council	653
Ardalwyr Rhes Fictoria/Pengolwg	Rhes Fictoria/Pengolwg Residents	916
Awdurdod Parc Cenedlaethol Eryri	Snowdonia National Park Authority	866
Cymdeithas Eryri	Snowdonia Society	720
Prifysgol Cymru Bangor	University of Wales Bangor	1030
Undeb Amaethwyr Cymru	Farmers Union of Wales	801
Cyngor Cymuned Waunfawr	Waunfawr Community Council	1043
Llywodraeth Cynulliad Cymru	Welsh Assembly Government	993
Awdurdod Datblygu Cymru	Welsh Development Agency	911
Ymddiriedolaeth Gerddi Hanesyddol Cymru	Welsh Historic Gardens Trust	1214 & 880
Bwrdd yr Iaith Gymraeg	Welsh Language Board	783
Dwr Cymru	Welsh Water	969
WWF Cymru	WWF Wales	915
Cyngor Cymuned Y Felinheli	Y Felinheli Community Council	228

## ABBREVIATIONS LIST

AONB	Area of Outstanding Natural Beauty.
ASIDOHL	A process to enable an assessment of direct and indirect physical effects on an area's historical features.
CCW	Countryside Council for Wales.
DCA	Dependency Catchment Area.
DD	Deposit Draft of the Gwynedd Unitary Development Plan.
DEIN	Department for Enterprise, Innovation and Networks.
Dph	Dwellings per hectare.
EIA	Environmental Impact Assessment.
GDP	Gross Domestic Product.
Ha	Hectare.
LCA	Landscape Conservation Area.
LNR	Local Nature Reserve.
LPA	Local Planning Authority.
MCA	Ministerial Consultation Area.
MIPPS	Ministerial Interim Planning Policy Statement.
MPPW	Minerals Planning Policy Wales.
MTAN	Minerals Technical Advice Note
NA	Pre-inquiry Proposed Change.
NAP	Further Proposed Change.
NNR	National Nature Reserve.
NsNR	Non-statutory Nature Reserve.
PPW	Planning Policy Wales.
RSPB	Royal Society for the Protection of Birds.
RTPI	Royal Town Planning Institute.
RTS	Round Table Session.
SAC	Special Area of Conservation.
SPA	Special Protection Area.
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest.
TAN	Technical Advice Note.
UDP	Unitary Development Plan.
WAG	Welsh Assembly Government.
WDA	The former Welsh Development Agency (now DEIN).