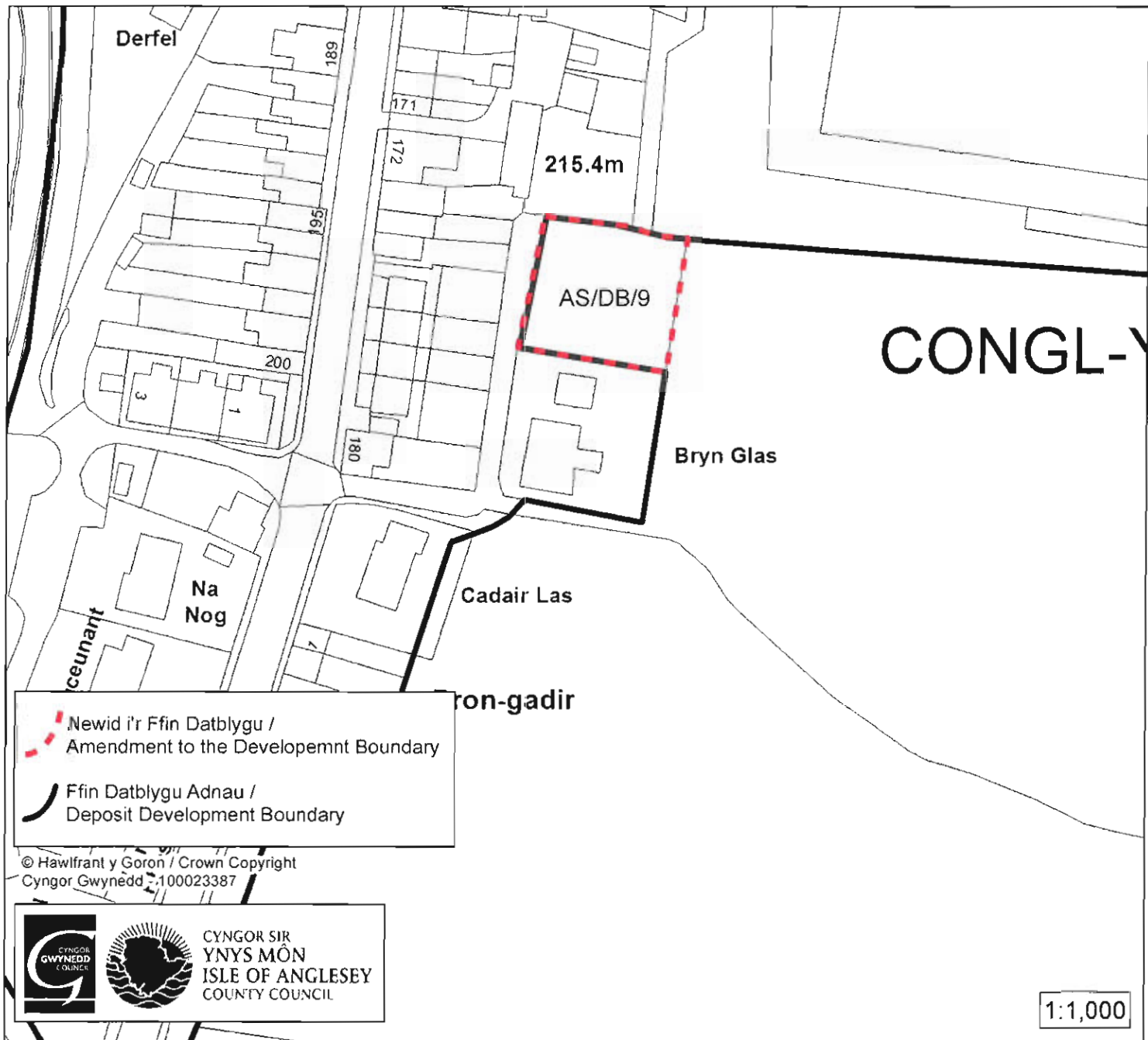


**Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn**  
**Anglesey and Gwynedd Joint Local Development Plan**  
**2011- 2026**

**COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER**



Math o Safle Amgen / Alternative Site Type: **NEWID I'R FFIN DATBLYGU / AMENDMENT TO DEVELOPMENT BOUNDARY**

Cyfeirnod / Reference: **AS/DB/9**

Enw'r Safle / Site Name: **Tir ger / Land adj Bryn Glas**

Lleoliad / Location: **Blaenau Ffestiniog**

Cyngor Cymuned / Community Council: **Ffestiniog**

Maint (ha) / Size (ha): **0.06**

AN/18/243 AS/18/9

|   |  |   |
|---|--|---|
|  |  <p>CYNGOR SIR<br/>YNYS MÔN<br/>ISLE OF ANGLESEY<br/>COUNTY COUNCIL</p> | <p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received:</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](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.

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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             | Mrs Mair Jones                      | Ms Jan Tyrer<br>Jan Tyrer Planning Consultant |
| Address          |                                     |   |
| Postcode         |                                     |   |
| Telephone Number |                                     |   |

|               |  |  |
|---------------|--|--|
| Email address |  |  |
|---------------|--|--|

### 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)

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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)                |                            |
| Paragraph number (please specify)             |                            |
| Proposals/ Inset Map (please specify ref no.) | Inset 5 Blaenau Ffestiniog |
| 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.**

The development boundary for Blaenau Ffestiniog, which currently excludes this site, should be amended to include it thereby helping to ensure that the appropriate indicative growth level for Blaenau can be achieved.

As the attached sustainability appraisal details this is a brownfield site, which relates to the existing built form of the settlement rather than the adjoining open countryside. The site is not at risk of flooding, has previously been assessed as having acceptable access and will not adversely impact on any important habitat, protected species or historical or cultural designations heritage. It is also well placed both in terms of access to local services and facilities and public transport services.

Blaenau Ffestiniog as an urban centre along with 6 other settlements falls within the second tier of the settlement hierarchy as defined in the deposit LDP where in conjunction with the sub-regional centre of Bangor, under Strategic Policy PS15 at least 55% of the Plan's housing development is to be accommodated.

Blaenau Ffestiniog has an indicative housing growth figure of 298 dwellings, of which only 7 units have been completed during the period 2011 to 2014 and with an existing land bank of only 10 units, this leaves a shortfall of 281 dwellings. Housing land allocations T24 and T25 both located at the periphery of the settlement and outside its current urban form aim to provide a further 155 dwellings leaving a shortfall of 126 dwellings to be sourced through windfall sites. Policy TAI14 details an indicative windfall figure of 118 units for Blaenau Ffestiniog, which when I queried it, has been confirmed as incorrect by the Councils' Joint Local Planning Policy Unit. The figure takes into account the 10 units in the existing land bank and therefore should read 136 units and not 118.

The urban capacity study detailed in Topic Paper 6 has calculated that Blaenau Ffestiniog has an urban capacity of 146 units, however a significant number of these, 49 units or 34% of the total figure are empty homes that it has been predicted will be brought back into use during the 15 year timespan of The Plan. As a percentage of the total urban capacity figure, this is at least double the figure for any of the other urban centres or the sub regional centre of Bangor. Whilst bringing empty housing back into use has been an accepted source of housing supply in other LDPs, the contribution it can make must be realistically calculated and evidenced based. For example in the Conwy LDP, the figure of 25 dwelling units per year for the whole plan area was used and accepted by the Inspector assessing the plan as this corresponded with the aims of the authority's empty homes programme



and was supported by the number of empty homes that had been brought back into occupation through that programme over the previous few years. However this figure was only applied on a plan wide basis as a contribution to the identified housing need and no attempt was made to break the figure down and apply it to individual settlements as this LDP has done. In this Plan a base figure of 50 empty homes being brought back into use per year for the whole of the Gwynedd Council area has been used and I understand from discussions with the Council's empty homes officers that this is reflective of the figures they have achieved since April 2011, see table below. Topic Paper 6 notes that in November 2012 the whole of the Gwynedd Council area recorded 1030 empty homes. Using the target of 50 units per year for the whole plan period this appears to address an optimistic 73% of this number, however such a calculation does not take account of two important factors. The first is that many of the short term empty homes, ie those that have been empty for more than six months but less than 2 years, return to occupation without assistance through the private housing market. The second is that particularly during the latter stages of the Plan period the empty homes strategy will be tackling new empty homes that were in occupation at the start date of the Plan. In these circumstances I would argue that these dwelling units cannot be classed as new residential units and should not therefore be contributing towards the urban capacity figures detailed in Table 28 of Topic Paper 6. Consequently once the backlog of longer term empty homes in existence at the commencement of the Plan period has been tackled it is likely that the empty homes strategy will be effectively maintaining a status quo by helping to prevent properties drop out of the housing supply for long periods of time. The Council's Empty Homes Strategy is influenced by a wide range of others factors rather than just the number and location of empty homes, therefore, to utilise the blanket calculation detailed in Topic Paper 6 to try and break down the contribution that existing empty homes can make to the housing supply in individual settlements is flawed and does not provide a credible evidence base at this level. Indeed I would argue that this distorts the true picture and the overall contribution that the empty homes strategy can make to housing supply should be incorporated into the Plan wide housing growth calculations, rather than at the more localised level. This distortion is confirmed by the following figures provided by Gwynedd's Empty Homes Unit showing the total number of residential units brought back into use within the whole of Gwynedd and how many of these were located within Bangor and Blaenau Ffestiniog:

| Year    | Total No of units in Gwynedd | No of units in Bangor | No of units in Blaenau Ffestiniog |
|---------|------------------------------|-----------------------|-----------------------------------|
| 2011/12 | 48                           | 23                    | 1                                 |
| 2012/13 | 48                           | 2                     | 6                                 |
| 2013/14 | 54                           | 2                     | 1                                 |
| 2014/15 | 66                           | 3                     | 8                                 |

This not only highlights the significant fluctuations that can occur within individual settlements each year but the wide disparity between the numbers detailed in Table 28 of Topic Paper 6 and the number of empty homes brought back into use that is being achieved. In particular in the case of Bangor, although the calculated contribution is 34 for the whole plan period 30 residential units have already been brought back into use during the first four years of the Plan and demand for such housing remains high here. This is almost double the figure achieved in Blaenau Ffestiniog, where although the number of empty properties is high the demand for housing is much lower. Yet the figures in Table 28 predict 49 homes being brought back into use in Blaenau Ffestiniog against just 34 for Bangor. Consequently it is my contention that this level of reliance on bringing empty homes back into use in Blaenau Ffestiniog is unrealistic and that its urban capacity is therefore considerably lower than the figure of 146 given.

It is accepted within the background work on calculating the housing land allocations required that the indicative windfall figures noted in policies TAI14, TAI15 and TAI16 should not reflect the total

urban capacity figures calculated and in general a 75% figure has been used. For Blaenau Ffestiniog, even if the existing total urban capacity figure of 146 is used rather than a lower figure to address the unrealistically high number of empty homes brought back into use, this would give a figure of 109 units. This is substantially below the indicative windfall provision of 126 dwellings units which has been used and which represents a much higher 86% of the urban capacity figure. This use of a higher percentage figure in Blaenau Ffestiniog is referenced at paragraph 6.16 of the Plan where it states that due to significant physical constraints in Blaenau Ffestiniog *"the Strategy proposed a relatively higher use of brownfield land and buildings within the settlement compared with other settlements."* It then goes on to state that this will be monitored and reviewed in discussion with the Snowdonia National Park and Conwy Planning Authorities as there are settlements within their administrative boundaries that may be able to contribute in the long term to providing a solution if required.

Given this background of physical constraint, it seems incongruous therefore, that where there is any area of suitable brownfield land abutting the existing development boundary for the settlement in the UDP, especially where it would round off the existing urban form, has not been included in the development boundary in the deposit LDP, especially as its inclusion was proposed as part of the LDP process. A site such as this, however small, will help to ease the acknowledged problems in achieving the target level of windfall housing provision within Blaenau Ffestiniog a second tier urban service centre in the Plan's settlement hierarchy.

Due to its limited size this site was never proposed as a housing land allocation as part of the LDP process but its inclusion within the development boundary was. In Topic Paper 1A: Assessing the Candidate Sites, under site reference SP220 the Planning Policy Comments state that due to its size of less than 0,2 hectare this site is not required as a housing allocation. This is accepted and indeed was never proposed. However these comments then go on to state that, *"acceptability can be determined through the planning application process judging the proposal against the policy/criteria found in the adopted development plan."* This I dispute, because having been placed outside of the development boundary for Blaenau Ffestiniog this automatically renders the development of the site for housing contrary to Policy TAI14. The only policy it could be considered under is Policy TAI10; Exception sites and then only if it can be shown there is a proven local need for affordable housing that cannot be delivered on a market site inside the development boundary within a reasonable timescale. For any judgement of the site's acceptability for housing development to take place the site must lie within the settlement's development boundary as required by Policy TAI14.

*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).**

This brownfield site relates to the urban fabric of the settlement rather than the adjoining open countryside and is well located both in terms of access to local services and facilities and public transport services. Its inclusion within the settlement boundary of Blaenau Ffestiniog would represent a logical rounding off of the settlement, where it would then be well placed to help contribute towards the required indicative windfall provision of housing units. Any such contributions are important because as the Plan notes this required level of provision is a challenge to achieve due to the significant physical constraints the settlement experiences.

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

The redrafting of the development boundary for Blaenau Ffestiniog indicated on Inset Map 5 to include this site.

**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 | <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"/> |

### 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.**



|   |   |
|---|---|
|   |   |
| <b>3c. Would you like to be informed about the following</b> (Please tick the relevant boxes)         |   |
| Submission of documents and evidence to the examination   | ✓ |
| Publish Inspector's report  | ✓ |
| Plan's adoption   | ✓ |
| <b>If additional documents have been provided to support your representations, please list below:</b> |   |
| Candidate site register plan for site at scale 1:2000   |   |
| Sustainability Appraisal for site with attached documents   |   |
|   |   |

|                |   |                        |
|----------------|---|------------------------|
| <b>Signed:</b> |  | <b>Dated:</b> 16/03/15 |
|----------------|---|------------------------|

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)

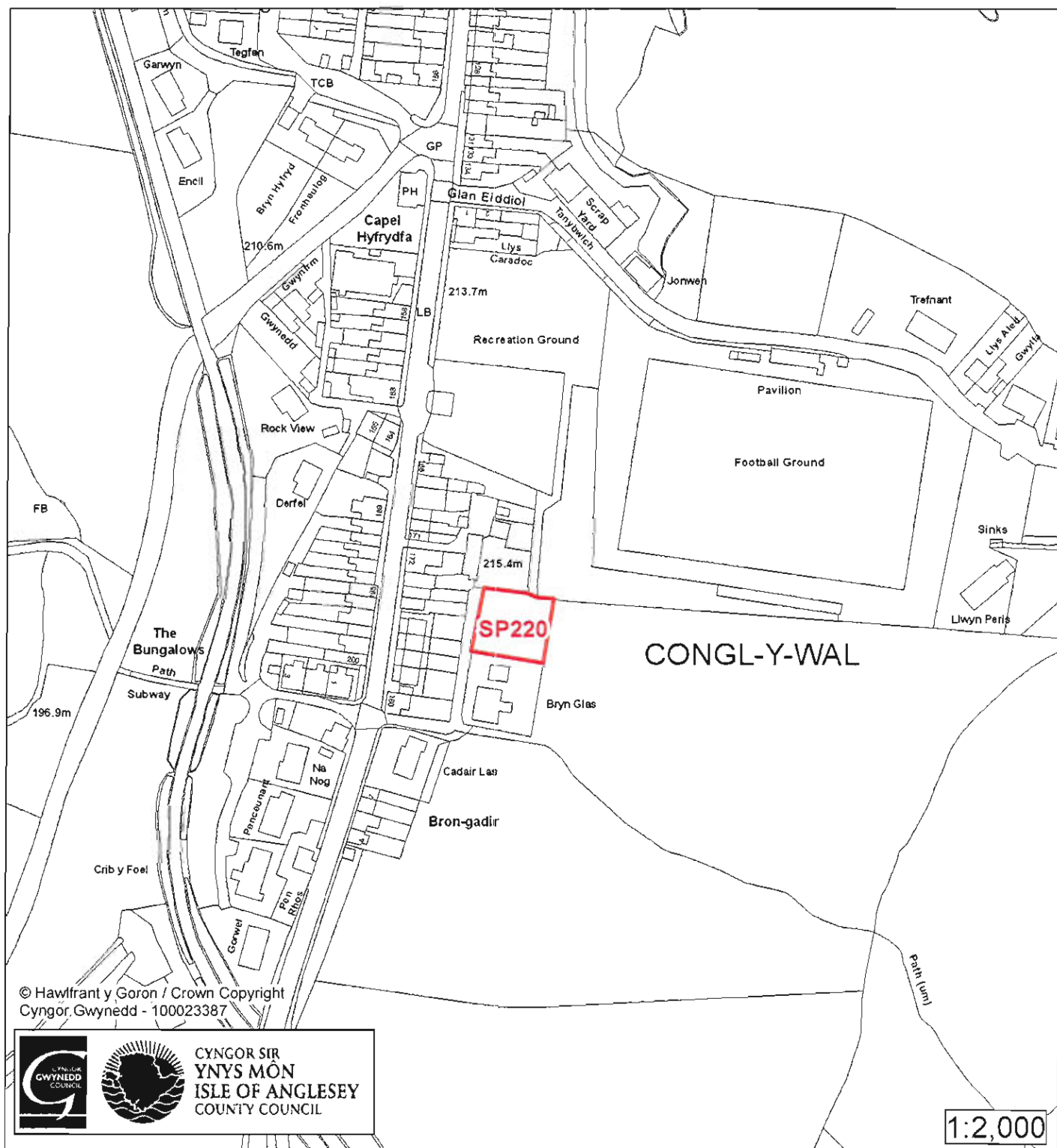
**BY POST** – By sending to: Joint Planning Policy Unit, 1<sup>st</sup> Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**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**

# Cynllun Datblygu Lleol ar y Cyd

## Joint Local Development Plan

### Cofrestr Safle Posib / Candidate Site Register



|                                    |                                |
|------------------------------------|--------------------------------|
| Cyfeirnod / Reference              | : SP220                        |
| Enw'r Safle / Site Name            | : Tir ger / Land adj Bryn Glas |
| Lleoliad / Location                | : Manod                        |
| Cyfeirnod Grid / Grid Reference    | : 705 442                      |
| Maint (ha) / Size (ha)             | : 0.06                         |
| Defnydd â Awgrymir / Suggested Use | : Tai / Housing                |

## **SUSTAINABILITY APPRAISAL BASED ON DECISION AIDING QUESTIONS NOTED IN TABLE 2.6: OF THE ANGELSEY AND GWYNEDD JLDP SUSTAINABILITY APPRAISAL REPORT:**

**SITE:** Land adjacent to Bryn Glas, Manod, Blaenau Ffestniog

**SITE AREA:** 0.06 hectare

**PREVIOUS REFERENCE:** Candidate Site Ref SP220

### **Objective 1 Maintain and Enhance biodiversity interests and connectivity:**

**Score:** + This is a brownfield site which currently forms part of the curtilage of Bryn Glas following the approval of planning consent reference number C01M/0094/03/LL on the 30/07/01 for change of use of grazing land to domestic curtilage and creation of new vehicular access. The site's development would not result in the loss of any important habitat, protected species, trees or hedgerows and it does not form part of any green corridor.

### **Objective 2 Promote community viability, cohesion, health and well being:**

**Score:** +/+ This site has no value as an open space nor is it of recreational importance and there is no risk of the land being contaminated by a previous use. The site is within 800m of several local facilities including convenience store, primary school, play area and sports facilities. All town centre facilities as well as the hospital, railway station, secondary school, doctor's surgery and dentist are within 1.5km. There are no potentially conflicting landuses that would adversely impact on the site and despite lying outside but abutted on three sides by the development boundary in the current Gwynedd UDP this site has previously been considered to be located within the built form of the settlement. This is confirmed by the content of the attached appeal decision ref no APP/Q6810/A/02/1087793 dated 27/06/02 which relates to the same area of land as this candidate site. In his decision letter the Inspector notes at paragraph 6 that *"The Council accepted that the site was within the settlement area rather than open countryside"* before highlighting the following quote from the Council's committee report about the appeal site, a small area of land to its north and Bryn Glas itself to the south, *"are within the existing built-up limits of the settlement..."* and that its use as a domestic curtilage would *"both infill" this small area of land on the periphery of the settlement and acceptably redefine the boundary of the settlement at this point*" This position and assessment of the site is reaffirmed at paragraph 8 when the Inspector states *"finally as I have already indicated, the site is within the general confines of a built up area, albeit on the periphery"* It is also worth noting that the small area of land to the north of the site and that Bryn Glas and its original curtilage are all within the development boundary of the current Gwynedd UDP and the deposit LDP. Consequently it is clear that despite the site's location outside the development boundary for the settlement in both these documents it has previously been considered as part of the built form of the settlement.

### **Objective 3 Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures:**

**Score:** 0 This site is not at risk of flooding, and as detailed above it is located within the built form of the settlement. It is close to and accessible from a public highway via a private access road and the junction of the access road with the public highway is capable of accommodating the limited amount of additional traffic any further development of this site would generate. This is evidenced by the consultation responses received from the Council's Transportation Unit and the Transportation Directorate to an application for full planning permission for the erection of a single two storey dwelling on the site back in 2009 under planning reference C09M/0103/03/LL. The attached Council's committee report for this application confirms that the Council's Transportation Unit raised no objection and that the Transportation Directorate stated that *"The Assembly do not propose guidance on the proposal but note that the existing narrow road would not be likely to support a significant increase in traffic."* The future development of this site

provides the opportunity of providing a formal turning area at the end of the existing lane that would benefit existing as well as future users.

**Objective 4 Conserve, promote and enhance the Welsh language:**

**Score: 0** As detailed above the site is within 1.5km of the wide range of facilities available within the settlement and is within 800m of a convenience store, primary school, play area, sports facilities and 100m from a bus stop on a well serviced public transport route.

**Objective 5 Conserve, promote and enhance cultural resources and historic heritage assets:**

**Score: 0** This site is not affected by any geological, historical or cultural designations and its relatively well screened location mean that it would not adversely impact upon any important views or vistas or on the character of the settlement.

**Objective 6 Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities:**

**Score: 0** As detailed above the nearby highway system and junctions are able to cope with the potential development of this site and the site is well placed in terms of access to public transport and local facilities. Connections to all utilities are within 100m of the site, gas, water sewerage and telecommunications facilities are available in the access road fronting the site and an electricity connection can be made on the northern boundary of the site. There are no conflicting land uses

**Objective 7 Provide good quality housing, including affordable housing that meets local needs:**

**Score: +** See response to objective 6 above for comments on highway system and connections to utilities and objective 2 above for access to local facilities. Development of this site will help deliver adaptable housing that addresses the individual needs of the community

**Objective 8 Value, conserve and enhance the plan area's rural landscapes and urban townscapes:**

**Score: +** See response to Objective 5 above Also as this site forms part of the curtilage of Bryn Glas this is a brown field site.

**Objective 9 Use land and mineral assets effectively and promote mechanisms for waste minimisation, re-use and recycling:**

**Score: +** As the site forms part of the curtilage of Bryn Glas it is a brownfield site and there would be no loss of the best and most versatile agricultural land. There is no known risk of contamination from previous uses and as the site is within a predominantly residential area there are no potential conflicting land uses.

**Objective 10 Promote and enhance good transport links to support the community and the economy**

**Score: +** Site is within 100m of a well serviced bus stop and the route is not obstructed or unduly steep. As detailed in objective 3 above site accessibility and the standards of capacity of relevant road junctions have previously been confirmed as acceptable for the restricted amount of development this site would be able to accommodate. The site is within 250m of an existing recreational route.

**Objective 11 Safeguard water quality, manage water resources sustainability and minimize flood risk:**

**Score: 0** The site is not within an area at risk of flooding or within a groundwater or surface water protection area.



## Penderfyniad ar yr apêl

Ymweliad â safle a wnaed ar 20/05/02

## Appeal Decision

Site visit made on 20/05/02

gan/by David Wilks BSc(Hons) DipEM MRTPI MCMI FRSA

Arolygydd penodwyd gan Cynulliad  
Cenedlaethol Cymru

an Inspector appointed by the National  
Assembly for Wales

Dyddiad/Date 27-06-2002

Appeal Ref: APP/Q6810/A/02/1087793

Site address: Land adjoining Bryn Glas, Manod, Blaenau Ffestiniog.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a grant of planning permission subject to conditions.
- The appeal is made by Mr T D Hunter against the decision of Gwynedd County Council.
- The application (Ref. C01M/0094/03/LL), dated 30 July 2001, was granted planning permission by the Council on 8 October 2001 subject to conditions.
- The development permitted is the change of use of grazing land to domestic curtilage and creation of new vehicular access.
- The conditions in dispute are Nos 2, 3 and 5 which state, in summary, that:
  2. Notwithstanding the provisions of the GPDO 1995 no hard surface shall be provided on the land.
  3. Notwithstanding the provisions of the GPDO 1995 no buildings, structures or means of enclosure shall be erected on the site.
  5. No goods, plant, materials or vehicle parts shall be stored on the site, and the site shall not be used for the parking of vehicles, trailers and containers nor for the maintenance and repair of vehicles or in conjunction with any business or commercial use.
- The reason given for the conditions is "In the interests of the visual amenities of the area."

**Summary of Decision: The appeal is allowed and the planning permission varied, as set out in the Formal Decision below.**

### Procedural matter.

1. I have taken the date of the planning application to be as stated on the appeal form and noted in the third bullet point above, namely 30 July 2001. This is also the date given in the Committee report on the application. However, the application was stated to be registered on 19 July 2001 on the decision notice and the application forms submitted with the appeal are dated 9 August 2000.
2. The original documents did not indicate which conditions were the subject of the appeal. In a letter of 19 May 2002, the appellant confirmed that his concerns particularly related to conditions 2, 3 and 5.

### Site and surroundings.

3. The site lies on the edge of the Manod residential area at the southern end of Blaenau Ffestiniog, just to the east of the A470 Manod Road. It is approached off that road along a short narrow lane which ends by the appellant's dwelling, Bryn Glas. A roughly surfaced track then extends to the north at right angles to the lane, passing between Bryn Glas and the appeal site beyond on its eastern side and the rear of dwellings at 174 – 180 Manod Road to

the west. The appeal site is a small grass enclosure with a container sited near one corner. To the north is another small enclosure containing vehicles, building equipment and old furniture; and the edge of a football ground lies to the north-east. To the east the ground rises into open grazing land. To the south is a garage compound within the existing curtilage of Bryn Glas.

#### Main issue.

4. The main issue is whether deletion of the conditions would result in an unacceptable impact on the amenity of the locality.

#### Analysis and Conclusions.

5. I have noted that in his original planning application the appellant made it clear that he wished to provide a small hardstanding enclosure on the site on which to keep 2 vintage tractors and a trailer. The Council then proceeded to approve the application, but at the same time imposed conditions which effectively prevented the appellant from carrying out the particular development which he must have thought he applied for. I can, therefore, understand his concern that some of the conditions are unduly onerous and unreasonable.
6. In approving the application the Council accepted that the site was within the settlement area rather than open countryside. Their Committee report states that the appeal site, the small enclosure to the north, and Bryn Glas to the south *"are within the existing built-up limits of the settlement ..."* and that the use as domestic curtilage would *"both 'infill' this small area of land on the periphery of the settlement and acceptably redefine the boundary of the settlement at this point."* The Council say that the reason for imposing the conditions was to protect visual amenity and they refer to the number of vehicles already kept at Bryn Glas which they infer exceeds a level which could be claimed to be ancillary to the domestic use of that property. However, they admit that they have no information that a business use is in operation from the dwelling and they do not actually claim that the appellant is engaged in activities which are not incidental to the enjoyment of his dwelling as such. If that had not been the case then it must be assumed the Council may well have refused permission and I note that they took the various objections and allegations of local residents into account at the application stage.
7. Having received approval for the change of use to domestic curtilage I consider the appellant must be allowed a reasonable amount of freedom to use the land for purposes incidental to the enjoyment of his dwelling, including a genuine hobby activity which falls within that limitation. A further point is that the Council have not suggested that nearby dwellings are affected by noise or disturbance or traffic using the track. I have also noted that there is an existing hardstanding behind 174 Manod Road on which a car was parked at the time of my site visit. This is closer to the rear of dwellings than the appeal site.
8. With regard to visual amenity, I have the following comments. First, the Manod Road dwellings are at a lower level than the appeal site and are largely screened from it by outbuildings and vegetation, including the high hawthorn hedge along part of the site frontage. Second, the small enclosure to the north of the site is an eyesore which the Council seem to equate with their concern about the appeal site, but do not say if they have done anything to improve its appearance such as serving a Section 215 Notice. As it is, I consider the land and curtilages to the north between the site and Gwlfa Garage are all somewhat unkempt and this appears to be an accepted standard for that area. It seems to me that if the appeal site is used as approved and as intended by the appellant, then there is no reason to fear that it would itself become unsightly. Third, in views from the north-east beyond the



football ground the lower part of the site is not prominent and to the east it is screened from a distance by the sloping topography. Finally, as I have already indicated, the site is within the general confines of a built-up area, albeit on its periphery. In those circumstances and having regard to the presence of various buildings, enclosures, hard surfaces and vehicles which are commonplace in the surrounding locality, I consider it would be unreasonable to treat the appellant differently and I do not believe the visual amenity of the area would be harmed. If he does use the land for business purposes or exceeds the limitation on incidental use of the curtilage then the Council have powers to control such activities, as planning permission would be required.

9. Turning to the conditions themselves, as paragraphs 86 – 88 of Welsh Office Circular 35/95 point out, conditions to control permitted development rights should only be imposed in exceptional circumstances. I can see no such circumstances which provide a basis to restrict the provision of a hardstanding, a building, or an enclosure on the land; or the parking of the few vehicles which the appellant wishes to keep there. Accordingly, I shall delete conditions 2 and 3, as the development should have no more impact than would be expected in any other settlement area where the owner of property might possess several vehicles for personal use. With regard to condition 5, I shall vary it to allow for the parking of 2 vehicles and a trailer as requested by the appellant, but confine it to that number as I believe that it is reasonable in the interests of visual amenity to avoid a potential clutter of vehicles and associated storage on the site. I shall also retain the restriction on vehicle maintenance and repair on the site as this could be undertaken in the appellant's existing garage.
10. Although condition 4 has not been appealed I shall vary it to incorporate a clause about submission of a landscaping scheme, including the stone walling referred to in the current condition. This will not prejudice or come as a surprise to the appellant as he proposed areas of landscaping at the application stage in the plan accompanying his letter to the Council of 23 August 2001. The walls and landscaping will be of considerable benefit to the site's appearance in the locality and enhance the boundary areas, especially if any development is carefully sited in the lower part of the site close to the existing hawthorn screening. Any landscaping might need to take account of the proposed footpath at the north-east corner of the site referred to by the Council.
11. Subject to the foregoing conditions and having regard to all other matters raised, I do not consider any adverse effect on visual amenity would be caused and that the appeal should succeed. It should be noted that a new permission is not created, but I shall vary the existing permission by deleting some of the disputed conditions and substituting others.

#### Formal Decision.

12. In exercise of the powers transferred to me, I allow the appeal and vary the planning permission No. C01M/0094/03/LL for the change of use from grazing land to domestic curtilage and creation of new vehicular access on land adjoining Bryn Glas, Manod, Blaneau Ffestiniog granted on 8 October 2001 by the Gwynedd County Council, by deleting conditions Nos. 2, 3, 4 and 5 and substituting for conditions 4 and 5 the following conditions:
  - 4) Full details of both hard and soft landscape works shall be submitted to and approved in writing by the local planning authority which shall include boundary tree planting and the retention of the hawthorn hedge on the western boundary. Except where it is necessary to provide the new means of access into the site and to allow any approved public pedestrian access through any part of the site, dry stone walls shall be erected along both the eastern and western boundaries, the details of the height, construction and location of which shall first be submitted to and approved in writing by the local planning authority. The stone walling shall be erected before the use hereby approved commences and the soft landscape works as approved in writing shall be undertaken

No: 1

|   |  |  |            |
|---|--|--|------------|
| <b>Rhif y Cais:</b><br><i>Application Number:</i> | C09M/0103/03/LL  | <b>Dyddiad Cofrestru:</b><br><i>Date Registered:</i>                           | 27/10/2009 |
| <b>Math y Cais:</b><br><i>Application Type:</i>   | LLAWN -<br>CYNLLUNIO/FULL -<br>PLANNING  | <b>Diwedd Cyfnod<br/>Ymgynghori:</b><br><i>End of Consultation<br/>Period:</i> | 26/11/2009 |
| <b>Cymuned:</b><br><i>Community:</i>              | FFESTINIOG   | <b>Ward:</b><br><i>Ward:</i>   | TEIGL      |
| <b>Bwriad:</b><br><i>Proposal:</i>                | CODI ANNEDD DEULAWR AR WAHAN / ERECTION OF DETACHED TWO<br>STOREY DWELLING                               |  |            |
| <b>Lleoliad:</b><br><i>Location:</i>              | LLAIN GER BRYN GLAS / PLOT ADJ TO BRYN GLAS, CONGL Y WAL, MANOD,<br>BLAENAU FFESTINIOG, GWYNEDD, LL414AR |  |            |

**Summary of recommendation:** Refuse the application.

**Description:**

This is a full application to erect a two-storey detached dwelling with 4 bedrooms and an integral garage measuring 16.8 metres long and 10.5 metres wide. The total floor area extends to 266 m<sup>2</sup> square. The site is situated at the rear of a row of existing houses served by a single narrow and steep track linked from the A470 highway nearby, and is on land that is outside the town's development boundary on the southern outskirts of Manod, Blaenau Ffestiniog.

The site of the new building forms part of the existing garden of Bryn Glas dwelling situated on the southern side. The external walls of the proposed building will be covered with natural stonework, pebbledash, windows and doors in white plastic and slate on the pitched roofs. It is proposed to create a parking and turning area for three vehicles and erect a stone wall on the southern boundary.

The existing site has been levelled on the western access and east there are mounds of stone and grassland that elevates steeply where there are agricultural fields. There are stone walls on three boundaries with an access gate for vehicles on the western boundary. North are gardens and a football pitch and east is a narrow uneven single track as well as the back of dwellings.

**Relevant Policies:**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 3.1.2 Planning Policy Wales emphasise that planning applications should be determined in accordance with the Unitary Development Plan, unless material planning considerations state otherwise. Planning considerations include National Planning Policy and the Unitary Development Plan.

**Gwynedd Unitary Development Plan 2009:**

Policy B22 – Building Design – Promote the design of good buildings by ensuring that proposals conform to a series of criteria aimed at protecting the recognised features and character of the local landscape and environment.

In 1997 an outline application to erect a dwelling on the site of the current application was refused. In 2001 approval was given for grazing land to be changed into a domestic curtilage and create a new vehicular access and later on approval was given on appeal in June 2002 to remove 4 conditions and exchange those for 2 conditions concerning landscaping details together with enabling the owner to park up to 2 vehicles and 1 trailer for supplementary use to the dwelling. In August 2009 an application was withdrawn to erect a detached two storey dwelling on site

**Consultations:**

|                               |   |
|-------------------------------|---|
| Community/Town Council        | No objection  |
| Transportation Unit:          | No objection.   |
| Environment Agency:           | No observations to propose for the application.   |
| Welsh Water:                  | Propose standard conditions.  |
| Environmental Health Section: | Not received.   |
| Transportation Directorate:   | State that the Assembly do not propose guidance on the proposal but note that the existing narrow road would not be likely to support a significant increase in traffic.  |
| Tree Officer:                 | Not received.   |
| Policy Unit:                  | Location outside the development boundary of Blaenau Ffestiniog and as no justification was submitted regarding the need for an agricultural/forestry, rural industry worker then the proposal does not conform with the requirements of Policies C1 and CH9 of the Unitary Plan nor national planning policies and guidance.   |
| Public Consultation:          | 5 letters of objection and 5 letters of support were received during the consultation period. The objections are based on – concern regarding impairing on the privacy of nearby houses, state that the access track is unsuitable for an increase in traffic with the existing use causing a squabble between neighbours, the road is narrow and the boundary walls have been damaged as a result; concern regarding the increase in use during the development time by heavy plant; state that part of the track is a public path and there would be concern regarding the safety of children and track users as a result of the development; concern that the access is narrow for emergency services; state that consent for a house was refused previously as the road was sub-standard. |

## Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **420**

Enw / Name: **Cyngor Tref Ffestiniog (Mrs Ann Coxon) [2940]**

Rhan: **POLISI TAI14, T24 - Cyn Cae Chwarae, Blaenau Ffestiniog**

Section: **POLICY TAI14, T24 - Former Playning Fields, Blaenau ffestiniog**

Math / Type: **Cefnogi / Support**

### Crynodeb o'r Sylw:

Dynodi Y Ddôl, hen safle'r Clwb Rygbi ar gyfer tai. Mae'n bwysig iawn i nodi fod y safle hwn ar y gorlifdir. Mae'r mapiau a wnaeth hen Asiantaeth yr Amgylchedd am peryglon llifogydd yn cadarnhau hyn. Felly, os caiff tai eu codi ar y safle, fe fydd rhaid i dylunio nhw'n arbennig, hwyrach eu codi nhw ar stilts. Fe fyddai gwneud tai arferol yn golygu gorfodi preswylwyr y dyfodol i ddioddef llifogydd dro ar ôl tro.

### Representation Summary:

To designate Y Ddôl, the old site of the Rugby Club, for housing. It is very important to note that this site lies on floodplain. The maps that were created by the old Environmental Agency about flood risks confirm this. Therefore, if houses are built on that site, they would have to be specially designed, perhaps even raised on stilts. Building normal houses would mean forcing future residents to suffer floods time after time.

### Sylw Llawn / Full Representation:

Dynodi Y Ddôl, hen safle'r Clwb Rygbi ar gyfer tai. Mae'n bwysig iawn i nodi fod y safle hwn ar y gorlifdir. Mae'r mapiau a wnaeth hen Asiantaeth yr Amgylchedd am peryglon llifogydd yn cadarnhau hyn. Felly, os caiff tai eu codi ar y safle, fe fydd rhaid i dylunio nhw'n arbennig, hwyrach eu codi nhw ar stilts. Fe fyddai gwneud tai arferol yn golygu gorfodi preswylwyr y dyfodol i ddioddef llifogydd dro ar ôl tro.

### Newid(iadau) i'r Cynllun

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### Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

|   |  |  |
|---|--|--|
|  |  <p>CYNGOR SIR<br/>YNYS MÔN<br/>ISLE OF ANGLESEY<br/>COUNTY COUNCIL</p> | <p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15<br/>edw</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](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.

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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             | [REDACTED]                          |                               |
| Address          | WELSH WATER<br>[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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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)

Enwan saifwood

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

|   |                                       |
|---|---------------------------------------|
| Policy number (please specify)                | TAI 14 Housing in Sub regional centre |
| Paragraph number (please specify)             | + Urban service centre                |
| Proposals/ Inset Map (please specify ref no.) |                                       |
| Constraints Map                               |                                       |
| Appendices (please specify)                   |                                       |

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

|           |   |            |   |
|-----------|---|------------|---|
| Objecting | ┐ | Supporting | ┐ |
|-----------|---|------------|---|

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

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 ☐ 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 type="checkbox"/> | 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. | <input checked="" type="checkbox"/> |
| I want to speak at a hearing session.   | <input type="checkbox"/>            |

**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.**

|              |
|--------------|
| <br><br><br> |
|--------------|

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

|   |                                     |
|---|-------------------------------------|
| Submission of documents and evidence to the examination | <input checked="" type="checkbox"/> |
| Publish Inspector's report                              | <input checked="" type="checkbox"/> |
| Plan's adoption   | <input checked="" type="checkbox"/> |

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

|              |
|--------------|
| <br><br><br> |
|--------------|

|   |                |
|---|----------------|
| Signed:  | Dated: 31/3/15 |
|---|----------------|

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.  |
|      | <b>Consistency Tests</b>   |
| 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.  |
|      | <b>Coherence and Effectiveness Tests</b>   |
| 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.



- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Off-site sewers required to connect to the public sewerage network can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### **T22 Land near Bro Tudur, Llangefni**

- Potential developers need to be aware that this site is crossed by a water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.
- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991
- Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### **T23 Land near Coleg Menai, Llangefni**

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990. A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Off-site sewers required to connect to the public sewerage network can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- Llangefni Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

#### **T24 Former Playing Fields, Blaenau Ffestiniog**

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.





1594

- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1595

**T25 Land at Congl Y Wal, Blaenau Ffestiniog**

- Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.
- The foul flows would lead to Tanrhos Manod Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed. Should off-site sewers be required these can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1596

**T26 Former Hendre School, Caernarfon**

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1597

**T27 To the rear of Maes Gwynedd, Caernarfon**

- A water supply can be provided to serve this site.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1598

1599

1600

1601

**T28 Cae Phillips Road, Caernarfon**

- This site has planning permission as such we have no further comment to make.

**T29 Land near Lon Caernarfon, Pwllheli**

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Pwllheli Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

1602

1603



|   |   |  |  |
|---|---|--|--|
|  |  | <p>CYNGOR SIR<br/>YNYS MÔN<br/>ISLE OF ANGLESEY<br/>COUNTY COUNCIL</p> | <p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15<br/>edw</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](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.

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://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             | [REDACTED]                          |                               |
| Address          | WELSH WATER<br>[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](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)

Ennam saflwoodd

|  |                                      |
|--|--------------------------------------|
| <b>2a. Which part of the Deposit Plan are you commenting on?</b> |                                      |
| Policy number (please specify)                                   | TA114 Housily in Sub regional centre |
| Paragraph number (please specify)                                | + Urban service centre               |
| 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 type="checkbox"/> | Supporting | <input type="checkbox"/> |

|   |
|---|
| <b>2c. Please provide details of your representation on the Deposit Plan.</b>   |
| <p style="text-align: right; margin-top: 20px;">Please use additional sheet if necessary.<br/>Please state how many additional sheets have been used.....</p> |

**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 ☐ 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 type="checkbox"/> | 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. | <input checked="" type="checkbox"/> |
| I want to speak at a hearing session.   | <input type="checkbox"/>            |

**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.**

|              |
|--------------|
| <br><br><br> |
|--------------|

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

|   |                                     |
|---|-------------------------------------|
| Submission of documents and evidence to the examination | <input checked="" type="checkbox"/> |
| Publish Inspector's report                              | <input checked="" type="checkbox"/> |
| Plan's adoption   | <input checked="" type="checkbox"/> |

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

|              |
|--------------|
| <br><br><br> |
|--------------|

|   |                |
|---|----------------|
| Signed:  | Dated: 31/3/15 |
|---|----------------|

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.  |
|      | <b>Consistency Tests</b>   |
| 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.  |
|      | <b>Coherence and Effectiveness Tests</b>   |
| 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.





1594

- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1595

**T25 Land at Congl Y Wal, Blaenau Ffestiniog**

- Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.

1596

- The foul flows would lead to Tanrhos Manod Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed. Should off-site sewers be required these can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1597

**T26 Former Hendre School, Caernarfon**

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1598

**T27 To the rear of Maes Gwynedd, Caernarfon**

- A water supply can be provided to serve this site.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.

1599

1600

- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1601

**T28 Cae Phillips Road, Caernarfon**

- This site has planning permission as such we have no further comment to make.

1602

**T29 Land near Lon Caernarfon, Pwllheli**

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.

1603

- A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Pwllheli Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

|   |  |   |
|---|--|---|
|  |  <p>CYNGOR SIR<br/>YNYS MÔN<br/>ISLE OF ANGLESEY<br/>COUNTY COUNCIL</p> | <p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 31/3/15<br/>edw</p> <p>Date acknowledged:</p> |
|---|--|---|

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

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**PART 1: Contact details**

|                  | Your details/ Your client's details | Agent's details (if relevant) |
|------------------|-------------------------------------|-------------------------------|
| Name             | [REDACTED]                          |                               |
| Address          | WELSH WATER<br>[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.

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

Ennam saflwoodd

|  |   |
|--|---|
| <b>2a. Which part of the Deposit Plan are you commenting on?</b> |   |
| Policy number (please specify)                                   | TA114   |
| Paragraph number (please specify)                                | Housing in Sub regional centre + Urban service centre |
| 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 type="checkbox"/> | Supporting | <input type="checkbox"/> |

|   |
|---|
| <b>2c. Please provide details of your representation on the Deposit Plan.</b>   |
| <p style="text-align: right; margin-top: 20px;">Please use additional sheet if necessary.<br/>Please state how many additional sheets have been used.....</p> |

**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 ☐ 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 type="checkbox"/> | 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. | <input checked="" type="checkbox"/> |
| I want to speak at a hearing session.   | <input type="checkbox"/>            |

**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.**

|                  |
|------------------|
| <br><br><br><br> |
|------------------|

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

|   |                                     |
|---|-------------------------------------|
| Submission of documents and evidence to the examination | <input checked="" type="checkbox"/> |
| Publish Inspector's report                              | <input checked="" type="checkbox"/> |
| Plan's adoption   | <input checked="" type="checkbox"/> |

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

|              |
|--------------|
| <br><br><br> |
|--------------|

|   |                |
|---|----------------|
| Signed:  | Dated: 31/3/15 |
|---|----------------|

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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**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.  |
|      | <b>Consistency Tests</b>   |
| 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.  |
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| CE3  | There are no clear mechanisms for implementation and monitoring.   |
| CE4  | It is not reasonably flexible to enable it to deal with changing circumstances.  |

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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.



1594

- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1595

**T25 Land at Congl Y Wal, Blaenau Ffestiniog**

- Potential developers need to be aware that this site is crossed by water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.

1596

- The foul flows would lead to Tanrhos Manod Pumping Station (SPS) and an assessment of this SPS may be needed to establish whether the flows can be accommodated or whether improvements to the SPS will be required to allow development to proceed. Should off-site sewers be required these can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991.
- Blaenau Ffestiniog Wastewater Treatment Works (WwTW) can accommodate the foul flows from the domestic demands arising from this development area.

1597

**T26 Former Hendre School, Caernarfon**

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1598

**T27 To the rear of Maes Gwynedd, Caernarfon**

- A water supply can be provided to serve this site.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991. There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.

1599

1600

- The proposed growth being promoted for this settlement would require improvements at Caernarfon Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1601

**T28 Cae Phillips Road, Caernarfon**

- This site has planning permission as such we have no further comment to make.

1602

**T29 Land near Lon Caernarfon, Pwllheli**

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.

1603

- A hydraulic modelling assessment (HMA) may be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.
- Pwllheli Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.