

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 1645/896</p> <p>Date received: 3/3/15</p> <p>Date acknowledged:</p>
---	--	--

**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]
Postcode		[Redacted]
Telephone Number		[Redacted]
Email address		[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)	Housing Strategy
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"/>

2c. Please provide details of your representation on the Deposit Plan.

Housing Strategy

Paragraphs 6.37 to 6.45 deal with the housing strategy but it is the last element and the overall strategy section of the Plan, yet it is a fundamental basic human right, and has a major effect on the economy, society, and the environment.

In respect to the housing strategy, paragraph 6.43 confirms that approximately ½ of the housing requirement is to be provided via existing commitments and planning permissions.

However, there can be no certainty that all those permissions and commitments will be delivered. Appendix 5 confirms that there are 1,229 homes not started on sites with planning permissions or commitments in Gwynedd and 1,779 on Ynys Mon. Many planning permissions and existing commitments are not delivered for a wide range of reasons including, third party land, access, site constraints, land value, lack of market, restrictive S106 agreement requirements etc. A full schedule of these sites and their planning references and status should be provided as evidence base to support this position. Furthermore, each site should be assessed and not simply rolled forward as a commitment on an unquestioned basis.

It is also not clear what level of housing committed and proposed will be on greenfield and previously developed sites. This is significant as PPW seeks to reuse previously developed sites wherever possible in preference to greenfield sites (paragraph 4.4.3).

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.

*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.

2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
-----	--------------------------	----	-------------------------------------

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: **214**

Enw / Name: **Home Builders Federation Ltd (Mr Mark Harris) [1470]**

Rhan: **6.40**

Section: **6.40**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid ystyrir ei bod yn glir pam y dewiswyd y ffigur tai gan nad yw'n ffitio i mewn gyda'r un o'r senarios a brofwyd (pwynt a wnaed yn nogfennau'r Cyngor ei hun). At hyn, nid yw'n ymddangos fod y ffigur yn cynnwys lwfans cyfradd gwacter o 4% sy'n ofynnol i'r farchnad dai weithredu'n arferol. Mae ffigur Gwynedd hefyd yn is na'r ffigur a ragwelwyd sy'n mynd yn groes i gyngor Carl Sargeant AC sy'n cynghori mai'r pwynt cychwyn y dylai'r rhain fod. Angen eglurhad pellach ar yr opsiwn dewisol. Cynyddu'r angen tai i 7471 i adlewyrchu'r 4% graddfa'r unedau gwag. Angen egluro pam fod y ffigur tai yng Ngwynedd llai na'r ffigur rhagamcaniad tai 2011 .

Representation Summary:

It is not considered clear why the housing figure has been chosen as it does not fit with any of the scenarios tested (a point stated in the Councils own documents). The figure does also not appear to include a 4% vacancy rate allowance which is required for the normal operation of the housing market. Also the figure for Gwynedd is below the 2011 projection figure which goes against the advise of Carl Sargeant AM who advises they should be the starting point.

Further clarification required on the option chosen. Increase the housing requirement figure to 7471 to take account of the 4% vacancy rate. Explain why the Gwynedd housing requirement is below the 2011 Housing projection figure.

Sylw Llawn / Full Representation:

It is not considered clear why the housing figure has been chosen as it does not fit with any of the scenarios tested (a point stated in the Councils own documents). The figure does also not appear to include a 4% vacancy rate allowance which is required for the normal operation of the housing market. Also the figure for Gwynedd is below the 2011 projection figure which goes against the advise of Carl Sargeant AM who advises they should be the starting point.

Newid(iadau) i'r Cynllun

Angen eglurhad pellach ar yr opsiwn dewisol. Cynyddu'r angen tai i 7471 i adlewyrchu'r 4% graddfa'r uneda

Change(s) to the Plan

Further clarification required on the option chosen. Increase the housing requirement figure to 7471 to take account of the 4% vacancy rate. Explain why the Gwynedd housing requirement is below the 2011 Housing projection figure.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **117**

Enw / Name: **Home Builders Federation Ltd (Mr Mark Harris) [1470]**

Rhan: **6.41**

Section: **6.41**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ni cheir unrhyw gyfeiriad at lwfans am eiddo gwag. Mewn Cynlluniau Datblygu Lleol diweddar, derbyniwyd yn gyffredinol y dylid gwneud lwfans o 4% ar gyfer hyn oherwydd bod angen lefel benodol o eiddo gwag ar y farchnad i weithredu. Fodd bynnag, mae gwahaniaeth rhwng eiddo gwag tymor hir y mae modd i bolisi Cyngor roi sylw iddynt ac eiddo sy'n wag am gyfnod byr. Cynnwys cyfeiriad i dai gwag a chyfraddau gwagleoedd a chynyddu nifer y tai i 8189.

Representation Summary:

No reference is made to an allowance for empty properties. It is generally been accepted at recent LDP's that a 4% allowance should be made for this, as the market needs a certain level of empty properties to operate. There is however a difference between long term empty properties which can be addressed by a Council policy and short term vacancies.

Include reference to empty properties and vacancy rates and increase housing number to 8189.

Sylw Llawn / Full Representation:

No reference is made to an allowance for empty properties. It is generally been accepted at recent LDP's that a 4% allowance should be made for this, as the market needs a certain level of empty properties to operate. There is however a difference between long term empty properties which can be addressed by a Council policy and short term vacancies.

Newid(iadau) i'r Cynllun

Cynnwys cyfeiriad i dai gwag a chyfraddau gwagleoedd a chynyddu nifer y tai i 8189.

Change(s) to the Plan

Include reference to empty properties and vacancy rates and increase housing number to 8189.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **293**

Enw / Name: **Home Builders Federation Ltd (Mr Mark Harris) [1470]**

Rhan: **6.42**

Section: **6.42**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Cred y Ffederasiwn Adeiladwyr Tai y dylai mwy o'r gofynion tai ddod o Ganolfannau Isranbarthol a Chanolfannau Gwasanaethau Trefol gan y byddai hyn yn gwneud y cynllun yn fwy cynaliadwy ac ymateb i'r galw yn y farchnad. Cynyddu'r niferoedd o dai yn y ganolfan Isranbarthol a'r Canolfannau Gwasanaeth Trefol. Gellid gwneud hyn drwy ddynodi fwy o safleoedd a fydd hefyd yn rhoi'r niferoedd ychwanegol a awgrymir yn ein sylwadau ar ddarnau arall y cynllun

Representation Summary:

The HBF believe that more of the housing requirement should be provided by the Sub-regional and the Urban Service Centres. As this would make the plan more sustainable and respond to market demand. Increase the number of houses provided in the the Sub-regional and the Urban Service Centres. This can be done by allocating more sites which would also provide the additional number suggested in comments on other parts of the plan.

Sylw Llawn / Full Representation:

The HBF believe that more of the housing requirement should be provided by the Sub-regional and the Urban Service Centres. As this would make the plan more sustainable and respond to market demand.

Newid(iadau) i'r Cynllun

Cynyddu'r niferoedd o dai yn y ganolfan Isranbarthol a'r Canolfannau Gwasanaeth Trefol. Gellid gwneud hy

Change(s) to the Plan

Increase the number of houses provided in the the Sub-regional and the Urban Service Centres. This can be done by allocating more sites which would also provide the additional number suggested in comments on other parts of the plan.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **118**

Enw / Name: **Home Builders Federation Ltd (Mr Mark Harris) [1470]**

Rhan: **6.43**

Section: **6.43**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Codir pryder ynghylch y ddibyniaeth drom ar safleoedd sydd eisoes wedi cael caniatâd. Mae nifer o'r rhain wedi cael caniatâd ers tro ac efallai bod rhesymau eraill ar wahân i'r farchnad pam nad ydynt wedi cyflawni hyd yn hyn. A gynhaliwyd asesiad o'r tebygolrwydd y bydd y rhain yn cyflawni? Caiff hyn ei gefnogi gan Gyd-astudiaeth argaeledd tir ar gyfer tai i bob ardal eleni a nodwyd ganddo nifer o safleoedd oedd wedi bod i mewn er dros bum mlynedd a llawer mwy oedd wedi dangos eu bod wedi dechrau ar y safle er mwyn cadw'r caniatâd yn fyw neu adnewyddu'r caniatâd.

Representation Summary:

Concern is raised at the heavy reliance on previous consented sites. Many of these have had consent for some time and there may be reasons other than the market why these have not delivered. Has any assessment of the likely hood of these to deliver been made. This is backed up by this years JHLAS for each area which identified a number of site which had been in over 5 years and many more that had proved a start on site to keep the consent alive or just renewed the consent.

Reduce the reliance on existing consented sites and allocate more new sites which can be proved to be deliverable.

Sylw Llawn / Full Representation:

Concern is raised at the heavy reliance on previous consented sites. Many of these have had consent for some time and there may be reasons other than the market why these have not delivered. Has any assessment of the likely hood of these to deliver been made. This is backed up by this years JHLAS for each area which identified a number of site which had been in over 5 years and many more that had proved a start on site to keep the consent alive or just renewed the consent.

Newid(iadau) i'r Cynllun

Lleihau'r dibynniaeth ar safleoedd sydd efo caniatad presennol a dynodi mwy o safleoedd a all gael eu sicrh

Change(s) to the Plan

Reduce the reliance on existing consented sites and allocate more new sites which can be proved to be deliverable.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **204**

Enw / Name: **John Brinley Jones [2087]**

Rhan: **6.45**

Section: **6.45**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'n hanfodol fod perchenogion busnes sy'n creu cyflogaeth a chyfoeth yn yr ardal yn cael eu hannog i symud i mewn i'r ardal neu os oes angen cartref arnynt yn yr ardal a bod ganddynt ddarn o dir, ni ddylent orfod codi anheddau maint fforddiadwy caeth iawn gan y byddai o bosib angen cyfleusterau ychwanegol arnynt yn eu cartrefi, megis gofod swyddfa neu fannau lle gallent weithio o'r cartref. I gysidro pob cais cynllunio ar ei deilyngdod yn hytrach na chael yr un polisi sydd wrth reswm dim yn gallu cyrraedd pob gofyniad.

Representation Summary:

It is vital that business owners that create employment and wealth in the area are encouraged to move into the area or if they require a home in the area and have a plot that they should not be subjected to very stringent affordable sized dwellings since they may require additional facilities within their homes such as office space or areas where they could work from home.

To consider each planning application on merit rather than have a blanket policy that obviously can not meet all requirements.

Sylw Llawn / Full Representation:

It is vital that business owners that create employment and wealth in the area are encouraged to move into the area or if they require a home in the area and have a plot that they should not be subjected to very stringent affordable sized dwellings since they may require additional facilities within their homes such as office space or areas where they could work from home.

Newid(iadau) i'r Cynllun

I gysidro pob cais cynllunio ar ei deilyngdod yn hytrach na chael yr un polisi sydd wrth reswm dim yn gallu cy

Change(s) to the Plan

To consider each planning application on merit rather than have a blanket policy that obviously can not meet all requirements.

Profion Cadernid / Soundness Tests: None