Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: 102 Enw / Name: Cyngor Tref Biwmares (Prof TW Ashenden) [1267] Rhan: POLISI TAI15 Section: POLICY TAI15

Math / Type: Gwrthwynebu / Object

Crynodeb o'r Sylw:

CYNYDDU DYRANIAD TAI YM MIWMARES A LLAN-FAES Ni roddwyd digon o bwys i rôl ardal Biwmares fel maestref Bangor. Caiff galwadau ar dai ym Mangor eu gyrru gan lwyddiant economaidd Bangor a choridor yr A55 i'r dwyrain. O'r herwydd, mae'r glorian o ran dynodi tai rhwng canolfannau Caergybi, Llangefni, Amlwch a Biwmares yn gogwyddo'n amhriodol o blaid Caergybi, Llangefni and Amlwch gyda chanlyniad y bydd y sefyllfa bresennol o brinder tai ym Miwmares yn gwaethygu. Dylid dyrannu mwy o dai i ardal Biwmares/Llan-faes.Dylai ychydig o'r dynodiadau tai ar gyfer caergybi, Llangefni ac Amlwch gael ei ailddosbarthu i Biwmares.

Representation Summary:

INCREASE ALLOCATION OF HOUSING IN BEAUMARIS AND LLANFAES

Insufficient weight has been given to the role of the Beaumaris area as a suburb of Bangor. Demands on housing in Bangor are driven by the economic success of Bangor and the A55 corridor to the east. As a result the balance of housing allocation between the centres of Holyhead, Llangefni and Amlwch and Beaumaris inappropriately favours Holyhead, Llangefni and Amlwch with a result that the current shortage of affordable housing in Beaumaris will be made worse. A greater allocation of housing should be made to the Beaumaris/Llanfaes area.

Some of the allocation of new housing to Holyhead, Llangefni and Amlwch should be redirected to Beaumaris.

Sylw Llawn / Full Representation:

INCREASE ALLOCATION OF NEW HOUSING IN THE BEAUMARIS AND LLANFAES AREA

Beaumaris is part of a larger developed area which includes Bangor, Llanfairpwll, Menai Bridge and Llandegfan. The housing allocation in Beaumaris should also be influenced by the needs of Bangor which has been identified as the most important urban centre in the plan area.

Much of the expected housing growth on Anglesey has been allocated to Holyhead. Holyhead however has the highest level of approved units that are unlikely to be built (268 out of 600). This is an indication that the demand for housing in Holyhead is weak. It is appropriate that housing and other development be directed at areas where re-development needs to be encouraged. However, due weight should also be given to the economic reality that developers will want to develop where there is a demand. Housing development should therefore also be allocated to areas where development is likely to happen.

Beaumaris and the other Menai Strait communities serve as a residential area for the A55 corridor with commuters travelling to the Llandudno Junction area and further afield.

The functioning of the Bangor catchment area as an important regional hub is recognised by the Wales Spatial Plan. This implies that Beaumaris (which is included in that regional hub) deserves an allocation of housing somewhat higher than it position in the settlement hierarchy would suggest

Apart from WylfaB and tourism, it is most likely that economic development will happen around Bangor and the mainland section of the A55 corridor not Anglesey. Recently chicken processing job losses were announced on Anglesey in the same week as a new chicken processing unit was announced in the Wrexham area. This illustrates how the relative geographic remoteness of Anglesey means that any

Sylwadau Dros y We / Representations via the Internet

industry not serving the local market is vulnerable. On the other hand big employers in the Bangor area such as the University and the Hospital are more secure and have many employees who might be expected to seek accommodation in more 'suburban' areas.

The current allocation of housing does little to tackle the very real problem of lack of affordable housing in Beaumaris. The scale of the problem was identified in the 2013 report by the Anglesey Rural Housing Enabler. The allocation of additional housing development to Beaumaris will help address the problem and, combined with local market policy (TAI5) of the plan, will also help to counter the ongoing loss of accommodation to holiday homes and lets.

There are opportunities for increased allocation of housing to Beaumaris/Llanfaes. In particular the Lairds site is a brownfield site which would benefit from development, particularly a mixed employment and housing development.

Test of soundness

In respect of the Housing allocation to Beaumaris the plan fails the following Tests of Soundness:

C3 It does not have regard to the Wales Spatial Plan

The Wales Spatial Plan recognises the importance of the cluster of towns located either side of the Menai Straits (The Menai Hub) as a focal point for economic activity. To be properly compatible with the Spatial Plan the housing allocation to Beaumaris should therefore recognise Beaumaris's position within the Menai Hub compared to Amlwch say which, along with Beaumaris, is identified as a key settlement within the spatial plan but is outside the two hub areas identified in the Spatial Plan.

CE2 The strategy, policy and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

The proposed plan does not sufficiently recognise the reality of economic activity in North Wales. Other than agriculture and tourism, The Bangor Hub and the A55 corridor (for example around Llandudno Junction) are the current economic powerhouses of the region. While there is a case for attempting to build on Holyhead's position as a major gateway to Ireland, the evidence suggests that most new or expanded economic activity will coalesce around Bangor. The housing allocation needs to reflect this reality. The deposit plan states that a high proportion of already approved housing units in Holyhead are unlikely to be built. If there is already insufficient demand for housing in Holyhead the allocation of yet further units to Holyhead is irrational.

CE4 It is not reasonably flexible to enable it to deal with changing circumstances

The Town Council recognises the importance of encouraging economic development as part of a regeneration strategy. It also recognises the important potential of the Wylfa Newydd development. Clearly provision has to be made for the success of these projects. However the plan must not put all its eggs in one basket. For example the completion of Wylfa B is by no means certain and is dependent on many national and global factors outside the control of local government. By concentrating opportunities for housing development around Holyhead, Llangefni and Amlwch insufficient flexibility has been provided should the proposed developments fail to materialise and economic activity continues to concentrate around Bangor and the A55 corridor.

Newid(iadau) i'r Cynllun

Some of the allocation of new housing to Holyhead, Llangefni and Amlwch should be redirected to Beaumari

Change(s) to the Plan

Some of the allocation of new housing to Holyhead, Llangefni and Amlwch should be redirected to Beaumaris.



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.

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PART 1: Contact details	four details/ four client's details	Agent's details (il relevant)
Name		
Address	Beaumaris Town Council	
Postcode		
Telephone Number		
Email address		

PART 1: Contact details Your details/ Your client's details

Agent's details (if relevant)

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

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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 Section1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

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

2a. Which part of the Deposit Plan are you commenting on?Policy number (please specify)Paragraph number (please specify)Proposals/ Inset Map (please specify ref no.)Inset 9 BeaumarisConstraints MapAppendices (please specify)

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

х

Objecting

Supporting

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

- 1. The Town Centre of Beaumaris marked on this map does not properly represent the actual town centre area of the town and in particular omits part of the retail core of Beaumaris.
- 2. The Protected Open Space and Play Area marked at Happy Valley omits part of the relevant area. The Bowling Green, which is available for use by the public, has been omitted from the area marked.

It is important that these areas are correctly identified in the Deposit Plan.

- 1. A vibrant Town Centre is important for the economic well being of Beaumaris. Correct identification of the core town centre and in particular the retail elements of the core area is important so that it can be protected against loss, in particular of retail premises. Beaumaris has been identified in the plan as a local service centre/local retail centre. Any loss of retail premises or other services in the town centre will undermine the town's position in the plan.
- 2. Beaumaris is an important tourism destination on Anglesey. Open areas and play areas are an important service for the tourist economy. Facilities for both informal recreation (swings, out door play) and more formal recreation (bowling, putting ec) are an important part of the tourism offer. The bowling green therefore needs to be identified as a open space/play area so that its ability to service tourism in the town can be secured. The Bowling Green is a public facility. Though it is used for matches by the local Bowling Club it is also used daily by visitors who can hire equipment on site.

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).

The Town Centre of Beaumaris marked on this map does not properly represent the actual town centre area of the town. The Protected Open Space and Play Area marked at Happy Valley omits part of the relevant area.

It is important that these areas are correctly identified in the Deposit Plan so that Beaumaris's position as a local service centre and important tourism destination can be secured by the plan.

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

Amend the marked areas on the map as shown in Green and Mauve on the map below.

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2dd	. Is th	ie De	posit	: Plan	soun	d?													
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P1		P2		C1		C2		C3		C4		CE		CE		CE		CE	
												1		2		3		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.	X

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.

The Town Council will wish to present both requested changes to the Inspector. The Town Council wants to ensure that the Inspector understands the importance of correctly identifying these areas and to be able to respond to any queries.

3c. Would you like to be informed about the following (Please tick the relevant boxes)						
Submission of documents and evidence to the examination	X					
Publish Inspector's report X						
Plan's adoption	X					
If additional documents have been provided to support your represe	ntations, please list below:					

	Dated: 26 March 2015
Signed:	

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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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

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
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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.

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name		
Address	WELSH WATER	
÷		
Postcode		
Telephone Number		
Email address		

Guidance Note.

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Policy number (please specify)	TALIS	HOUSING IN LOCAR SERVICE						
Paragraph number (please specify)		CENTRES						
Proposals/ Inset Map (please specify ref no.)								
Constraints Map								
Appendices (please specify)								

2b. Are you objec	ting or supporting th	ne Deposit Plan?		
Objecting	Г	Supporting	Г	

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

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

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elevant boxes)
P
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Signed:

Dated:

15

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Test of Soundness

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TAI15 HOUSING IN LOCAL SERVICE CENTRES

(i) ALLOCATIONS

T32 Casita, Beaumaris

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

T33 Adjoining Wendon, Benllech

- A water supply can be provided to serve this site.
- Potential developers need to be aware that the site is crossed by a sewer and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the housing density achievable on site.
- Benllech Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T34 Land near Llwyn Angharad, Bodedern

- A water supply can be provided to serve this site.
- The public sewerage network can accept the potential foul flows from the proposed development site.
- Bodedern Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T35 Land to rear of Holyhead Road, Cemaes

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

T36 Land near Bryn Eira, Llanfairpwll

- Potential developers need to be aware that this site is crossed by a water main and protection measures in the form of easement widths or a diversion of the pipe would be required, which may impact upon the density achievable on site.
- Off-site sewers would be required to connect to the public sewerage network. These can be provided through the sewer requisition scheme under Sections 98-101 of the Water Industry Act 1991
- Llanfairpwll Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

T37 Land near Penmynydd Road, Llanfairpwll

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

T38 Ty Mawr, Porthaethwy

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

T39 Tyddyn Mostyn, Porthaethwy

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

T40 Land near Lon Gamfa, Porthaethwy

• A water supply can be provided to serve this site.