



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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
	<b>CPRW 5 Sustainable Development</b>
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>	

<b>2b. Are you objecting or supporting the Deposit Plan?</b>			
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 19<sup>th</sup> 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’)

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

**5.23 Summary Sustainable Development:** We have a number of points of detail; but our principle concern is doubt that generalised sustainable development principles can be applied effectively to local planning developments of smaller scale. We fear that the weight to be given to testing all proposals against a few generalised policies, accompanied by a loss in emphasis or omission of policies for specific types of development, will result in a less effective planning framework and more arbitrary planning decisions.

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

**2dd. Is the Deposit Plan sound?**

Yes  No  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	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

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**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?

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*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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.**

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**PART 1: Contact details**

	<b>Your details/ Your client's details</b>	<b>Agent's details (if relevant)</b>
<b>Name</b>		Mark Roberts
<b>Address</b>		[REDACTED]
<b>Postcode</b>		CF10 3AL
<b>Telephone Number</b>		[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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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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)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	Policy PS5 Sustainable Development
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p><b>Policy PS5 Sustainable Development</b></p> <p>This is a 14-part policy, requiring compliance with a plethora of issues. However the approach does not embody a presumption in favour of sustainable development set out in PPW (and explained in our earlier objections). It does not allow the balancing of the benefits of development to the social, economic and indeed environmental (remediation and redevelopment of previously developed and contaminated site for example) themes with any adverse impacts. The Policy is actually a largely negatively worded policy far from the presumption in favour of Sustainable Development of the Welsh Government.</p> <p>PPW provides a clear presumption in favour of sustainable development and Policy PS5 simply does not embody any aspect of this approach.</p> <p>The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales &amp; 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 should be rewritten to provide a positive policy and 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.**

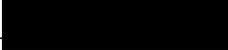
**3c. Would you like to be informed about the following (Please tick the relevant boxes)**

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31<sup>st</sup> 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.



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	<b>Your details/ Your client's details</b>	<b>Agent's details (if relevant)</b>
<b>Name</b>		Mark Roberts
<b>Address</b>		[REDACTED]
<b>Postcode</b>		CF10 3AL
<b>Telephone Number</b>		[REDACTED]
<b>Email address</b>		[REDACTED]

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Constraints Map	
Appendices (please specify)	

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

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
<p><b>Presumption in favour of Sustainable Development Policy</b></p> <p>We note that there is no policy, which expresses in overall terms and from which all policies flow that provides a presumption in favour of sustainable development.</p> <p>This is a fundamental of the approach of the Welsh Government and PPW.</p> <p>There is a sustainable development policy, Policy PS5, however this does not provide a <b>“presumption in favour of sustainable development.”</b></p> <p>This omission is a stark omission and significant oversight which goes to the heart of the policies and approach 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 &amp; 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.**

A policy providing a presumption in favour of sustainable development is required.

**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.**

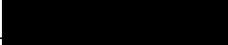
**3c. Would you like to be informed about the following (Please tick the relevant boxes)**

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

**BY EMAIL** – [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

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

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

## Test of Soundness

Test	Procedural Tests
<b>P1</b>	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
<b>P2</b>	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
<b>C1</b>	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.
<b>C2</b>	It does not have regard to national policy.
<b>C3</b>	It does not have regard to the Wales Spatial Plan.
<b>C4</b>	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
<b>CE1</b>	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.
<b>CE2</b>	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.
<b>CE3</b>	There are no clear mechanisms for implementation and monitoring.
<b>CE4</b>	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: **397**

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

Rhan: **POLISI STRATEGOL PS5**

Section: **STRATEGIC POLICY PS5**

Math / Type: **Cefnogi / Support**

## Crynodeb o'r Sylw:

Mae Dŵr Cymru'n cefnogi cynnwys y polisi hwn a'i bwyslais ar ostwng cyfaint y dŵr a ddefnyddir ac a gaiff ei wastraffu, a gostwng yr effaith ar adnoddau ac ansawdd dŵr, a gwneud y defnydd mwyaf posib o gynlluniau draenau cynaliadwy. Rydym yn llwyr gefnogi hyrwyddo datblygu cynaliadwy ac edrychwn at eich awdurdod i sicrhau bod dyluniau priodol yn cynnwys effeithlonrwydd dŵr, cadwraeth dŵr a draenio cynaliadwy er mwyn cydymffurfio â safonau uchel y Côt Cartrefi Cynaliadwy a BREEAM.

## Representation Summary:

DCWW support the inclusion of this policy and its emphasis upon reducing the amount of water used and wasted, and reducing the effect on water resources and quality, and maximising the use of sustainable drainage schemes. We fully support the promotion of sustainable development and look to your authority to ensure that appropriate designs include water efficiency, water conservation and sustainable drainage to comply with high standards of the Code for Sustainable Homes and BREEAM.

## Sylw Llawn / Full Representation:

DCWW support the inclusion of this policy and its emphasis upon reducing the amount of water used and wasted, and reducing the effect on water resources and quality, and maximising the use of sustainable drainage schemes. We fully support the promotion of sustainable development and look to your authority to ensure that appropriate designs include water efficiency, water conservation and sustainable drainage to comply with high standards of the Code for Sustainable Homes and BREEAM.

## Newid(iadau) i'r Cynllun

.

## Change(s) to the Plan

.

**Profion Cadernid / Soundness Tests:** None

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **167**

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

Rhan: **POLISI STRATEGOL PS5**

Section: **STRATEGIC POLICY PS5**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Nid yw'r polisi cyffredinol hwn yn eglur o ran yr hyn y mae'n berthnasol iddo e.e. nid pob ased tirwedd a bioamrywiaeth sydd â'r un gwerth ac ni fydd wastad yn bosib 'gwarchod a gwella' asedau. Os credir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau fel y nodir isod. Ystyried hierarchaeth i asesu effaith amgylcheddol datblygiadau arfaethedig (nid yw pob tirlun nag asedau bioamrywiaeth gyda'r un gwerth) ac yn ddi ystyriaeth i bolisiau eraill o fewn y cynllun datblygu. Ym mhwynt 3 dylid cynnwys safleoedd cyn chwareli yn niffiniad tir sydd eisoes wedi ei ddatblygu gan dynnu'r cyfeiriad tuag at ffiniau datblygu/Ym mhwynt 6 a 7 dechrau gyda "Ble'n bosibl..."

## Representation Summary:

This general policy lacks clarity as to where it applies e.g. not all landscapes and biodiversity assets are of the same value and it will not always be possible to 'protect and enhance' assets. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Suggest a hierarchy for assessing environmental effects of development proposals (not all landscapes and biodiversity assets are of the same value) and notwithstanding other policies in the development plan.

At point 3 include former quarry sites in definition of previously developed land and remove reference to development boundaries.

At points 6 and 7 start &quot;Where possible ...&quot;

## Sylw Llawn / Full Representation:

This general policy lacks clarity as to where it applies e.g. not all landscapes and biodiversity assets are of the same value and it will not always be possible to 'protect and enhance' assets. If it is considered to apply to mineral extraction sites suggest changes as set out below.

## Newid(iadau) i'r Cynllun

Ystyried hierarchaeth i asesu effaith amgylcheddol datblygiadau arfaethedig (nid yw pob tirlun nag asedau b

## Change(s) to the Plan

Suggest a hierarchy for assessing environmental effects of development proposals (not all landscapes and biodiversity assets are of the same value) and notwithstanding other policies in the development plan.

At point 3 include former quarry sites in definition of previously developed land and remove reference to development boundaries.

At points 6 and 7 start &quot;Where possible ...&quot;

Profion Cadernid / Soundness Tests: x, viii, ix

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **168**

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

Rhan: **POLISI STRATEGOL PS5**

Section: **STRATEGIC POLICY PS5**

Math / Type: **Gwrthwynebu / Object**

## Crynodeb o'r Sylw:

Nid yw'r polisi cyffredinol hwn yn eglur o ran yr hyn y mae'n berthnasol iddo e.e. nid pob ased tirwedd a bioamrywiaeth sydd â'r un gwerth ac ni fydd wastad yn bosib 'gwarchod a gwella' asedau. Os credir ei fod yn berthnasol i safleoedd cloddio mwynau, awgrymu newidiadau fel y nodir isod. Ystyried hierarchaeth i asesu effaith amgylcheddol datblygiadau arfaethedig (nid yw pob tirlun nag asedau bioamrywiaeth gyda'r un gwerth) ac yn ddi ystyriaeth i bolisiau eraill o fewn y cynllun datblygu. Ym mhwynt 3 dylid cynnwys safleoedd cyn chwareli yn niffiniad tir sydd eisoes wedi ei ddatblygu gan dynnu'r cyfeiriad tuag at ffiniau datblygu/Ym mhwynt 6 a 7 dechrau gyda "Ble'n bosibl..."

## Representation Summary:

This general policy lacks clarity as to where it applies e.g. not all landscapes and biodiversity assets are of the same value and it will not always be possible to 'protect and enhance' assets. If it is considered to apply to mineral extraction sites suggest changes as set out below.

Suggest a hierarchy for assessing environmental effects of development proposals (not all landscapes and biodiversity assets are of the same value) and notwithstanding other policies in the development plan.

At point 3 include former quarry sites in definition of previously developed land and remove reference to development boundaries.

At points 6 and 7 start &quot;Where possible ...&quot;

## Sylw Llawn / Full Representation:

This general policy lacks clarity as to where it applies e.g. not all landscapes and biodiversity assets are of the same value and it will not always be possible to 'protect and enhance' assets. If it is considered to apply to mineral extraction sites suggest changes as set out below.

## Newid(iadau) i'r Cynllun

Ystyried hierarchaeth i asesu effaith amgylcheddol datblygiadau arfaethedig (nid yw pob tirlun nag asedau b

## Change(s) to the Plan

Suggest a hierarchy for assessing environmental effects of development proposals (not all landscapes and biodiversity assets are of the same value) and notwithstanding other policies in the development plan.

At point 3 include former quarry sites in definition of previously developed land and remove reference to development boundaries.

At points 6 and 7 start &quot;Where possible ...&quot;

Profion Cadernid / Soundness Tests: x, viii, ix

# Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **111**

Enw / Name: **CPERA (Cynghorydd Elin Walker Jones) [2760]**

Rhan: **POLISI STRATEGOL PS5**

Section: **STRATEGIC POLICY PS5**

Math / Type: **Cefnogi / Support**

## Crynodeb o'r Sylw:

Dylid adeiladu ar dir llwyd ac nid ar dir gwyrdd. Argymhellir edrych ar sut i aildefnyddio safleoedd tir llwyd cyn adeiladu o'r newydd ar safleoedd tir gwyrdd, gan gynnwys dymchwel tai os nad ydynt yn ffit i bwrpas. Dylid gwneud gwell defnydd o safleoedd tir llwyd er mwyn gwarchod safleoedd tir gwyrdd a chaeau. Er enghraifft, mae ardal gyfagos i gylchfan Parc siopa Dewi Sant sy'n ddifffraith oherwydd dymchwel tai; Hendrewen; safle cornel gyferbyn ag Ysbyty Gwynedd. e.e. gellid adeiladu fflatiau wrth ymyl Parc siopa Dewi Sant efo llawr parcio l osgoi problemau llifogydd.

## Representation Summary:

Construction should occur on brownfield sites and not on greenfield sites. It is recommended to look at how to reuse brownfield sites prior to new building on greenfield sites, including demolishing housing if they are not fit for purpose. Better use should be made of brownfield sites in order to safeguard greenfield sites and fields. For example, there is an area near the Dewi Sant precinct roundabout which is deserted due to demolishing housing; Hendrewen; corner site opposite Ysbyty Gwynedd. e.g. flats could be built near the Dewi Sant precinct with a parking floor to avoid flood problems.

## Sylw Llawn / Full Representation:

Dylid adeiladu ar dir llwyd ac nid ar dir gwyrdd. Argymhellir edrych ar sut i aildefnyddio safleoedd tir llwyd cyn adeiladu o'r newydd ar safleoedd tir gwyrdd, gan gynnwys dymchwel tai os nad ydynt yn ffit i bwrpas. Dylid gwneud gwell defnydd o safleoedd tir llwyd er mwyn gwarchod safleoedd tir gwyrdd a chaeau. Er enghraifft, mae ardal gyfagos i gylchfan Parc siopa Dewi Sant sy'n ddifffraith oherwydd dymchwel tai; Hendrewen; safle cornel gyferbyn ag Ysbyty Gwynedd. e.e. gellid adeiladu fflatiau wrth ymyl Parc siopa Dewi Sant efo llawr parcio l osgoi problemau llifogydd.

## Newid(iadau) i'r Cynllun

.

## Change(s) to the Plan

.

Profion Cadernid / Soundness Tests: None

## Rhestr Wirio Sylwadau Cynllun Adnau

**Cyfeirnod Person:** 2919

**Cyfeirnod y Sylw:** 1135

**Dyddiad Derbyn:** 31/3/15

### 1) Mewnbynnu

A yw'r sylw ac atodiadau (sy'n cynnwys copi o'r ffurflen wreiddiol) wedi'i fewnbynnu i'r system JDi?  Y /  N

Dyddiad: 7/4/15 Swyddog: 

Oes angen crynhoad?  Y /  N

Ydy'r crynhoad yn gywir?  Y /  N (angen sicio fod y newid maent ei angen yn y crynhoad)

Dyddiad llythyr crynhoad sylwadau wedi'i yrru:.....

Dyddiad dderbyn ateb .....

Dyddiad addasu'r crynhoad mewn ymateb i sylwadau'r gwrthwynebydd .....

### 2) Cyfieithu

Dyddiad gyrru i'r Uned Cyfieithu: 14/5/15

Dyddiad dderbyn y cyfieithiad: .....

A yw'r cyfieithiad wedi'i fewnbynnu i'r system JDi?  Y /  N Dyddiad:

3/7/15

### 3) Cadarnhau'r Sylw

A yw'r sylw wedi ei gadarnhau ar y System JDi?  Y /  N Dyddiad: .....

Nodyn:

	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 Wyifa 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><b><u>Amend Policy PCYFF1 as follows:</u></b>  <b>POLICY PCYFF1: DEVELOPMENT CRITERIA</b>  A proposal <u>should demonstrate its compliance with:</u></p>

1135

24th March 2015

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

Our Ref: 421.02491.00032  
Your Ref:

Dear Sir / Madam

**RE: ANGLESEY AND GWYNEDD DEPOSIT JOINT LOCAL DEVELOPMENT PLAN  
2011 – 2026  
REPRESENTATIONS MADE ON BEHALF WELSH SLATE LTD**

Previously my client Welsh Slate Ltd has submitted on two separate occasions its views and representations being dated 19 June and 10 July 2013. My Client now wishes to submit further representations and comments in respect of the Deposit Local Development Plan 2011 – 2026 Initial Consultation Report Feb 2015.

It is noted and agreed that documents should refer to the Welsh Government rather than the Welsh Assembly Government.

The Initial Consultation Report at Part 1 as a general comment provides the details of the seven (7) public participation meetings where no adverse references are made as to the minerals industry in the UDP. In relation to the four (4) council members seminars the Initial Report contains only one (1) reference to minerals this being in respect of the uncertainty as to the objective stated.

Initial Report at Appendix 10 Question 1 refers to the previous statement “quarrying is coming to an end” where in response it is stated that resources will be protected and support provided for suitable extensions – an approach fully supported by Welsh Slate. The minerals industry remains a significant base element in the composition of the strategic structure not only of the UDP area but also its neighbours and the Region.

Strategic Policy 1 – whilst listing 13 objectives there is a total failure to include any reference to minerals which should be remedied regardless of any reference /s to Strategic Policy 18.

Strategic Policy ‘PS4 Development in the Countryside’ recognises that mineral extraction and waste management facilities are acceptable land uses in the countryside. Paragraph 7.57 of the Draft Consultation Response under ‘Providing Opportunities for a Flourishing Economy’ states that Gwynedd Council and its partners ‘seek to focus on sectors and activities in which the area has competitive advantages, which will yield the greatest economic benefits and which will offer the greatest diversification potential’. It makes reference to ‘the area’s abundant natural resources’ prior to listing specific sectors that provide opportunities for the area. However, it is noted that minerals are not identified within the list of sectors. As previously stated, the Company’s activities make a significant