


REP NO: 616

ID 3041

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15 <i>[Signature]</i></p> <p>Date acknowledged:</p>
<p>NEED TO SCAN</p>		

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

NO SUMMARY EMAIL NEEDED

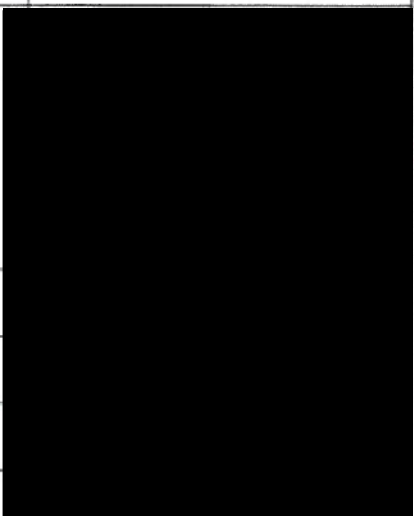
Data Protection

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

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

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

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	RCH Douglas Pennant	Chris Bell
Address	C / O Agent	
Postcode		
Telephone Number		
Email address		

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 <i>(please specify)</i>	PS15 / TAI17
Paragraph number <i>(please specify)</i>	6.20/7.4.124
Proposals/ Inset Map <i>(please specify ref no.)</i>	Inset Map 86
Constraints Map	
Appendices <i>(please specify)</i>	

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.
Please see attached document.

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

Objection to the restriction of growth in Tregarth to 13 windfall dwellings over the plan period and the drawing of the development boundary.

Objection to the sustainability assessment for Tregarth (settlement score). The current approach actually puts at risk the viability of local services.

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

A wider development boundary to permit an increased number of dwellings in Tregarth, which would better support the local services.

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		P2		C1		C2		C3		C4		CE 1		CE 2		CE 3		CE 4	

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.

Representation of landowner with regards Settlement Hierarchy, Projected Housing numbers & Settlement of Tregarth (Map Inset 86).

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption	<input checked="" type="checkbox"/>
If additional documents have been provided to support your representations, please list below:	
Supporting Statement	

Signed: 	Dated: 31/3/2015
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THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

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

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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

Test of Soundness

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

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

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

Carter Jonas

ANGLESEY & GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011-2026)

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

Title:	Tregarth
Client:	RCH Douglas Pennant
Agent:	Charlene Sussums-Lewis Chris Bell
Contact:	
Email:	

1. Introduction

- 1.1. These representations have been prepared in response to the Deposit Plan (2015) of the Joint Local Development Plan – Anglesey and Gwynedd (2011 – 2026).

2. Soundness

- 2.1. We consider that the Deposit Plan is unsound due to reason CE2 – *The strategies, 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.*

3. Deposit Plan

- 3.1. In the Deposit Plan, **Tregarth** is classified as a **Local Village**. The plan states that *'since the anticipated growth level of the Sub-Regional Centre and the Service Centres has been achieved either in the individual centre or centres within its catchment, in accordance with the plan's strategy, there will be no housing allocations in local, coastal or rural villages or in clusters. Anticipated growth level in these villages and the clusters will be achieved through windfall development. New development boundaries have been drawn in order to ensure that there are sufficient windfall sites for each settlement to meet its housing requirements.*
- 3.2. As stated in Paragraph 6.20...*The Deposit Plan has defined development boundaries around the Sub-Regional Centre, Urban Service Centres, Local Service Centres and Villages...Here development will be required to relate well to the existing built form...development boundaries and clusters are drawn in order to:*
- 3.2.1. *Prevent unacceptable development in the countryside and provide certainty and clarity as to where exception policies can be applied*
 - 3.2.2. *Avoid the coalescence of settlements or parts of the same settlement, new ribbon development or a fragmented development pattern*
 - 3.2.3. *Identify areas where development proposals could be approved*
 - 3.2.4. *Promote the efficient and appropriate use of land*
- 3.3. Policy **PS15** states that development in **Local Villages** will be restricted to a scale and type to address the community need. Policy **TA17** sets out the criteria for permitting new housing in

Local Villages. This includes helping to secure the viability of the local community and strengthening the community and linguistic character.

3.4. In terms of housing numbers, Paragraph 7.4.124 of the Deposit JLDP states that **Tregarth** requires an indicative windfall provision of **13** dwellings over the plan period (2011 – 2026). There was only one unit with planning permission in April 2014 and no other sites have been granted permission over the past 3 years. Furthermore, upon examining the Deposit Plan it is difficult to see how **13** dwellings could be accommodated within the proposed development boundary. The tightly drawn boundary has left limited opportunities for infill plots.

3.5. Sustainability - In Paragraph 7.2.4 of Topic Paper 5: Developing the Settlement Strategy, Tregarth received a Settlement Score of 23. We suggest that this tick box approach to producing a development strategy is an example of inflexible sustainability criteria, which can lead to a loss of services. As stated in the Taylor Review (2008), there is a need to recognise what rural communities can be like without writing them off as unsustainable. The key consideration should be whether new development will add to or diminish the social, economic and environmental sustainability of **Tregarth**. The settlement is at risk of being caught in the '*sustainability trap*' if it is considered to be sustainable in narrow terms.

3.5.1. We would argue that the settlement strategy is too narrowly focused on access to services and reducing private car use. In fact, the viability of shops and other services in villages is at risk if growth is restricted, as found by the Taylor Review (2008). Furthermore, only permitting minimal development in smaller rural communities will continue to drive up house prices and increase the shortage of affordable homes. Small rural villages struggle to provide the same range of housing market options as urban areas and so we believe that a different policy approach is required.

3.5.2. The environment can still be protected when a better balance is found between it and high quality, small scale development to meet local demand. Ruling out whole categories of villages as unsustainable ignores the potential for enhancing the sustainability of many smaller rural communities. It is stated in Chapter 4 of Planning Policy Wales that the viability

of villages should be maintained. In addition, TAN 6 states that new development can help to generate wealth to support local services ensuring long term sustainability.

3.5.3. The following services are currently available in **Tregarth**:

- Primary School
- Bus Service
- Community Centre
- Public House
- Places of Worship
- Playgroups
- Employment Opportunities

The table below shows the additional services that are available in nearby settlements.

Service	Settlement Name	Distance from Tregarth (km)
Post Office	Bethesda	2.0
Convenience Store	Bethesda	2.0
Secondary School	Bethesda	2.0
Supermarket	Bangor	7.9
Doctor's Surgery	Bethesda	2.0
Dentist	Rachub	1.4
Pharmacy	Bethesda	2.0

3.5.4. We believe that restricting housing growth in **Tregarth** to **13** dwellings over the plan period will put these local services at risk. There was a 14.8% drop in the population of 0 – 15 year olds and a 13.2% drop in the number of households with dependent children in the area between 2001 and 2011. Although there was a 16.0% increase in the economically active population for the same period, we would argue that the decrease in young families is a concerning trend for the viability of local services.

3.6. Holiday / Second Homes – Paragraph 4.8 identifies holiday / second homes as a key issue for communities and the housing market. However, we consider that the level of risk will vary for each particular community and so we contest the blanket policy approach. We do not regard **Tregarth** to be a popular location for holiday / second home ownership and we believe that the Deposit Plan should state an acceptable level of second home ownership for settlements as seen in Policy CH10 of the UDP.

4. Conclusion

4.1. We believe that the approach taken to determining the sustainability of the settlement of **Tregarth** is too prescriptive and that the indicative windfall number for the plan period is too low. We suggest that a wider settlement boundary is drawn to enable a greater level of growth and more support for local services.

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15 (above)</p> <p>Date acknowledged:</p>
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Data Protection

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	RCH Douglas Pennant	Chris Bell
Address	C / O Agent	
Postcode		
Telephone Number		
Email address		

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)	① PS15 / TAI18 ②
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	Inset Map 221 ③
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.
Please see attached document.

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

Objection to the restriction of growth in Talybont to 2 windfall dwellings over the plan period and the absence of a development boundary.

Objection to the sustainability assessment for Talybont (settlement score). The current approach actually puts at risk the viability of local services.

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

A development boundary to permit an increased number of dwellings in Talybont, which would better support the local services.

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

☐

P2

☐

C1

☐

C2

☐

C3

☐

C4

☐

CE

☐

CE

☒

CE

☐

CE

☐

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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.

Representation of landowner with regards Settlement Hierarchy, Projected Housing numbers & Settlement of Talybont (Map Inset 221).

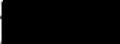
3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination

☒

Publish Inspector's report

☒

Plan's adoption	<input checked="" type="checkbox"/>
If additional documents have been provided to support your representations, please list below:	
Supporting Statement	
Signed: 	Dated: 31/3/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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Test of Soundness

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	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
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	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

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ANGLESEY & GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011-2026)

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

Title:	Talybont
Client:	RCH Douglas Pennant
Agent:	Charlene Sussums-Lewis Chris Bell
Contact:	
Email:	

1. Introduction

- 1.1. These representations have been prepared in response to the Deposit Plan (2015) of the Joint Local Development Plan – Anglesey and Gwynedd (2011 – 2026).

2. Soundness

- 2.1. We consider that the Deposit Plan is unsound due to reason CE2 – *The strategies, 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.*

3. Deposit Plan

- 3.1. In the Deposit Plan, **Talybont** is classified as a **Cluster**. The plan states that *'since the anticipated growth level of the Sub-Regional Centre and the Service Centres has been achieved either in the individual centre or centres within its catchment, in accordance with the plan's strategy, there will be no housing allocations in local, coastal or rural villages or in clusters. Anticipated growth level in these villages and the clusters will be achieved through windfall development. New development boundaries have been drawn in order to ensure that there are sufficient windfall sites for each settlement to meet its housing requirements.*

- 3.2. As stated in Paragraph 6.20...*The Deposit Plan has defined development boundaries around the Sub-Regional Centre, Urban Service Centres, Local Service Centres and Villages. Clusters do not have settlement boundaries*Here development will be required to relate well to the existing built form...*development boundaries and clusters are drawn in order to:*

- 3.2.1. *Prevent unacceptable development in the countryside and provide certainty and clarity as to where exception policies can be applied*
- 3.2.2. *Avoid the coalescence of settlements or parts of the same settlement, new ribbon development or a fragmented development pattern*
- 3.2.3. *Identify areas where development proposals could be approved*
- 3.2.4. *Promote the efficient and appropriate use of land*

- 3.3. Policy PS15 states that in **Clusters** local need affordable housing units will be permitted on infill or extension plots in acceptable and sustainable locations. Policy **TAI18** sets out the criteria for

permitting new housing in **Clusters**. The key point is that residential development will be restricted to affordable dwellings for local community need.

3.4. In terms of housing numbers, Policy **TA18** of the Deposit JLDP states that **Clusters** will be limited to a maximum of two units per cluster over the plan period (2011 – 2026). There have been no new dwellings permitted in **Talybont** over the past three years. Furthermore, upon examining the Deposit Plan it is difficult to see how further dwellings could be accommodated within the existing built form of the settlement.

3.5. Sustainability - In Paragraph **7.2.4** of Topic Paper 5: Developing the Settlement Strategy, **Talybont** received a Settlement Score of 8. We suggest that this tick box approach to producing a development strategy is an example of inflexible sustainability criteria, which can lead to a loss of services. As stated in the Taylor Review (2008), there is a need to recognise what rural communities *can* be like without writing them off as unsustainable. The key consideration should be whether new development will add to or diminish the social, economic and environmental sustainability of **Talybont**. The settlement is at risk of being caught in the '*sustainability trap*' if it is considered to be sustainable in narrow terms.

3.5.1. We would argue that the settlement strategy is too narrowly focused on access to services and reducing private car use. In fact, the viability of shops and other services in settlements is at risk if growth is restricted, as found by the Taylor Review (2008). Furthermore, only permitting minimal development in smaller rural communities will continue to drive up house prices and increase the shortage of affordable homes. Small rural settlements struggle to provide the same range of housing market options as urban areas and so we believe that a different policy approach is required.

3.5.2. The environment can still be protected when a better balance is found between it and high quality, small scale development to meet local demand. Ruling out whole categories of settlements as unsustainable ignores the potential for enhancing the sustainability of many smaller rural communities. It is stated in Chapter 4 of Planning Policy Wales that the viability

of settlements should be maintained. In addition, TAN 6 states that new development can help to generate wealth to support local services ensuring long term sustainability.

3.5.3. The following services are currently available in **Talybont**:

- Public House
- Bus Service
- Place of Worship

The table below shows the additional services that are available in nearby settlements.

Service	Settlement Name	Distance from Talybont (km)
Post Office	Maesgeirchen	2.3
Convenience Store	Bangor	1.9
Primary School	Llandygai	0.8
Secondary School	Bangor	2.6
Supermarket	Bangor	4.5
Doctor's Surgery	Bangor	5.3
Dentist	Bangor	3.8
Pharmacy	Bangor	3.8

3.5.4. We believe that restricting housing growth in **Talybont** to 2 dwellings over the plan period will put these local services at risk. There is an ageing population in the **Talybont** area with a 6.5% increase in people aged 65+ between 2001 and 2011. The population of 16-64 year olds only increased by 0.4% for the same period and the number of 0-15 year olds fell by

12.2%. We would argue that these statistical trends are a concern for the viability of local services.

3.6. Holiday / Second Homes – Paragraph 4.8 identifies holiday / second homes as a key issue for communities and the housing market. However, we consider that the level of risk will vary for each particular community and so we contest the blanket policy approach. We do not regard **Talybont** to be a popular location for holiday / second home ownership and we believe that the Deposit Plan should state an acceptable level of second home ownership for settlements as seen in Policy CH10 of the UDP.

4. Conclusion

4.1. We believe that the approach taken to determining the sustainability of the settlement of **Talybont** is too prescriptive and that the indicative number of dwellings for the plan period is too low. We suggest that a settlement boundary is drawn to enable a greater level of growth and more support for local services.

3070-730

Checklist for Comments on Deposit plan

Person ID: 3070

Representation Number: ① 730 ② 731 ③ 733

Date Received:

1) Inputting Comments

Has the comment and appendices (including a copy of the original representation) been inputted onto the JDi system? Y/N

Date: 20/4/15

Officer: M

Is there a need for a summary? Y/N

Is the summary correct? Y/N (need to ensure the summary includes any changes to the plan being sought)

Date letter for revised summary sent:

Date response received

Date any amendment to the summary in light of comments received

2) Translation

Date sent to the Translation Unit:

Date translation received:

Has the translation be inputted onto the JDi system? Y / N Date:

3) Acknowledgement

Has the comment been acknowledged on JDi system? Y / N Date:

Notes:

REP NO :

ID :

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15 <i>eb</i></p> <p>Date acknowledged:</p>
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Address	C / O Agent	[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]
Email address		[REDACTED]

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)	PS15 / TAI17
Paragraph number (please specify)	6.20/7.4.124
Proposals/ Inset Map (please specify ref no.)	Inset Map 73
Constraints Map	
Appendices (please specify)	

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

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

Please see attached document.

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

Objection to the restriction of growth in Llandygai to 8 windfall dwellings over the plan period and the drawing of the development boundary.

Objection to the sustainability assessment for Llandygai (settlement score). The current approach actually puts at risk the viability of local services.

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

A wider development boundary to permit an increased number of dwellings in Llandygai, which would better support the local services.

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 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.

Representation of landowner with regards Settlement Hierarchy, Projected Housing numbers & Settlement of Llandygai (Map Inset 73).

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

Submission of documents and evidence to the examination

☒

Publish Inspector's report

☒

Plan's adoption	<input checked="" type="checkbox"/>
If additional documents have been provided to support your representations, please list below:	
Supporting Statement	

Signed XXXXXXXXXX	Dated: 31/3/2015
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THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

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

BY EMAIL – planningpolicy@gwynedd.gov.uk

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

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

Test of Soundness

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

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

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

ANGLESEY & GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011-2026)

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

Title:	Llandygai
Client:	RCH Douglas Pennant
Agent:	Charlene Sussums-Lewis Chris Bell
Contact:	
Email:	

1. Introduction

1.1. These representations have been prepared in response to the Deposit Plan (2015) of the Joint Local Development Plan – Anglesey and Gwynedd (2011 – 2026).

2. Soundness

2.1. We consider that the Deposit Plan is unsound due to reason CE2 – *The strategies, 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.*

3. Deposit Plan

3.1. In the Deposit Plan, **Llandygai** is classified as a **Local Village**. The plan states that *'since the anticipated growth level of the Sub-Regional Centre and the Service Centres has been achieved either in the individual centre or centres within its catchment, in accordance with the plan's strategy, there will be no housing allocations in local, coastal or rural villages or in clusters. Anticipated growth level in these villages and the clusters will be achieved through windfall development. New development boundaries have been drawn in order to ensure that there are sufficient windfall sites for each settlement to meet its housing requirements.*

3.2. As stated in Paragraph 6.20...*The Deposit Plan has defined development boundaries around the Sub-Regional Centre, Urban Service Centres, Local Service Centres and Villages...Here development will be required to relate well to the existing built form...development boundaries and clusters are drawn in order to:*

3.2.1. *Prevent unacceptable development in the countryside and provide certainty and clarity as to where exception policies can be applied*

3.2.2. *Avoid the coalescence of settlements or parts of the same settlement, new ribbon development or a fragmented development pattern*

3.2.3. *Identify areas where development proposals could be approved*

3.2.4. *Promote the efficient and appropriate use of land*

3.3. Policy **PS15** states that development in **Local Villages** will be restricted to a scale and type to address the community need. Policy **TA17** sets out the criteria for permitting new housing in

Local Villages. This includes helping to secure the viability of the local community and strengthening the community and linguistic character.

3.4. In terms of housing numbers, Paragraph 7.4.124 of the Deposit JLDP states that **Llandygai** requires an indicative windfall provision of **8** dwellings over the plan period (2011 – 2026). There were 15 units permitted in September 2011 (application reference: C09A/0518/16/AM) but no other sites have been granted permission over the past 3 years. Furthermore, upon examining the Deposit Plan it is difficult to see how **8** further dwellings could be accommodated within the proposed development boundary. The tightly drawn boundary has left limited opportunities for infill plots.

3.5. Sustainability - In Paragraph 7.2.4 of Topic Paper 5: Developing the Settlement Strategy, **Llandygai** received a Settlement Score of 14. We suggest that this tick box approach to producing a development strategy is an example of inflexible sustainability criteria, which can lead to a loss of services. As stated in the Taylor Review (2008), there is a need to recognise what rural communities *can* be like without writing them off as unsustainable. The key consideration should be whether new development will add to or diminish the social, economic and environmental sustainability of **Llandygai**. The settlement is at risk of being caught in the '*sustainability trap*' if it is considered to be sustainable in narrow terms.

3.5.1. We would argue that the settlement strategy is too narrowly focused on access to services and reducing private car use. In fact, the viability of shops and other services in villages is at risk if growth is restricted, as found by the Taylor Review (2008). Furthermore, only permitting minimal development in smaller rural communities will continue to drive up house prices and increase the shortage of affordable homes. Small rural villages struggle to provide the same range of housing market options as urban areas and so we believe that a different policy approach is required.

3.5.2. The environment can still be protected when a better balance is found between it and high quality, small scale development to meet local demand. Ruling out whole categories of villages as unsustainable ignores the potential for enhancing the sustainability of many

smaller rural communities. It is stated in Chapter 4 of Planning Policy Wales that the viability of villages should be maintained. In addition, TAN 6 states that new development can help to generate wealth to support local services ensuring long term sustainability.

3.5.3. The following services are currently available in **Llandygai**:

- Primary School
- Bus Service
- Community Centre
- Place of Worship
- Playgroup
- Employment Opportunities

The table below shows the additional services that are available in nearby settlements.

Service	Settlement Name	Distance from Llandygai (km)
Post Office	Maesgeirchen	2.3
Convenience Store	Bangor	1.9
Secondary School	Bangor	2.6
Supermarket	Bangor	4.5
Doctor's Surgery	Bangor	5.3
Dentist	Bangor	3.8
Pharmacy	Bangor	3.8

3.5.4. We believe that restricting housing growth in **Llandygai** to 8 dwellings over the plan period will put these local services at risk. There is an ageing population in **Llandygai** with a 6.5% increase in people aged 65+ between 2001 and 2011. The population of 16-64 year olds only increased by 0.4% for the same period and the number of 0-15 year olds fell by 12.2%. We would argue that these statistical trends are a concern for the viability of local services.

3.6. Holiday / Second Homes – Paragraph 4.8 identifies holiday / second homes as a key issue for communities and the housing market. However, we consider that the level of risk will vary for each particular community and so we contest the blanket policy approach. We do not regard **Llandygai** to be a popular location for holiday / second home ownership and we believe that the Deposit Plan should state an acceptable level of second home ownership for settlements as seen in Policy CH10 of the UDP.

4. Conclusion

4.1. We believe that the approach taken to determining the sustainability of the settlement of **Llandygai** is too prescriptive and that the indicative windfall number for the plan period is too low. We suggest that a wider settlement boundary is drawn to enable a greater level of growth and more support for local services.

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 3083 / 868</p> <p>Date received: 31/3/15</p> <p>Date acknowledged: 2/4/15</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

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

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

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

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Hughes Bros Limited	Alyn Nicholls
Address	c/o Agent	Alyn Nicholls & Associates
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 or www.anglesey.gov.uk/ldp

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

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

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

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

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

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	PS15
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

<p>2c. Please provide details of your representation on the Deposit Plan.</p> <p>The sub-regional centre of Bangor and urban service centres, specifically Llangefni are capable of, and should, accommodate a greater percentage of the housing requirement in order to facilitate best use of resources and infrastructure and to deliver a sustainable pattern of development. Moreover, by indicating that "up to" 55% of the plan's growth should be located within main centres, the policy has the effect of placing a limitation which is not consistent with the strategy of the plan, particularly where developments could be accommodated without offending other policy objectives.</p> <p style="text-align: right;">Please use additional sheet if necessary. 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).

The plan should allow for more than 55% of growth to be at main centres.

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

For main centres, the words "up to 55% of the plan's growth" should be replaced with "at least 55% of the plan's growth".

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 checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" 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.

We wish to speak regarding total housing provision, the location of development and policy for student accommodation.

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



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

Signed:

Dated: 31 March 2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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

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

Test of Soundness

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

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

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