
Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **437**

Enw / Name: **Welsh Highland Railway (Mr Graham Farr) [254]**

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Cefnogi.

Representation Summary:

Support.

Sylw Llawn / Full Representation:

Support.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

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?	
	CPRW 5 Sustainable Development
Policy number <i>(please specify)</i>	Ch 7.2 Sustainable Development esp. PCYFF1-3
Paragraph number <i>(please specify)</i>	Mainly 7.2.1-7.2.13
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

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

5. Sustainable Development

5.1 Context. We appreciate that emerging national policy sees ‘sustainable development’ as the main purpose of the land use planning system and requires the LDP to place these principles at the heart of its local strategy. We have no quarrel with the broad aims and aspirations of sustainable development. However, we question whether the proposed sustainable development policies can be applied effectively at the more local scale in the planning system. Permitted development rights are recognised for the least intrusive proposals, but the great majority of proposals where planning permission is required are for relatively small developments where it will be difficult to demonstrate sustainable development principles in any meaningful way.

5.2 We have a major concern that so much weight is to be placed on three generalised policies related to sustainable development (PCYFF1-3). We understand the intention to reduce duplication, but we think that the testing of all proposals against these overarching principles could readily become a bland ritual without much meaning in every Design and Access Statement, while at the same time planning decisions could become more arbitrary and less objective when tested against these generalised statements. The emphasis gained from explicit criteria attached to individual policies for each type of proposal will be lost. In many cases there will be no explicit policy, but only a requirement to refer to the broad sustainable development policies. ‘The baby may be thrown out with the bathwater’. The net effect risks being a less effective planning framework and poorer planning decisions.

5.3 Para 7.2.2 *'Sustainable development means making sure that people can satisfy their basic needs in the present, while ensuring that future generations can also look forward to the same quality of life'* - Should there not be an aspiration also to improve the quality of life of future generations? Add **'at least'** the same quality of life?

5.4 The interlocking and equivalent character of the three 'interconnected pillars' of sustainable development should be shown and expressed graphically as a more triangular relationship, illustrating more clearly how they inter-relate and need to be considered together.

5.5 PS5 All development proposals are required to fulfil nine objectives. We fully agree with the objectives in principle but do not see how all proposals, such as small extension to houses, could demonstrate in practice how they would contribute to all of them, especially #6 *'preserve and enhance' the quality of .. assets'* and #7 *protect and improve' the quality of the natural environment*. There is probably a need to add some qualifier e.g. *'wherever possible'*. It is noted that the introduction of objectives #10-14 does include the words *'proposals should also where appropriate:'*

5.6 PS5 #4 *'Promote greater self-containment of Centres and Villages by contributing to balanced communities that are supported by sufficient services; cultural, arts, sporting and entertainment activities; a varied range of employment opportunities; physical and social infrastructure; and a choice of modes of travel;'* This approach will clash with pressure for 'economies of scale' e.g. the current arguments about concentration of services in N Wales NHS.

5.7 PS5 #13 Improve sense by inserting 'car' and deleting 'means of' : *'Reduce the need to travel by car and encourage the opportunities for all users to travel when required as often as possible by ~~means of~~ alternative modes'.*

5.8 PS6 #1 We fully support the proposed energy hierarchy.

5.9 PCYFF 1-3 The Welsh words or other source for the derivation of the policy code letters are not clear. 'PCYFF' is a mouthful as a mnemonic for these policies and difficult to recall, unlike other policies which have useful and memorable abbreviation codes where the derivation is evident. (Perhaps PCY1-3?).

5.10 PCYFF1 #4 Housing density. While agreeing that dense settlement can be efficient in terms of land use etc. the impression on the landscape of dense estates of detached houses is alien to the traditional landscape in North Wales where settlement has not been significantly concentrated, except in 19th century quarrying areas. (See PCYFF2) If density is to be encouraged it should be through the building of terraces, rather than 'little boxes'. The terrace or even semi-detached units produce much better proportioned building blocks. The social (and economic) value of gardens should not be forgotten.

5.11 PCYFF2 #1 How practical is it to prove it *'enhances'* as well as complements? When will it be judged 'relevant'?

5.12 PCYFF2 # 5,9,11,12 Use of design jargon – ‘*Secured by design.. inclusive design.. be legible.. active frontage*’ – meanings may not be intelligible to the lay reader; re-word, provide explanatory text or glossary.

5.13 PCYFF2# 7.ii must surely mean NOT precluding the reasonable use of neighbouring land...

5.14 Para **7.2.9**. We agree that proximity of poor development should not justify poor quality new development.

5.15 Para 7.2.10. This implies some proposals will not require a Design and Access Statement - clarify which ones and what is required instead.

5.16 PCYFF3 Design and Landscaping. We agree with the aims, but have concern about the ability to monitor and enforce landscaping plans and conditions in practice.

5.17 PCYFF#1. We have been unable to locate online detailed Seascape Character Area Assessments.

5.18 PCYFF4 We support the proposed broad approach to carbon management including the priority to be given to improving energy efficiency (#1,2) and subject to the useful general conditions regarding siting and design in #3,4.

5.19 PCYFF4 #4. We would like to add ‘...carbon measures must not **(iii) ‘damage the landscape’** (giving more emphasis to the weaker statement in #3(ii) ‘*be sympathetic to the character and appearance of the landscape*’.

5.20 ARNA1 Coastal Change Management Areas

ARNA1 #8 significance of ‘(outside the indicative policy epoch up to 2025)’ ? – clarify under what circumstances these non-residential developments (beach huts, shops, camp sites, etc.) will be permitted.

5.21 ARNA1. We have been unable to locate online the CCMA maps. The maps in the Shoreline Management Plan show the location of coastal sections, but not the width of the affected management areas extending back from the coast.

5.22 ARNA1 # 3. ‘*Either cleared **or** made safe*’ (rather than ‘and’)



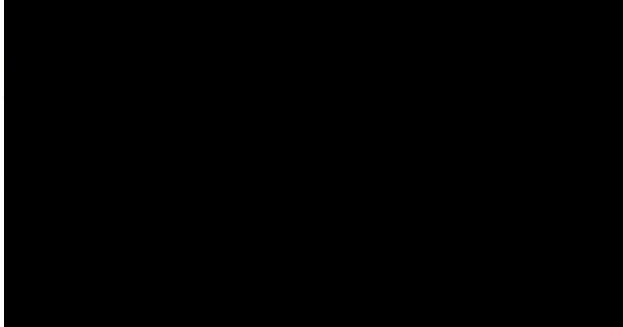
**Ministry
of Defence**

Planning Support Policy
Joint Planning Policy Unit
City of Bangor Council Offices
Ffordd Gwynedd
Bangor
LL57 1DT

**Defence
Infrastructure
Organisation**

ack. 6/3/15

Safeguarding Department
Statutory & Offshore



17 February 2015

Dear Mr Harris

Anglesey and Gwynedd Joint Local Development Plan (Joint LDP) 2011-2026

Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation.

The MODs principle concern with respect to development in Anglesey and Gwynedd is ensuring that structures, particularly tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area.

As you will be aware air traffic approaches and technical installation at MOD aerodromes are protected with statutory safeguarding zones which identify height consultation zones in the area surrounding MOD aerodromes relative to topography and distance from site.

The MOD height and technical safeguarding zones for the main operational base of RAF Valley and Mona extends over the area of Anglesey.

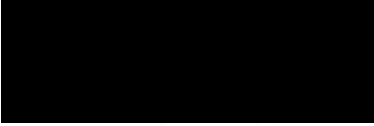
The borough is also covered by the statutory birdstrike safeguarding zone encompassing RAF Valley and Mona. In these zones the MOD reviews the development of waste management facilities; quarry restoration; wetland features as these have the potential to attract and support large and, or, flocking bird species hazardous to aircraft safety.

I can confirm the area for Gwynedd does not fall within any statutory safeguarding consultation zones. Therefore we have no comment to make on development in this area.

In relation to the Isle of Anglesey, this is covered as mentioned above by the statutory height and technical consultation zones surrounding RAF Mona and RAF Valley. On reviewing the sites proposed for development I can confirm they fall within the statutory safeguarding zones, therefore if/when this development is progressed via planning, please consult this office to ensure an accurate and effective assessment is carried out to ensure military and defence assets are not compromised.

I trust this adequately explains our position on this matter.

Yours sincerely



Louise Dale
Assistant Safeguarding Officer (Statutory & Offshore)
DIO Safeguarding

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **123**

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

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ym mhwynt 4, mae angen seilio'r gallu i godi nifer lai o dai nid yn unig ar amgylchiadau lleol ond hefyd mae angen iddo gadw mewn cof gyfyngiadau safle megis lefelau ar safleoedd neu hawddfrentiau gwasanaethau.

Representation Summary:

At point 4 the ability to build at a lower density needs to be not only based on local circumstances but also needs to take account of site constraints such as levels on sites or service easements.

Add to the wording in brackets at point 4 after local add ' or site constraints'

Sylw Llawn / Full Representation:

At point 4 the ability to build at a lower density needs to be not only based on local circumstances but also needs to take account of site constraints such as levels on sites or service easements.

Newid(iadau) i'r Cynllun

Ychwanegu 'neu gyfyngiadau safle' mewn bracedi ar ol lleol ym mhwynt 4

Change(s) to the Plan

Add to the wording in brackets at point 4 after local add ' or site constraints'

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **124**

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

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Ni ddylid defnyddio'r gair 'rhaid' gan nad yw hyn yn caniatáu'r hyblygrwydd i ystyriaethau cynllunio eraill o bwys fod yn rhan o'r broses benderfynu. Mae'r gallu hwn i ystyried ystyriaethau cynllunio eraill o bwys yn rhan sylfaenol o ddeddfwriaeth gynllunio genedlaethol. Newid y gair 'rhaid' i 'dylid' yn y pwyntiau lle defnyddir.

Representation Summary:

Should not use the word 'must' as this does not allow the flexibility for other material planning considerations to form part of the determination process. This ability to consider other material planning considerations is a fundamental part of national planning legislation. Change the word 'must' to 'should' on all the points where it is used.

Sylw Llawn / Full Representation:

Should not use the word 'must' as this does not allow the flexibility for other material planning considerations to form part of the determination process. This ability to consider other material planning considerations is a fundamental part of national planning legislation.

Newid(iadau) i'r Cynllun

Newid y gair 'rhaid' i 'dylai' ym mhob pwynt ble y'i defnyddir.

Change(s) to the Plan

Change the word 'must' to 'should' on all the points where it is used.

Profion Cadernid / Soundness Tests: None



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]
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)	Policy PCYFF1 – Development Criteria
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.
<p>Policy PCYFF1 – Development Criteria</p> <p>This policy provides a 14 part multi criteria policy, and the first and second requirements are that “A proposal must comply with all relevant policies of the Plan”, and “must comply with national planning policy and guidance.”</p> <p>This is an impossible task, the Policy does not embody the presumption in favour of sustainable development and is not positively prepared.</p> <p>Development of any kind will inevitably raise tensions and possible policy conflicts with the significant number of policies and criteria within the Plan.</p> <p>The Policy does not allow for any application of the key requirement of planning, which is the balance of often competing and conflicting objectives, i.e. the mediation of space and the creation of place.</p> <p>The approach of the policy is one which will merely turn planning applications into a tick box process of whether proposals comply with policies in the plan, rather than considering, what policies are of key relevance, what weight should be given to competing objectives and how does a proposal comply with the “presumption in favour of sustainable development of the Welsh Government” considering the social, economic and environmental themes of the Plan.</p> <p>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.</p>

*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.

The policy also duplicates and replicates other policies of the Plan relating to landscape, highways, public open space, design etc.

The policy needs to be rewritten into a positively prepared policy with a presumption in favour of sustainable development.

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: **307**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylid rhoi mwy o bwyslais ar warchod yr amgylchedd naturiol yn y polisi hwn i adlewyrchu pwysigrwydd y mater hwn trwy'r Cynllun Datblygu Lleol drwyddi draw. Ychwanegu pwynt 15: "amgylchedd naturiol"

Representation Summary:

Greater emphasis should be given to the protection of the natural environment in this policy to reflect the importance of this issue throughout the LDP. Add point 15 "natural environment".

Sylw Llawn / Full Representation:

Greater emphasis should be given to the protection of the natural environment in this policy to reflect the importance of this issue throughout the LDP

Newid(iadau) i'r Cynllun

ychwanegu pwynt 15: "amgylchedd naturiol"

Change(s) to the Plan

Add point 15: "natural environment";

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **399**

Enw / Name: **Dwr Cymru Welsh Water (Mr Dewi Griffiths) [2680]**

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae Dŵr Cymru yn cefnogi'r ddarpariaeth yn y polisi hwn y bydd caniatâd cynllunio'n cael ei wrthod pe bai'r datblygiad arfaethedig yn cael effaith andwyol ac annerbyniol ar iechyd, diogelwch neu fwynder preswylwyr tai lleol, ar ddefnyddiau eiddo a thir eraill neu ar nodweddion yr ardal leol oherwydd llygredd o draeniau.

Representation Summary:

DCWW support the provision within this policy that planning permission will be refused where the proposed development would have an unacceptable adverse impact upon the health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to drainage pollution.

Sylw Llawn / Full Representation:

DCWW support the provision within this policy that planning permission will be refused where the proposed development would have an unacceptable adverse impact upon the health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to drainage pollution.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 171

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r polisi cyffredinol yn debygol o fod wedi'i anelu at ddatblygu trefol ond nid yw'n mynd i fanylion. Nid oes cydnabyddiaeth i amgylchiadau penodol cloddio mwynau a'r angen lleoliadol i gloddio am fwynau lle ceir hyd iddynt. Awgrymu hierarchaeth ar gyfer asesu effeithiau amgylcheddol cynigion datblygu gan nad pob un ased amgylcheddol sydd â'r un gwerth. Os caiff ei ddefnyddio'n rhy gaeth yng nghyswllt safleoedd cloddio mwynau yna ceir risg o steryllu diangen.

Representation Summary:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Newid(iadau) i'r Cynllun

The policy should 'endeavour' to achieve the aims of the policy. Exceptionally some developments such as

Change(s) to the Plan

The policy should 'endeavour' to achieve the aims of the policy. Exceptionally some developments such as minerals will not be able to comply with the aspirations of the policy but those schemes should nevertheless still be permissible. Suggest start the policy with 'Where relevant all proposals should endeavour ...'; then delete points 1, 2 and 8 as they are unwieldy and unnecessary.

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **172**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI PCYFF1**

Section: **POLICY PCYFF1**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r polisi cyffredinol yn debygol o fod wedi'i anelu at ddatblygiad trefol ond nid yw'n mynd i fanylion. Nid oes cydnabyddiaeth i amgylchiadau penodol cloddio mwynau a'r angen lleoliadol i weithio mwynau lle ceir hyd iddynt. Awgrymu hierarchaeth ar gyfer asesu effeithiau amgylcheddol cynigion datblygu gan nad yw'r holl asedau amgylcheddol â'r un gwerth. Os caiff ei ddefnyddio'n rhy gaeth yng nghyswllt safleoedd cloddio mwynau yna ceir risg o steryllu diangen.

Representation Summary:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Sylw Llawn / Full Representation:

General policy likely to be aimed at urban development but does not specify. There is no recognition of the particular circumstances of mineral working and the locational need for minerals to be worked where they are found. Suggest a hierarchy for assessing environmental effects of development proposals as not all environmental assets are of the same value. If applied too rigidly to mineral extraction sites then there is a risk of unnecessary sterilisation.

Newid(iadau) i'r Cynllun

The policy should 'endeavour' to achieve the aims of the policy. Exceptionally some developments such as

Change(s) to the Plan

The policy should 'endeavour' to achieve the aims of the policy. Exceptionally some developments such as minerals will not be able to comply with the aspirations of the policy but those schemes should nevertheless still be permissible. Suggest start the policy with 'Where relevant all proposals should endeavour ...' then delete points 1, 2 and 8 as they are unwieldy and unnecessary.

Profion Cadernid / Soundness Tests: x, viii, ix

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	communities		<p>statement in support of it working in partnership with the Councils to develop an agreed ITTS for the Project, to be supported through policy TRA1.</p> <p>Generally, Horizon also considers that references in paragraphs 7.1.30 and 7.1.32 regarding "Travel Plans" should be considered; the policy requires Transport Assessments and Transport Implementation Strategies, but does not mention travel plans. How do travel plans fit with these other two concepts?</p>	<p><u>develop an appropriate scheme of transport solutions to mitigate the effects of the construction and operation of the new power station. In addition to the road upgrades referred to above such solutions are likely to include development of park and ride schemes and construction logistics centres to control the numbers and timing of traffic movements to the power station site. The promoter and the Councils will work together in partnership to develop an appropriate Integrated Traffic and Transport Strategy (ITTS) in respect of the Wylfa Newydd Project.</u></p>
21.	Chapter 7 Managing growth and Development – Sustainable Living	Policy PS5 and Explanation	<p>Horizon considers that it would be beneficial to remove some of the repetition, circularity and potential inconsistencies arising from references to other policies. For example, criteria 5, 6, 16, 10, 11, 12, 13, 14 simply cross refer to other policies which will apply to and control these matters.</p>	
22.	Chapter 7 Managing growth and Development – Sustainable	Policy PCYFF1	<p>Horizon has proposed amendments to the policy to ensure that it is meaningful and achievable.</p> <p>Horizon has the following additional</p>	<p><u>Amend Policy PCYFF1 as follows:</u></p> <p>POLICY PCYFF1: DEVELOPMENT CRITERIA</p> <p>A proposal <u>should demonstrate its compliance with:</u></p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
	Living		<p>comments:</p> <ul style="list-style-type: none"> Although it has not proposed amendments or deletions, Horizon has residual concerns that criterion 3 is more restrictive in terms development sitting than the Executive Summary (Settlement Hierarchy – para. 1.26 ff) and paragraph 6.22; the former indicates a number of circumstances in which development in open countryside will be permitted. Horizon also notes that Policy PS15 relates exclusively to housing whereas the wording of PCYFF1 implies that it relates to all forms of development, which risks creating confusion. The drafting and specificity of criterion 4 which Horizon considers is inconsistent with the drafting of the other criteria. The criteria 9 and 10 requirements dealt with elsewhere in the Plan and could be deleted here. Criterion 14 is not sufficiently clear. If by "other uses" the council means existing established uses or something that has status in a plan as an allocation, this should be made clear. If not, the policy is too open-ended for it to be 	<p>1. must comply with all relevant policies in the Plan;</p> <p>2. must comply with national planning policy and guidance.</p> <p><u>A proposal:</u></p> <p>3. Will be approved within defined development boundaries or the built form of identified clusters listed in the settlement framework set out in Strategic Policy PS15, subject to detailed material planning considerations;</p> <p>4. Should make the most efficient use of land, including achieving densities of a minimum of 30 housing units per hectare for residential development (unless there are local circumstances that dictate a lower density);</p> <p>5. Must provide appropriate amenity space to serve existing and future occupants;</p> <p>6. Should have regard to the generation, treatment and disposal of waste;</p> <p>7. Includes, where applicable, provision for the appropriate management and eradication of invasive species;</p> <p>Additionally, planning permission will be refused where the proposed development would have an unacceptable adverse impact on:</p> <p>8. Prominent public views into, out of, or across any settlement or area of open countryside;</p> <p>9. Vehicular access to and from the highway network and public transport, cycling and pedestrian infrastructure (in line with Policy TRA4);</p> <p>10. The highway network as a result of the volume and type of traffic generated from a proposal (in line with Policy TRA4);</p> <p>11. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light</p>

	JLDP Policy	Para ref	Consultation responses	Specific amendments sought
			<p>understood and applied effectively by a developer.</p> <p>More broadly, it is not clear how "acceptability" and "unacceptability" is to be assessed in the Plan.</p>	<p>pollution, or other forms of pollution or nuisance;</p> <p>12. The quality of ground or surface water;</p> <p>13. The best and most versatile agricultural land;</p> <p>14. Land safeguarded for other uses, or impairs the development and use of adjoining land.</p>
23.	Chapter 7 Managing growth and Development – Sustainable Living	Policy PCYFF4	<p>It is not clear what requirement this policy imposes on developers in relation to the "Potential Options". For example, do all options need to be considered and at least one implemented or is it permissible for no options to be implemented if evidence is presented showing that none of the options is feasible? It would be beneficial to reword this policy so that the particular obligation(s) are identified more clearly.</p>	
24.	Chapter 7 Managing growth and Development – Sustainable Living	Policy ARNA1	<p>Rather than seek for specific amendments to policy ARNA1 which seek to exclude application of this policy from the marine located associated development, Horizon proposes to rely on the Wylfa Newydd specific policies proposed below which would be the relevant policies against which to determine associated development applications. For this</p>	