



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

Date acknowledged:

**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name		Mark Roberts
Address		Barton Willmore [REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp in the leaflet 'Guidance about alternative sites'.

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	Policy TAI14 Housing in Sub Regional Centre and Urban Service Centers
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

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

Policy TAI 14 Housing in Sub Regional Centre and Urban Service Centres

The policy identifies proposed new allocations as well as a number of sites, which have also received planning permission for housing in the Plan period.

We note however that the distribution does not reflect the role, size and function of the settlements. This is because, Caernarfon, which is the second largest settlement by population (after Caergybi – Sub Regional Centre) of 10,000 people only has three proposed housing sites with a total of 194 homes. In contrast the settlements of Amlwch and Llangefni which are half the size of Caernarfon, are to receive twice the level of growth from new allocations or indeed taking account of existing commitments. This is evident from the table below.

	Existing Commitments	Proposed New Allocations	Total Homes	Distribution Total Homes	Distribution New Allocations	Population (2011)
Caergybi	665	307	972	29%	14%	13659
Llangefni	78	485	563	17%	22%	5116
Amlwch	63	496	559	17%	22%	3789
Bangor	73	393	466	14%	18%	16358
Caernarfon	163	194	357	11%	9%	9615
Pwllheli	45	181	226	7%	8%	4076
Blaenau Ffestiniog	10	155	165	5%	7%	4857
Porthmadoc	78	0	78	2%	0%	4185

Source:

Existing commitments from Appendix 5
Proposed new allocations from TAI14

The Plan therefore does not provide sufficient development to allow Caernarfon to be a viable, sustainable and growing settlement (Objectives of Wales Spatial Plan and Planning Policy Wales) and indeed the Vision of the Plan for Caernarfon.

The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives. Also the Policy proposals does not reflect the approach of the WSP failing Test of Soundness C3.

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

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

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

Proposed Change

We propose that additional housing of at least 400 should be directed to Caernarfon and its immediate surrounding area whilst the level of housing at Amlch and Llangefni and local service centres should be reduced by circa 400 homes.

In this respect we propose that the former Dynamex Friction Site should be identified and allocated for mixed use redevelopment including the provision of housing, alongside potential employment, public open space and areas of landscaping.

Please see the enclosed Site Specific Paper.

2dd. Is the Deposit Plan sound?

Yes No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

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

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

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

Submission of documents and evidence to the examination

Publish Inspector's report

Plan's adoption

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

Signed:



Dated:31/03/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

Completed representation forms should be returned to the Joint Planning Policy Unit at:

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is “sound”. This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of “*showing good judgement*” and “*able to be trusted*”. To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector’s job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - ‘Procedural’ (2 tests); ‘Conformity’ (4 tests); and ‘Coherence and Effectiveness’ (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the ‘consistency’ and the ‘coherence and effectiveness’ tests.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **285**

Enw / Name: **Mr Aled Evans [2646]**

Rhan: **POLISI TAI14**

Section: **POLICY TAI14**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Tai yn y canolfannau

Representation Summary:

Housing in the centres

Sylw Llawn / Full Representation:

Tai yn y canolfannau

Newid(iadau) i'r Cynllun

Gormod o dai er lles yr iaith. Bydd tai yn y canolfannau yma yn gwagio Cefn Gwlad e.e. mwy o dai ym mhwl

Change(s) to the Plan

Too much housing for the benefit of the language. Housing in these centres will empty the Countryside e.g. more houses in Pwllhelli = less people staying in Pen Llyn. Difficulties will occur in due course for schools and Ysgol Botwnnog specifically.

Profion Cadernid / Soundness Tests: vi

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **290**

Enw / Name: **Ms Bethan Roberts [2747]**

Rhan: **POLISI TAI14**

Section: **POLICY TAI14**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Gormod o dai yn mynd i'w adeiladu

Representation Summary:

Too much houses are to be built

Sylw Llawn / Full Representation:

Gormod o dai yn mynd i'w adeiladu

Newid(iadau) i'r Cynllun

Adeiladu yn ôl yr angen. Onid gwell fyddai rhoi caniatâd i bobl Gymraeg adeiladu fel y bo angen. Mi fydd na

Change(s) to the Plan

Build according to the need. Would it not be better to permit Welsh speaking people to build as needed?
There will be a worse influx than there is now, and the Welsh language will die sooner than it is now.

Profion Cadernid / Soundness Tests: vi

Davies Nia Haf (Rh-CTGC)

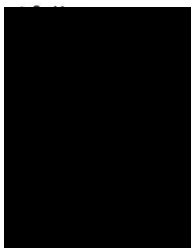
NEED TO SCAN

From: [REDACTED]
Sent: 30 March 2015 19:43
To: Polisi Cynllunio
Subject: LDP comments
Attachments: LDP.doc

The attached document are my written representations on the joint LDP for Gwynedd and Mon.

I do not wish to speak at the hearing session.

Rob Booth



Ant In general I am pleased to see that the documents refer to sustainable developments and seeks to ensure that communities are healthy and vibrant places with natural landscapes and culture.

Written Statement

Key Issues 10, on page 36, is "rationalization and centralization of education and health facilities" will not benefit communities and it will result in a decrease in facilities for the local community, especially communities with an aging population. The rationalization and centralization of health and education facilities will lead to a greater number of people requiring to travel and more car journeys. Key Issue 10 is conflicting with Key Issue 11 "Promote opportunities for people to live healthy lives and have reasonable health care, especially in a healthy population". Again Key Issue 10 for the rationalization of schools and health care is not appropriate for one of the strategic policies under PS5 on p.75 point 4 "Promote greater self-containment of centres and villages by contributing to balanced communities that are supported by sufficient services..." I want Key Issue 10 removed.

p.37 Key Issue 20 is the decline in the prosperity and vitality of town centres. This has occurred due to large supermarkets and business parks being built out of town centres. Out of town shops and offices encourage the use of cars. I suggest a policy that favours retaining shops and business in town centres and does not increase the development of business parks and supermarkets outside of towns and villages.

Page 40. It is very disappointing to see that Gwynedd and Anglesey Council have a vision that includes a new nuclear power station, the building of a new nuclear power station has great risks as we have seen in the recent disaster at Fukushima. The enormous risk to our homes, culture and tourism is great. A new power station would need many major associated developments such as housing for the construction workers and infrastructure (e.g. roads, pipes and pylons). The building of the nuclear power station will affect the Welsh culture due to the influx of temporary construction workers. Nuclear power is not sustainable, it requires toxic fuel and the waste is very problematic.

On p. 46 in table 8 on of the main elements of the strategy is economic growth. Economic growth is not sustainable. I suggest that the main strategy should seek to maintain economic status.

Housing: there should be more housing that is part of a housing association. The policies should emphasize the requirement for social and mixed housing. All housing developments should include a proportion of social housing i.e. houses that belong to housing associations.

Policy TAI10 p.146 there should be **NO** open market houses outside the development boundary.

p.156 Policy TAI14 & TAI 15 should state that developments of more than 9 houses must include at least 10% of houses that are affordable. Developments of more than 20 houses must include at least 20% of affordable houses, developments of more than 50 houses should include 30% of affordable housing/housing association houses and developments of 100 or more should include 50% of affordable/housing association houses.