

15/08/25

11-956-ABERSOCH-ASDB25-MAP20

	 CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL	<i>For office use only:</i> Representor No. Date received: 24/3/15 ebost Date acknowledged:
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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	Mr Rod Thompson	Peter Marston
Address		
Postcode		
Telephone Number		
Email address		

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

The settlement boundary drawn on the inset map for Abersoch splits the curtilage of the property (shown edged red on the attached plan) into two. It is illogical that half of the curtilage of the property should be excluded from the settlement boundary particularly when it is adjoined on three sides by residential development that lie within the settlement boundary and on the fourth side by the Cors Llyferin SSSI where further expansion of the settlement would not be permitted.

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

Modification of the Settlement Boundary for Abersoch as indicated on the attached 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	☐	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.

☐ Yes if Council response is not positive

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.

That will depend on the Council's response to the representation and the reasons they give for their decision

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

Submission of documents and evidence to the examination

☐ Yes

Publish Inspector's report

☐ Yes

Plan's adoption

☐ Yes

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

Land use plan showing modifications to settlement boundary requested

Photographs showing the land in relation to adjoining properties

Signed:

Dated:

24 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.

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



Cyngor Gwynedd Candidate Site The Summer House, Abersoch



View looking east past greenhouse towards site access and properties fronting Lôn Golff



View looking north east towards 'The Chalet' and other properties beyond

Cyngor Gwynedd Candidate Site The Summer House, Abersoch



View looking west from vehicular access towards the property 'The Summer House' and 'Bryn Terrace'

Cyngor Gwynedd Candidate Site The Summer House, Abersoch



View from public footpath across the lower slope of the site towards 'Fairfield'

Sustainability Appraisal Matrix

Site Name: Land forming part of the curtilage of the property known as the Summer House, Abersoch
Site Area: 0.19h

SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)	+	The development of the land would not lead to the loss of an important habitat, priority species, trees or hedgerows, indeed these would be strengthened, as the land is already maintained as part of the garden of the existing property and accepted as a 'brown field site'.
2. Promote community viability, cohesion, health and well being (<i>SEA Topics: human health, population</i>)	0	Marginal benefit
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (<i>SEA Topics: climatic factors, air</i>)	+	Any development on the site would be fully in accordance with the principles of sustainability with recycling of water, low energy design and a roof planted with native species to encourage biodiversity.
4. Conserve, promote and enhance the Welsh language (<i>SEA Topic: cultural heritage</i>)	0	Marginal benefit
5. Conserve, promote and enhance cultural resources and historic heritage assets (<i>SEA Topic: cultural heritage</i>)	0	Marginal benefit
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (<i>SEA Topic: Population</i>)	+	Marginal benefit if the site was developed

7. Provide good quality housing, including affordable housing that meets local needs (<i>SEA Topic: population, human health</i>)	+	The development of the site would provide a good quality house for a local person and free up an existing dwelling to help meet a local need.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (<i>SEA Topics: landscape</i>)	+	The development of the land would ensure it was maintained and enhanced within the existing built environment by new hedgerow and tree planting with native species
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (<i>SEA Topic: material assets, soil</i>)	0	No change
10. Promote and enhance good transport links to support the community and the economy (<i>SEA Topic: population, human health</i>)	0	No change
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (<i>SEA Topic: water, biodiversity</i>)	+	There would be a marginal benefit through the collection and recycling of rain water. Any surplus storm water run off would enhance the adjoining SSSI wetland habitat.

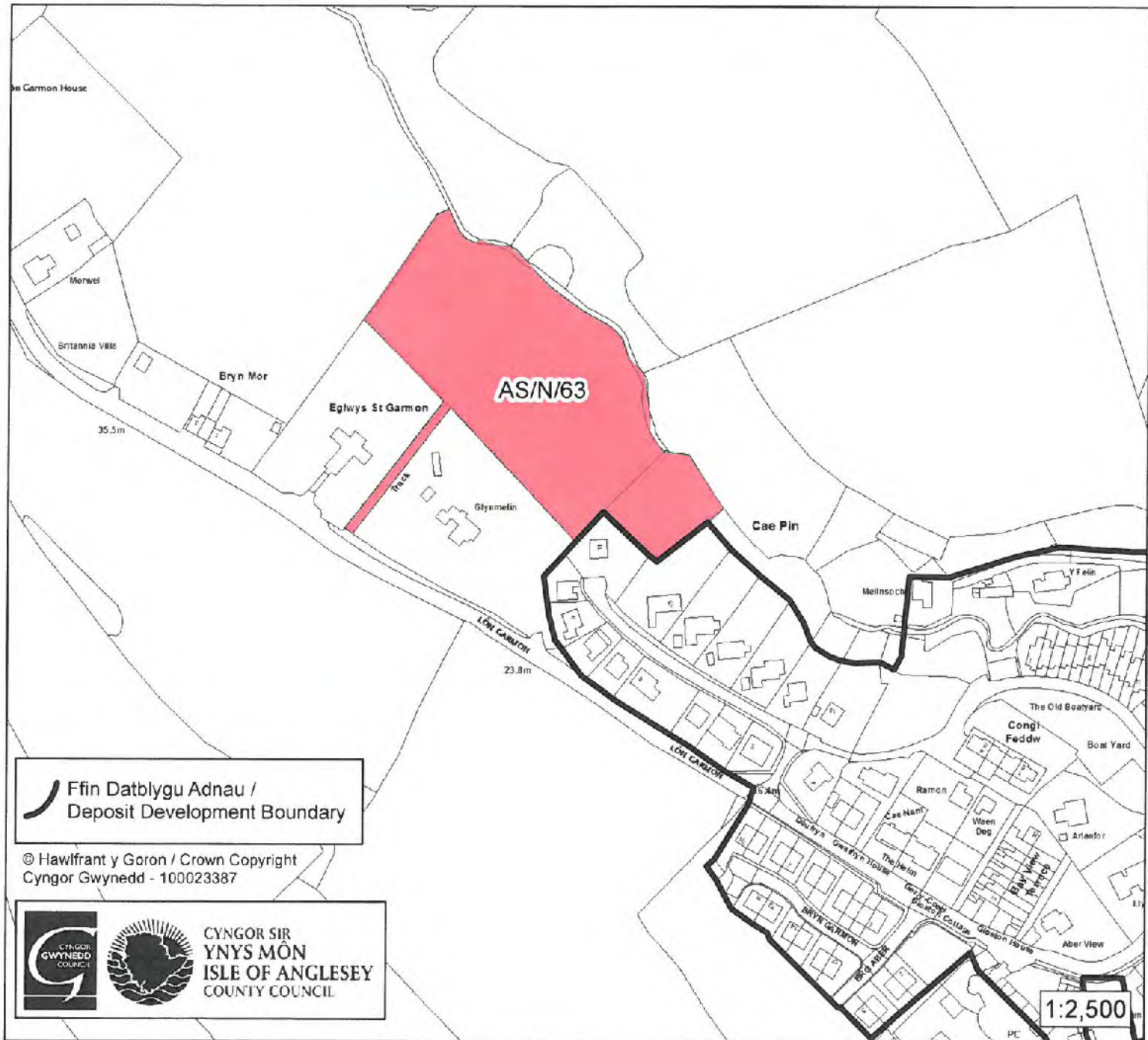
COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



Maint (ha) / Size (ha): 0.29

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: SAFLE NEWYDD / NEW SITE

Cyfeirnod / Reference: AS/N/63

Enw'r Safle / Site Name: Cae St Garmon / St Garmon Field

Lleoliad / Location: Abersoch

Cyngor Cymuned / Community Council: Llanengan

Maint (ha) / Size (ha): 1.2

Defnydd Amgen â Awgrymir / Suggested Alternative Use: Tai / Housing

Sustainability Appraisal Matrix

Site Name: Cae St Garmon Site Area: Abersoch (See attached map) Entrance coordinates: (52.828369, -4.511571)		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)	+	- Land is not in an area of outstanding natural beauty (AONB). - Planning permission would not be sought adjacent to a set distance from the stream bordering one edge of the plot, thus conserving habitat to wildlife. - Not a wooded area - Green infrastructure would not be affected. - Site not of interest as a geological site.
2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)	+	- Adjacent to existing footpath - Easy walking or cycling distance to village centre - No previous use to suggest land contamination - Approx 600m to village centre, where local school, post office, pharmacy, shops etc can be found. - Site would be an extension of an existing settlement as it borders the village boundary and 'Cae Pin' estate.
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)	+	- Development of the site would provide affordable housing, therefore provide suitable homes for people working in Abersoch who currently commute from the surrounding areas. - Site is accessible from the public highway with ease. An existing track links the site to the main road, this track would be developed onto an access road. - Site is adjacent to an existing bus route and bus stop, therefore would have little impact on traffic. - Site is walking distance into the village. - Routes out of Abersoch by road are accessible without the need to drive through the village of Abersoch, therefore not having a negative impact on traffic within the village. - No risk of flooding.
4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)	+	Affordable housing for local people is part of the proposal, therefore this is beneficial in preserving the Welsh language and the community that speaks Welsh as both 1st and 2nd languages.
5. Conserve, promote and enhance cultural resources and historic heritage		Development of the site would not

assets (<i>SEA Topic: cultural heritage</i>)	0	- impose on important views/vistas. - Development of the site would seem a natural expansion as it neighbours 'Cae pin' estate.
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (<i>SEA Topic: Population</i>)	+/0	Local tradesmen and developers would be used to carry out any construction work in developing the land. This would provide significant work over the construction period and therefore support the local economy.
7. Provide good quality housing, including affordable housing that meets local needs (<i>SEA Topic: population, human health</i>)	++	- The proposal is to provide a range of houses (up to 22 properties). Ideally properties would be a combination of affordable and market value homes. - Assists the LDP in meeting the target number of properties in the current period set out in the development plan.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (<i>SEA Topics: landscape</i>)	0	- The site is not an AONB. - Visually, if developed the land does not impose on the countryside. There is a natural gradient away from the main road, therefore the visual impact would be negligible.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (<i>SEA Topic: material assets, soil</i>)	++	The land is a conservation area, however it is noted that a recent development in close proximity has been built in an AONB.
10. Promote and enhance good transport links to support the community and the economy (<i>SEA Topic: population, human health</i>)	0	- An existing bus route and bus stop are within close proximity to the entrance to the site. This would promote the use of public transport. - There is an existing footpath adjacent to the site, that makes easy access by foot to the local amenities.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (<i>SEA Topic: water, biodiversity</i>)	0	The site is not on a flood risk area.

SCREEN SHOTS FROM GOOGLE MAPS OF SITE IN ABERSOCH.

Area – 2.8 Acres

The entrance track to the site shown here. Adjacent to the left in this image is St Garmon RC Church. The track leads off from Lon Garmon in Abersoch.



Plot illustrated off Lon Garmon and the surrounding Abersoch area.



Approximate Boundary of site and access track. Note – extends to a stream from the north tip to the easterly tip.



AS/N/63



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received: 31/3/15
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Date acknowledged:

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	Daniel Bufton	
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 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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	Map / Insert 20
Constraints Map	
Appendices (please specify)	

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

Objecting	☒	Supporting	☐
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2c. Please provide details of your representation on the Deposit Plan.

I am representing the need in the Abersoch area to allow building, as per the LDP a further 67 dwellings.

There are currently not enough plots available to build the further dwellings stated, and it is proposed the village boundary be moved/extended at the North West most region on Lon Garmon. I am representing a land owner who has a plot of 2.8 acres adjacent to the building line of the village. Cae St Garmon. It is proposed that this land be used for development of a mixture of affordable and market value homes, therefore satisfying some of the demand for houses stated in the LDP.

Enclosed are reference maps and photographs for your use. The exact location is O.S. Fields 9666 & 0216. The approximate acreage of the site, excluding the access track is 2.8 Acres.

I would like to outline the following points when considering 'Cae St. Garmon' for future development plans.

1. There is a strong demand for local housing in and around the Abersoch area. The site could provide such a site with ample prospect for development of local housing with sufficient parking.
2. The site is a sustainable, feasible, suitable and a deliverable site, free of development constraints such as issues with drainage, access & flooding.
3. The land would form a sensible development boundary as is adjoining to the existing building line and the Cae Pin housing estate. The site slopes away from Lon Garmon and therefore any properties built should not impose visibly on existing properties in the area.
4. The site is on a major public transport (bus) route and within close proximity, therefore walking distance of all of Abersoch's amenities, shops, school, banks, etc. There is also a public footpath adjacent to the NE boarder to the site which exits near Land & Sea on the A499.
5. The site is NOT within an area of outstanding natural beauty (AONB), but a conservation area. I would note that a recent development nearby on Lon Garmon (Bron Aber) has recently been constructed in an AONB.
6. There is good access via an existing track (See photo). Further land can be acquired should this track need to be widened in order to satisfy any highway regulatory requirements.

Further to the above points I would be happy to hold a meeting at your convenience at the site in order to clarify any issues should you feel this may be beneficial.

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.

An extension of the village boundary / building line, along Lon Garmon, Abersoch. This would allow construction of 22 new homes. There is a requirement in the development plan for 67 dwellings in the Abersoch area and very few plots to build them.

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	☐
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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.	
If necessary I have no objection to speaking at a hearing, if it is deemed necessary to clarify any issues I have outlined in this document.	
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:	
Photographs illustrating the land location	

Signed: Daniel Bufton	Dated: 31/03/2015
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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.

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REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
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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.

SCREEN SHOTS FROM GOOGLE MAPS OF SITE IN ABERSOCH.

Area – 2.8 Acres

The entrance track to the site shown here. Adjacent to the left in this image is St Garmon RC Church. The track leads off from Lon Garmon in Abersoch.



Plot illustrated off Lon Garmon and the surrounding Abersoch area.

Approximate Boundary of site and access track. Note – extends to a stream from the north tip to the easterly tip.



Local Service Centre

Map / Inset 20

Abersoch



Map / Inset 114 - Sarn Bach

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Alex Badley	Keith Warren
Address		Asbri Planning Ltd
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>	TAI 15
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	✓ Inset Map 20
Constraints Map	
Appendices <i>(please specify)</i>	

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

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

Whilst we acknowledge and support the identification of Abersoch as a Local Service Centre, **we object to Policy TAI15** on the grounds that no sites are identified as housing land allocations within the settlement. We also object on the grounds that the site promoted (Hen Dy Farm – SP 830) is excluded from the schedule of housing allocations under this policy.

We contend that insufficient provision is made in the local service centre of Abersoch as there is limited scope within the existing settlement boundary to provide for local housing needs, including affordable housing.

By not providing for necessary growth in such a sustainable settlement the Deposit Plan fails Test of Soundness C2 and CE2..

See accompanying Submission document for full reasons given.

*Please use additional sheet if necessary.
Please state how many additional sheets have been used _____*

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

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

The site in question should be allocated for 90 dwellings in subsequent Focused Changes. This would be of a scale compatible with the role and function of Abersoch and its status as a Local Service Centre.

See accompanying Submission document.

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. C2, CE2*

Procedural				Consistency								Coherence & Effectiveness							
CE1	CE4	P2		C1		C2	x	C3		C4		1		2	x	3		CE	

Part 3: What Happens Next?

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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.

To discuss the merits of the site and the need to identify the site as a housing land allocation to meet the requirements for future growth in Abersoch

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:

Submission Document

Sustainability Appraisal

Signed:

Dated: 31st 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.

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.

31/3/15
ebou

Joint Local Development
Plan Anglesey &
Gwynedd (2011 – 2026)
Deposit Plan

**Land at Hen Dy Farm,
Abersoch**

**Representations Submitted
on behalf of Mr Alex Badley**

March 2015

Section 1

Introduction

Section 2

Characteristics of the Site

Section 3

Comments on the Strategy

Section 4

Comments on Housing Provision

Section 5

Comments on Housing in Local Service Centres

Section

Comments on Site Assessment Process

Section 6

Conclusion

Appendix 1 – Site Location Plan

Appendix 2 – SA/SEA Matrix

Introduction

- 1.1 These representations comment on the Anglesey & Gwynedd Joint Local Development Plan 2011-2026 Deposit Plan on behalf of Mr Alex Badley.
- 1.2 The site at Hen Dy Farm, Abersoch was promoted rigorously, as a Candidate Site – SP 830, and through representations on the LDP Preferred Strategy. We are therefore disappointed that the site has not emerged as a housing or mixed housing/tourism allocation in the Deposit Plan. For the reasons given in this Submission Statement, and in the accompanying Representation Forms, we consider that its release for housing development should be made as it clearly meets the provisions of the Deposit Plan as a sustainable site in a Local Service Centre - Abersoch.
- 1.3 We therefore wish to see the site included as a residential land allocation in future Focused Changes to the Plan and we therefore welcome this opportunity to formally submit representations to demonstrate the compatibility of the site with the Deposit Plan strategy and its credentials in terms of sustainability and deliverability.
- 1.4 The Statement is structured as follows:
 - In Section 2 we describe the characteristics of the site;
 - In Section 3 we comment on the Strategy;
 - In Section 4 we comment on Housing Provision;
 - In Section 5 we discuss Housing in Local Service Centres;
 - In Section 6 we comment on the Site Assessment Process
 - Our Conclusions are highlighted in Section 7.

Site Characteristics

- 2.1 The site is 3.2 hectares in area and lies between two unclassified roads which emerge from the built-up area of Abersoch. The site area is occupied by three parcels of rough grazing land, contained by hedgerows. The land is gently sloping, rising generally from the south-west to north-east.
- 2.2 To the south lies a road which links Abersoch with Llanengan, some 3 kilometres to the south-west and represents an extension of Lon Engan which serves the neighbouring residential area to the south-east of the site. The road is limited in width with no footways. However, land either side is in the control of the site promoter and work previously undertaken by NH Consult has established that adequate widths, together with a suitable form of access and required vision splays could be achieved. This access would be located in the western part of the site.
- 2.3 In the north-east of the site is a field access which lies opposite the access road to Hen Dy Farm. Here, the unclassified road referred to in the previous paragraph, serves a grouping of residential properties either side of a caravan park. The road, which runs along the northern site boundary, is a single lane carriageway which narrows to the east, in a 'pinch point'. Beyond this to the east it serves residential cul de sacs, including Tan y Gaer.
- 2.4 It has been suggested through previous submissions that, as part of the proposals, this access be restricted to an emergency/ footpath route, with the main access through the proposed residential development, via the improvements proposed above, which would also serve the caravan park, and existing residential uses. The northern part of the site would accommodate car parking to serve the proposed leisure uses at Hen Dy Farm.

The Strategy and Strategic Policies

- 3.1 We generally support the Strategy which identifies a Settlement Hierarchy based on rankings set out in Topic Paper 5: Developing the Settlement Strategy. In this context the Strategy proposes:
- ***An emphasis on developing the Sub Regional Centre and the Urban and Local Service Centres, where environmental, social and infrastructure constraints allow.***
- 3.2 Abersoch is defined as a Local Service Centre and this submission will demonstrate that there is a need for further development which should not be restricted by the environmental, social and infrastructure constraints referred to. The development proposed at Hen Dy Farm would complement the strong network of settlements which make the plan area more efficient in terms of access to jobs, affordable homes and services, including tourism and leisure.
- 3.3 There is consequently a need for an appropriate release of development land in Abersoch rather than a total restriction of growth as is proposed.
- 3.4 The development would meet the provisions of Strategic Policy PS5: Sustainable Development for the following reasons:
1. It would accord with national policy as development of an appropriate scale in a recognised Service Centre;
 2. It would alleviate the causes of climate change and adapt to impacts in accordance with Strategic Policy PS6, and is not located in a flood risk area;
 3. It would give priority to effective use of land and infrastructure in accordance with Strategic Policy PS15;
 4. It would promote greater self containment of centres and villages by contributing to a balanced community that are supported by sufficient services;
 5. It would protect and promote the use of the Welsh Language in accordance with Strategic Policy PS1 by providing for local needs and stemming population loss;
 6. It would preserve and enhance the quality of the built and historic environment in accordance with Strategic Policy PS17;

7. It would seek to protect and improve the quality of the natural environment by retaining features on site, and suitable mitigation measures, in line with Strategic Policy PS17;
8. It would reduce the effect on local resources, avoiding pollution and incorporating sustainable building principles;
9. It would seek to reduce water use, manage flood risk and maximise opportunities for sustainable drainage;
10. It would meet the needs of the local population in terms of quality, types, tenure and affordability of housing in accordance with Strategic Policy PS13;
11. It would promote a varied and responsive local economy in accordance with Strategic Policy PS10;
12. It would support the local economy and businesses by the provision of live/work units where appropriate in accordance with Strategic Policy PS10;
13. It would reduce the need to travel and encourage walking, cycling and public transport in accordance with Strategic Policy PS4;
14. It would promote high standards of design that make a positive contribution to the local area in accordance with Policy PCYFF2.

Housing Provision

- 4.1 Strategic Policy PS13: Housing Provision, states that:
- 'Based on the level of anticipated housing need, balanced against deliverability, environmental constraints and landscape capacity, the Council's will make provision for a requirement of 7,184 housing units between 2011 and 2026. This requirement will be met by identifying opportunities for around 7,902 housing units to enable a 10% slippage allowance.'***
- 4.2 We note from the accompanying Topic Paper 4A – Describing Housing Growth – Update, that the Welsh Government 2011 –based Household and Population projections have been referred to in justifying a lower level of growth to that previously proposed in the Preferred Strategy. The Preferred Strategy proposed 7,665 dwellings , excluding the slippage/flexibility allowance.
- 4.3 The Preferred Strategy therefore allowed for an annual requirement of 511 rather than 479 which is currently proposed. Of the current 7,184 dwellings required under Policy PS13, 3,472 are apportioned to Anglesey, with 3,712 required in Gwynedd. As a consequence an annual completion rate in Gwynedd of 247 dwellings is targeted.
- 4.4 Over the previous 10 years, Gwynedd has achieved an average completion rate of 190 dwellings. However, this has largely reflected slow growth rates during a recessionary period. It is noted that rates exceeded 250 a year between 2007-08 (250), and 2008-09 (287). It is therefore reasonable to anticipate that in an improving market completion rates will once again exceed 250 dwellings. This would be in excess of the provision which is allowed for in the Deposit Plan.
- 4.5 In a letter dated 17th April 2014, Welsh Government Planning Minister Carl Sargeant wrote to planning officers, council chiefs and cabinet members with responsibility for planning, urging them to be careful in the way they use the 2011 household projections. The letter stated that :
- "The assumptions underlying these projections are based on past trends which have been significantly affected by recent past economic conditions resulting from the global economic crisis. As a consequence they may give rise to lower household projections and higher household sizes than in previous projections; it is important that this is borne in mind when using the projections for planning purposes."***

- 4.6 The letter further goes on to state that it would not be prudent for local development plans, looking 15-20 years ahead, to replicate a period of exceptionally poor economic performance, and it was stressed that:
- "For the avoidance of any future doubt, local planning authorities must seek to provide for the level of housing required as a result of the analysis of all relevant sources of evidence rather than relying solely on the Welsh Government's household projections."***
- 4.7 In view of the above we therefore **object to Policy PS13** on the grounds that the housing requirement places too much emphasis on the 2011 Household projections and environmental capacity issues. As such the figure originally included in the Preferred Strategy, i.e. 7,665 together with a further 10% slippage allowance, should be reinstated as a minimum requirement.
- 4.8 It is also noted that a baseline requirement under the policy provides for 2,604 dwellings to be delivered between 2011 and 2018, with further growth of 5,298 between 2018 and 2026.
- 4.9 This appears to be disproportionate in view of the TAN 1 provisions where a 5 year supply will be required immediately on adoption of the Plan. To meet the residual requirement (5 x 479), 2,395 dwellings should be identified as a minimum, in the period 2014 to 2018. This is in addition to the 917 completed 2011-14 in both authority areas.
- 4.10 Given that overall numbers should be increased we suggest that the baseline figure should be 3,500 dwelling units. Otherwise the Plan fails to meet Test of Soundness C2 in not having regard to national policy.
- 4.11 This would further place an emphasis on attractive and readily developable sites which are capable of contributing to a 5 year land supply, including the site being promoted.

Housing in Local Service Centres

- 5.1 Whilst we acknowledge and support the identification of Abersoch as a Local Service Centre, **we object to Policy TA115** on the grounds that no sites are identified as housing land allocations within the settlement. We also object on the grounds that the site promoted is excluded from the schedule of housing allocations under this policy.
- 5.2 It is stated under Policy PS15: Settlement Strategy that at least 20% of the Plan's growth will be accommodated in Local Service Centres. In the related text it is stated that the provision will be made through *'commitments and new allocations including allocating key housing sites (open market housing with a proportion of affordable provision). In addition windfall sites within the development boundary can be permitted.'*
- 5.3 We contend that insufficient provision is made in the local service centre of Abersoch as there is limited scope within the existing settlement boundary to provide for local housing needs, including affordable housing.
- 5.4 By not providing for necessary growth in such a sustainable settlement the Deposit Plan fails Test of Soundness CE2 as the policies and allocations are not realistic and appropriate having considered the relevant alternatives and are not founded on a robust and credible evidence base.
- 5.5 Elsewhere in Wales local planning authorities have brought in additional sites as a result of Inspectors' concerns regarding allocations not reflecting settlement strategies. An example is the Brecon Beacons LDP where insufficient growth was originally allowed for in service centres such as Sennybridge, Crickhowell and Talgarth. These centres are of a similar scale, and bear comparison with Abersoch.
- 5.6 In order to avoid a similar situation occurring we therefore propose that the site in question should be allocated for 90 dwellings in subsequent Focused Changes. This would be of a scale compatible with the role and function of Abersoch and its status as a Local Service Centre.

The Site Assessment Process

- 6.1 In this Section we comment on the site assessment process carried out in respect of the land at Hen Dy Farm, Abersoch. We also refer to the SA/SEA site assessment which has been carried out as a requirement in submitting the 'Alternative Site' proposed.
- 6.2 The reasons for excluding the site (SP830) are given in the Site Assessment Schedule as follows:
- *Submission is for two separate sites for tourism and housing; land to the north of and to the west of Tan y Gaer estate.*
 - *The site to the north of Tan y Gaer does not form a logical extension to the settlement and development in this location is considered to be undesirable encroachment into the open countryside, and therefore will not be taken forward to the JLDP.*
 - *No allocation is required in the settlement as there is a sufficient land bank and windfall opportunities to meet the settlement's housing needs.*
 - *In terms of tourism no allocation is required. Acceptability can be determined through the planning application process judging the proposal against policy criteria found in the Plan.*
- 6.3 The above are strongly disputed for reasons given in previous sections of this submission document, particularly the statement to the effect that no allocation is required in the settlement.
- 6.4 Whilst tourism uses could be pursued on the northern site in the absence of a specific site allocation, it is related to the proposed housing as an improved access and car parking would be required via the housing site. Advice in Planning Policy Wales seeks to encourage mixed use allocations in order to achieve a more sustainable use of land.
- 6.5 In the Council's assessment the emphasis seems to be on the northern site as representing an encroachment into the open countryside. This does not apply to the western site as it is partly enclosed by existing dwellings and tourism uses. In any event tourism uses on the northern

site would largely retain its open nature. We are nevertheless excluding the northern site from the Alternative Site submission.

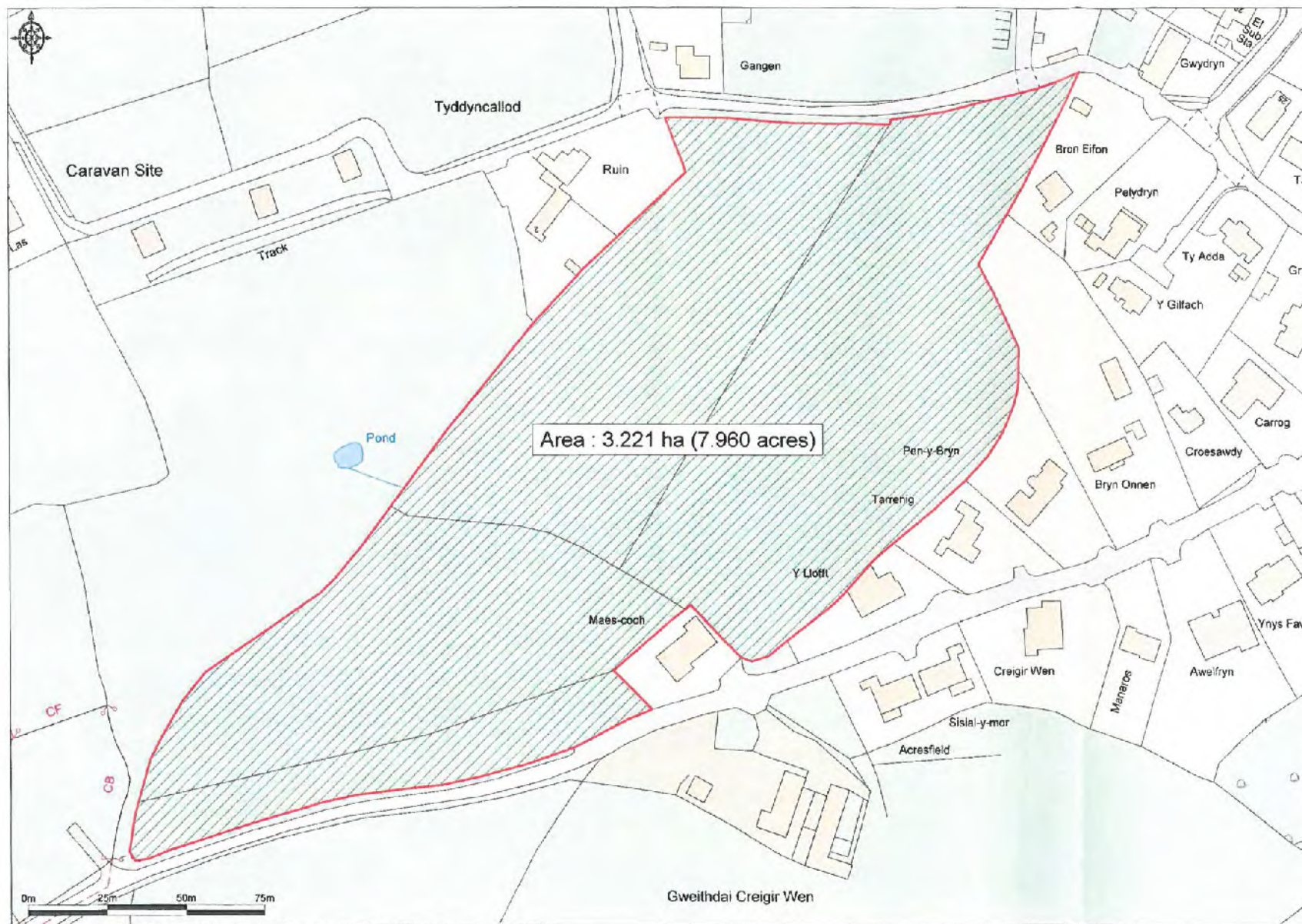
- 6.6 We have considered the site against the Plan's Sustainability Objectives, and provide an assessment which is included in Appendix 2. This shows that 2 ++ scores would result; 6 + scores, 2 +/- scores and 1 0 (neutral) score.

Conclusions

- 7.1 This representation is made by Asbri Planning Limited on behalf of Mr Alex Badley. We are promoting land at Hen Dy Farm, Abersoch as an Alternative Site in view of the stance adopted by Gwynedd Council in not allocating the site for housing, and indeed, not allowing for further housing land allocations in Abersoch..
- 7.2 These submissions have considered the content of the Plan and the various Background publications and can conclude that the release of the site for housing would be compatible with Strategic Policies.
- 7.3 We object to Policy PS13, where, for the reasons given, we consider that the housing requirement should be increased from 7,184 to 7,665 in accordance with the previous Preferred Strategy.
- 7.4 We also object to Policy TAI 15 on the basis of the exclusion of the site as a housing land allocation, and also for the reason that no new sites are proposed to accommodate the future housing needs of Abersoch.
- 7.5 As a consequence we consider that the Plan fails the Tests of Soundness C2 (not having regard to National Policy) and CE2 (the policies and allocations are not appropriate and not founded on a robust evidence base). A Sustainability Assessment under the plan's SA/SEA objectives has confirmed that the allocation of the site would meet the requirements and would compare favourably with sites elsewhere which are proposed to be allocated.
- 7.6 We therefore request that the site is considered in future Focused Changes, where a need will exist to re-appraise the need for housing in the settlement of Abersoch in order to maintain and enhance its role as a Local Service Centre.

Appendix 1 – Site Location Plan

Appendix 2 – Sustainability Appraisal Matrix

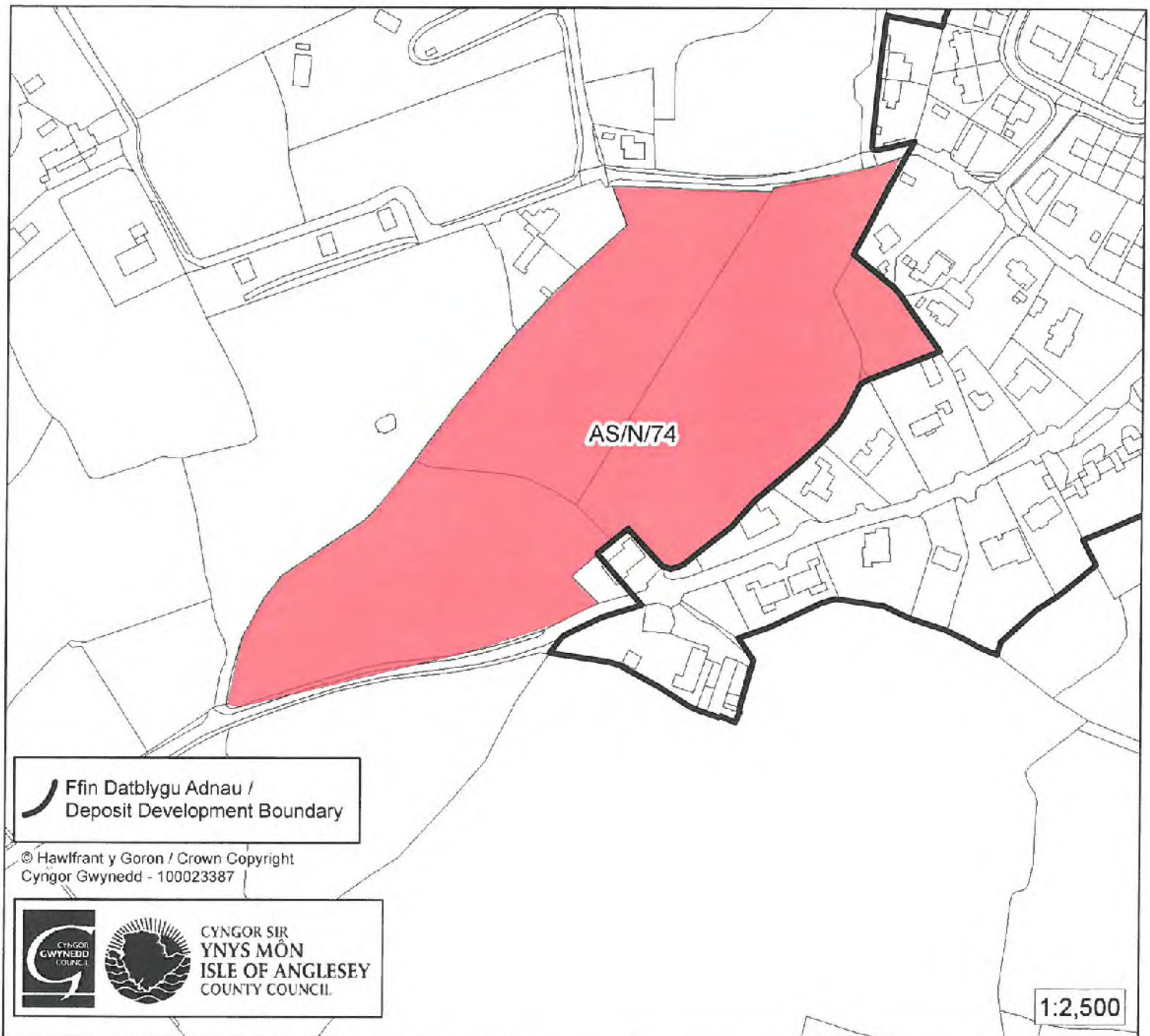


Sustainability Appraisal Matrix

Site Name - Hen Dy Farm, Abersoch			
Site Area – 3.2 Hectares			
SA Objective		Assessment	Summary
1.	Maintain and enhance biodiversity interests and connectivity (<i>SEA Topics: biodiversity, fauna, flora, soil</i>)	+/-	Potential sustainability issues but mitigation possible. No over-riding constraints as identified on Constraints Map.
2.	Promote community viability, cohesion, health and well-being (<i>SEA Topics: human health, population</i>)	++	Mix of housing opportunities would promote community cohesion.
3.	Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (<i>SEA Topics: climatic factors, air</i>)	+	Not in flood risk area. Sustainable building techniques to be applied.
4.	Conserve, promote and enhance the Welsh language (<i>SEA Topic: cultural heritage</i>)	+	Development would assist in retaining balanced community and provide both low cost market homes for first time buyers and affordable housing.
5.	Conserve, promote and enhance cultural resources and historic heritage assets (<i>SEA Topic: cultural heritage</i>)	+	No impacts on heritage assets.
6.	Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (<i>SEA Topic: population</i>)	+	Housing development would provide improved access and parking to adjacent tourism uses.
7.	Provide good quality housing, including affordable housing that meets local needs (<i>SEA Topics: population, human health</i>)	++	The development would provide an adequate range and choice of housing to meet community needs.
8.	Value, conserve and enhance the plan area's rural landscapes and urban townscapes (<i>SEA Topic: landscape</i>)	+/-	The site is contained by existing forms of development. Impact on the wider landscape would be mitigated by appropriate planting of native species.
9.	Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (<i>SEA Topic: material assets, soil</i>)	0	Greenfield site but proposals would aim to develop the site efficiently with sustainable construction techniques and waste reduction measures.
10.	Promote and enhance good transport links to support community and the economy (<i>SEA Topic: population, human health</i>)	+	Improved access and footpath
11.	Safeguard water quality, manage water resources sustainability and minimise flood risk (<i>SEA Topics: water, biodiversity</i>)	+	No flood risk - sustainable drainage measures will be applied.

**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: SAFLE NEWYDD / NEW SITE

Cyfeirnod / Reference: AS/N/74

Enw'r Safle / Site Name: Tir yn / Land at Hen Dy Farm

Lleoliad / Location: Abersoch

Cyngor Cymuned / Community Council: Llanengan

Maint (ha) / Size (ha): 3.4

**Defnydd Amgen â Awgrymir / Suggested Alternative Use: Tai a Thwristiaeth /
Housing and Tourism**

1169-1292

ASN/74

1169-1292-ABERSOCH-ASN74-MAP20

	 CYNGOR SIR YNYS MON ISLE OF ANGLESEY COUNTY COUNCIL	<i>For office use only:</i> Representor No. Date received: 27/3/16 elm Date acknowledged:
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o 	
Postcode		
Telephone Number		
Email address		

2a. Which part of the Deposit Plan are you commenting on?	
CPRW 28 Abersoch Housing Sites/Boundaries	
Policy number <i>(please specify)</i>	
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	Map 20 /SP830
Constraints Map	
Appendices <i>(please specify)</i>	

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

28. Abersoch/Housing Sites and Boundaries

28.1 We support the principle of limiting new housing to affordable and local use in coastal villages under particular pressure from second homes. We note that substantial housing needs are still predicted, in the case of Abersoch 65 units, but that all are to come from unspecified windfall or infill sites within the existing development boundary. We question whether this is feasible and are concerned about the lack of explicit housing site proposals if additional housing is in fact needed on this scale. The Candidate Site Register for the JLDP includes only one small site (SP455) within the development boundary and most of those proposed outside such as along the Sarn Bach road or at Machroes we would consider quite unsuitable. Were an extension to the village development boundary needed to accommodate housing and other urgent wants (such as retirement/sheltered houses), then we would support the southern section of the Hendy Farm proposal (SP830) as a reasonably sensible and logical development that would minimise landscape impact if designed sympathetically. This is an area of some 3 ha occupying a form of plateau on the western edge of the village. It would present some access limitations, but there are few other sites close to the village which would not also do so.

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

We question whether 65 windfall/infill sites could be found within the village development boundary of Abersoch and would prefer a suitable housing site to be identified. If there is evidence of genuine need for additional affordable/local housing on this scale, then in principle we would support use of SP830 (south) adjacent to the village boundary in the west. We would oppose other Candidate Site proposals on the Sarn Bach road and in Machroes, further from the village boundary, or in Mynytho, principally on grounds of adverse landscape impact.

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

☐

P2

☐

C1

☐

C2

☐

C3

☐

C4

☐

CE

☐

CE

☐

CE

☐

CE

☐

1

☐

2

☐

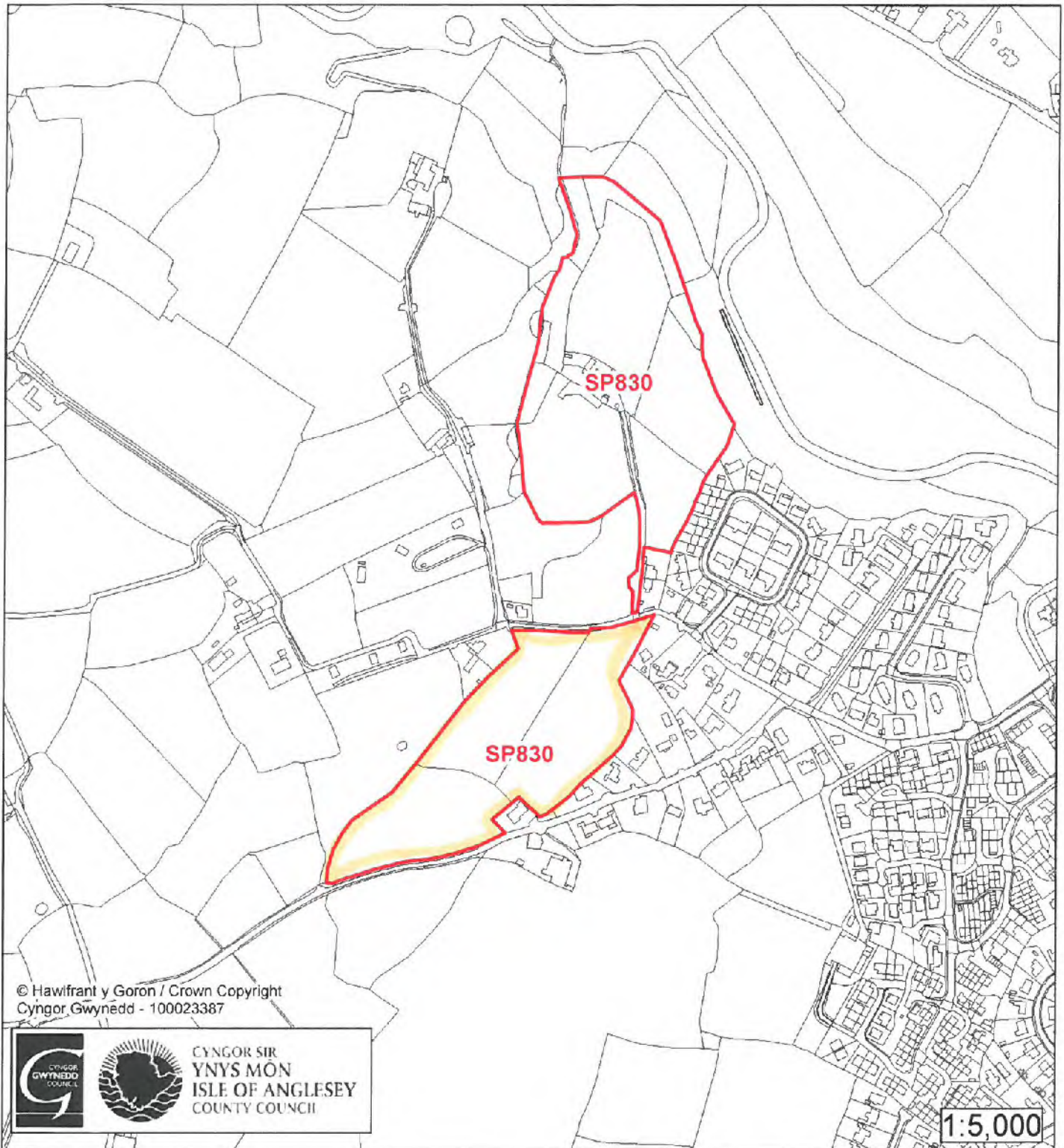
3

☐

4

☐

Cynllun Datblygu Lleol ar y Cyd
Joint Local Development Plan
Cofrestr Safle Posib / Candidate Site Register



Cyfeirnod/ Reference	: SP830
Enw'r Safle / Site Name	: Tir yn / Land at Hen Dy Farm
Lleoliad / Location	: Abersoch
Cyfeirnod Grid / Grid Reference	: 305 282
Maint (ha) / Size (ha)	: 7.70
Defnydd â Awgrymir / Suggested Use	: Cymysg / Mixed



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

Date acknowledged:

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

Data Protection

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

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

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

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	EMLYN WILLIAMS	✓
Address		
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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	SP 352
Constraints Map	
Appendices (please specify)	

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

Objecting	☒	Supporting	☐
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2c. Please provide details of your representation on the Deposit Plan.

I submit that ^{part of} the land shown on the proposal map under reference SP 352 should be included as land suitable for housing in the future. It is not an encroachment into open countryside but would in fact be infill between already existing housing areas.

The benefits from existing mains services and access to the adjoining highway. It is well sheltered and would not be detrimental to the visual amenity. Development would support local employment and residential needs.

Test of Soundness.

C&Z. The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives.

Please use additional sheet if necessary.
Please state how many additional sheets have been used.....

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

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

Extend development boundary to include land as shown on the attached 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	☐	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.

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:

*Sustainability Appraisal Summary
Plan.*

Signed: _____

Dated: *28-3-2015*

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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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.

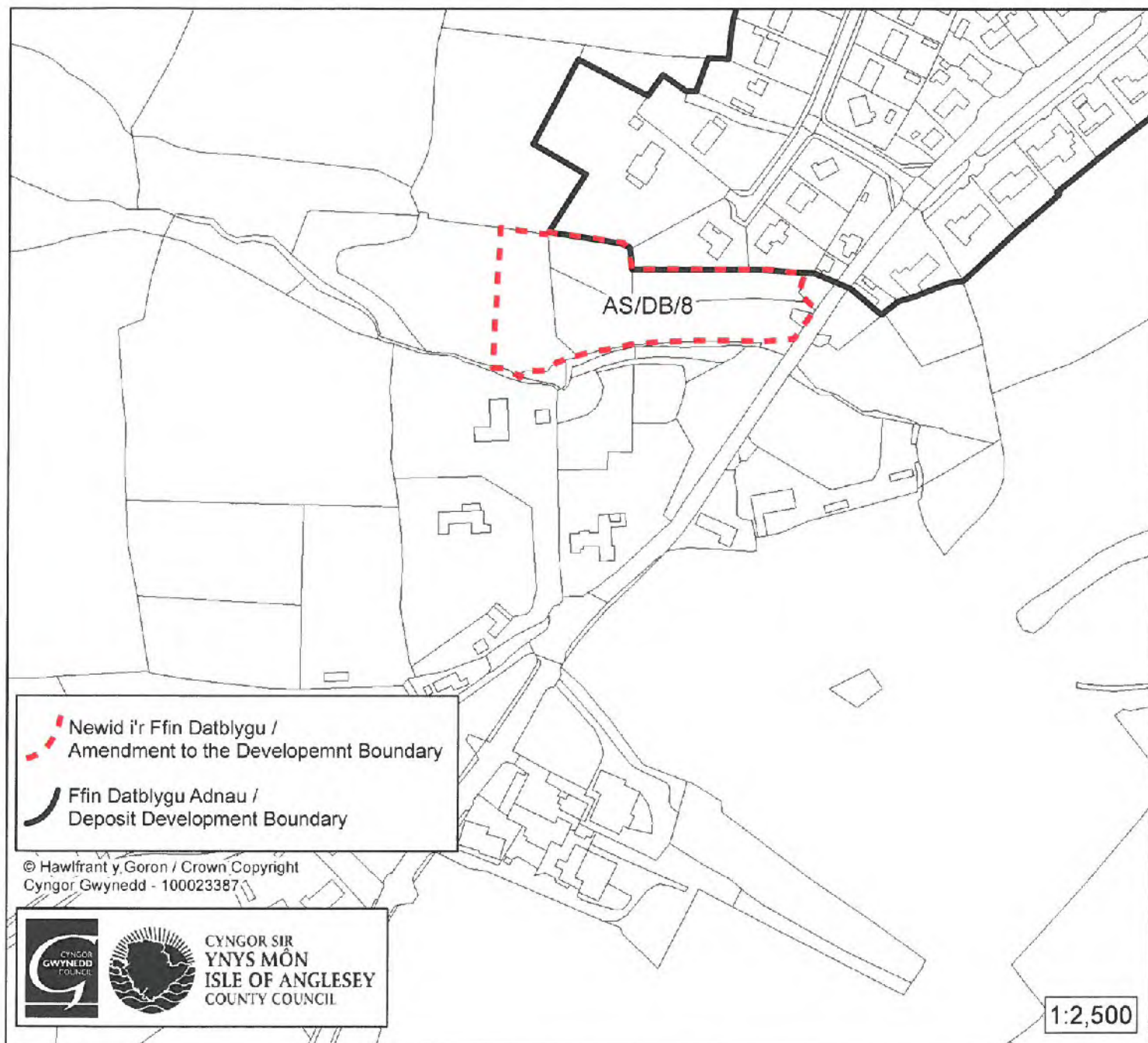
Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which 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.

Sustainability Appraisal Matrix

Site Name:		
Site Area:		
SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)		
2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)		
3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)		
4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)	✓	Development would encourage local residents to stay in their home area.
5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)		
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities (SEA Topic: Population)	✓	Local trade and employers to benefit from increased population.
7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)	✓	Meet the ever increasing demand for local housing.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes (SEA Topics: landscape)		
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling (SEA Topic: material assets, soil)		
10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)		
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)		

**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/8

Enw'r Safle / Site Name: Tir ger / Land adj Llwyn Onn

Lleoliad / Location: Abersoch

Cyngor Cymuned / Community Council: Llanengan

Maint (ha) / Size (ha): 0.58

EXISTING
ACCESS

1:2,500