

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
<b>CPRW 26 Bethesda Housing Sites/Boundaries</b>	
Policy number <i>(please specify)</i>	
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	Map 21
Constraints Map	
Appendices <i>(please specify)</i>	

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

**26. Bethesda Housing Sites/Boundaries**

**26.1 Bethesda.** We are surprised that no new housing sites are proposed in Bethesda, although several large sites were proposed in the Candidate Sites Register, while 82 houses are projected to be met through unspecified ‘windfall’ applications. The GUDP site Nr Maes Coetmor, which we understand has been consented, is not shown on the map and is outside the development boundary shown. We did not consider that a suitable site because of the density proposed, and because of the inadequate access, and we would oppose any further extension of housing (SP633) to the green open fields to the north, comprising high quality agricultural land, which would contribute to ribbon development along the A5. We would support housing on a number of centrally situated brownfield sites (279/664/410/280) within easy access of the main road and town services, subject to resolution of any flooding problems. We have no objection to the site identified in Rachub (T66).

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

Why no new housing sites? Why is GUDP site excluded from boundary?

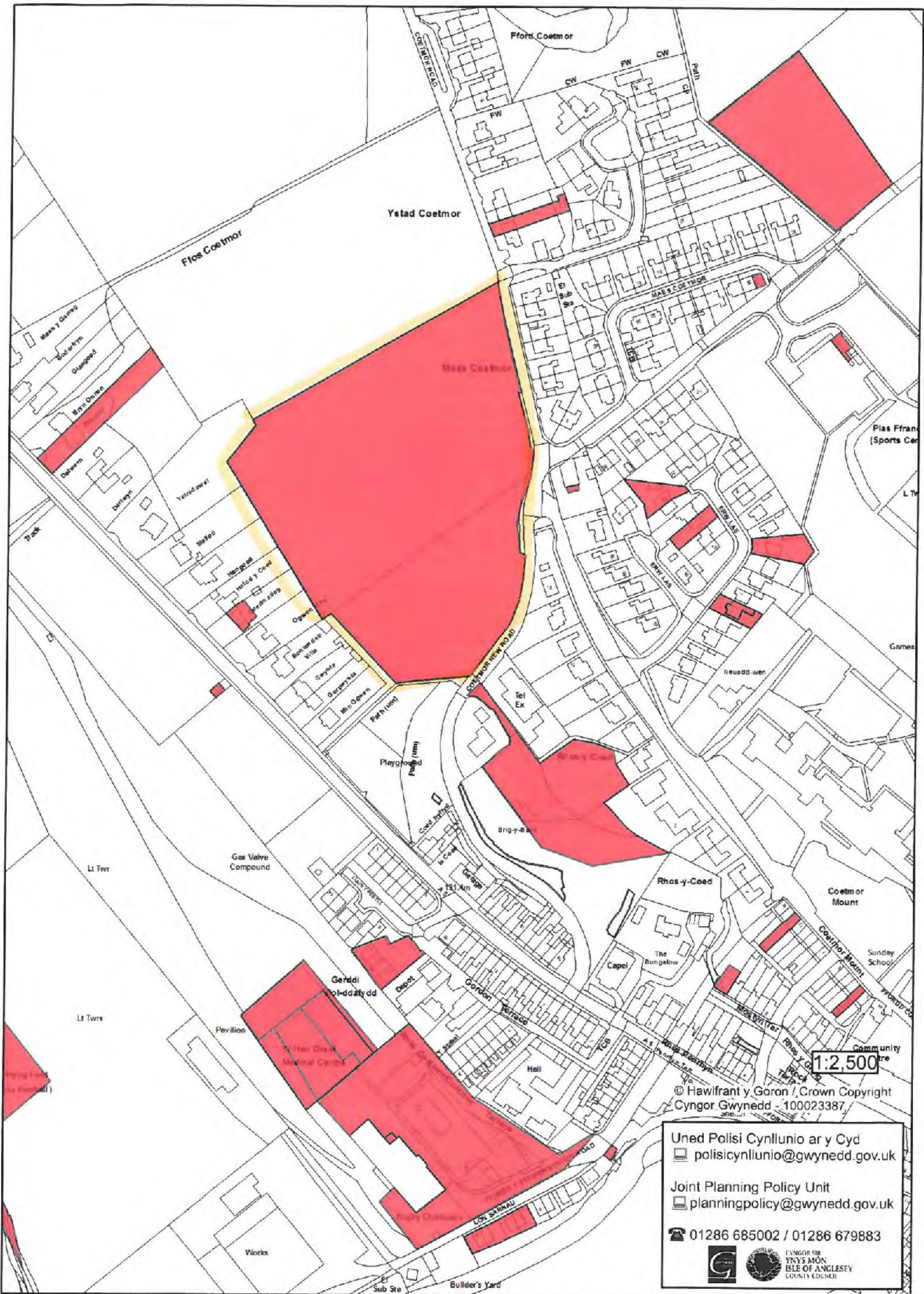
**2d. Please detail the changes you wish to see made to the Deposit Plan.**

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

Yes  No

**2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.**

Procedural				Consistency				Coherence & Effectiveness										
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4



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 Cyngor Gwynedd - 100023387

Uned Polisi Cynllunio ar y Cyd  
 ✉ [polisicynllunio@gwynedd.gov.uk](mailto:polisicynllunio@gwynedd.gov.uk)

Joint Planning Policy Unit  
 ✉ [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

☎ 01286 685002 / 01286 679883



CYNGOR SIR  
 YNYS MÔN  
 ISLE OF ANGLESEY  
 COUNTY COUNCIL

AS/N/84

		<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 31/3/18 <i>etc</i></p> <p>Date acknowledged:</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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.**

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

**PART 1: Contact details**

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

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number <i>(please specify)</i>	PS15 / TAI15
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	Inset Map 21
Constraints Map	
Appendices <i>(please specify)</i>	

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

<b>2c. Please provide details of your representation on the Deposit Plan.</b>
Please see attached document.

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

The existing land bank and windfall sites within the Bethesda development boundary are insufficient to meet the indicative level of growth.  
The development boundary should be re-drawn to include the Land adj Maes Coetmor site which was within the UDP boundary.

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

A wider development boundary to meet the indicative level of growth for Bethesda. In particular the boundary should include the Land adj Maes Coetmor site.

**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 Bethesda (Map Inset 21).

**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"/>
<b>If additional documents have been provided to support your representations, please list below:</b>	
Supporting Statement	
Signed: 	Dated: 31/3/2015

**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**

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

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

**ONLINE** – By completing the electronic form at [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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

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

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

## Test of Soundness

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

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

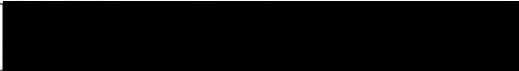
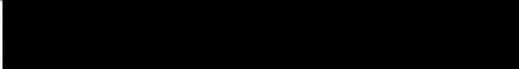
Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which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



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

**DEPOSIT PLAN (2015)  
PUBLIC CONSULTATION  
RESPONSE**

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<b>Title:</b>	Bethesda
<b>Client:</b>	RCH Douglas Pennant
<b>Agent:</b>	Charlene Sussums-Lewis Chris Bell
<b>Contact:</b>	
<b>Email:</b>	

## 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, **Bethesda** is classified as a **Local Service Centre**. The plan states in Paragraph 6.15 that *'new housing allocations are only identified in the Sub regional Centre, Urban and Local Service Centres and Service Villages and only if the existing land bank and windfall sites cannot accommodate their indicative level of growth'*.

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 housing development in **Local Service Centres** will be 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. Policy **TAI15** sets out the housing allocations and indicative windfall for **Local Service Centres**.

3.4. In terms of housing numbers, **Bethesda** has no housing allocation as it is considered that sufficient opportunities exist to support the anticipated growth level of 99. The indicative windfall provision is **82** dwellings over the plan period (2011 – 2026). In the past 3 years there have only been 3 applications for larger residential developments. A development of 24 units was approved on appeal (reference: APP/Q6810/A/14/2215839) and applications for developments of 37 and 69 units remain undetermined (application references: C13/0036/13/AM and C13/0412/13/AM respectively). The latter site, plus 8 others from Topic Paper 1A: Assessing the Candidate Sites, are all outside of the development boundary. The former Austin Taylor site is within the development boundary but it is constrained by flood risk.

3.5. It is difficult to see how the anticipated growth in Bethesda will be accommodated with so few sites within the development boundary. We particularly wish to challenge the re-drawing of the development boundary as the site of our client's application, Land adj Maes Coetmor (application reference: C13/0412/13/AM), was within the UDP development boundary but it is not within the Deposit Plan boundary.

#### 4. Conclusion

4.1. We do not believe that there is a sufficient existing land bank and windfall sites within the **Bethesda** development boundary to meet the indicative level of growth. A wider settlement boundary should be drawn to include the Land adj Maes Coetmor site which was within the UDP development boundary.

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

## DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

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**Title:** Land at Maes Coetmor, Bethesda

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**Client:** RCH Douglas Pennant

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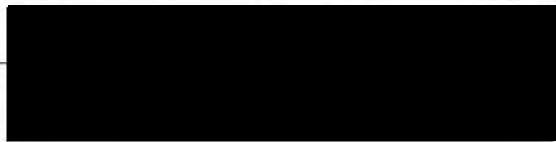
**Agent:** Charlene Sussums-Lewis  
Chris Bell

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**Contact:**

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**Email:**



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- 3.5. It is difficult to see how the anticipated growth in Bethesda will be accommodated with so few sites within the development boundary. We particularly wish to challenge the re-drawing of the development boundary as the site of our client's application, Land adj Maes Coetmor (application reference: C13/0412/13/AM), was within the UDP development boundary but it is not within the Deposit Plan boundary.

#### **4. Site Detail – Maes Coetmor**

- 4.1. The site is allocated for residential development in the Gwynedd Unitary Development Plan and consists of 1.95 hectares of Greenfield within the settlement of Bethesda. Surrounding land uses are predominately residential, with a wide range of services within Bethesda.
- 4.2. An outline application for 69 residential units (20 of which are allocated as affordable housing for local need) has been submitted to Gwynedd Council (application reference: C13/0412/13/AM), with all detailed matters reserved for approval.
- 4.3. The proposal would result in the creation of a quality development in a sustainable location. It is within close proximity of a range of community facilities and has excellent access to jobs and key services.
- 4.4. The proposal is supported by Planning Policy Wales Paragraph 9, TAN 2 and the Gwynedd Unitary Development Plan CH1 and B4.

## 5. Site Assessment

<b>CRITERIA</b>	<b>SITE DETAILS &amp; COMPLIANCE</b>
Site Ref	<b>Site Adj to Maes Coetmor</b>
Settlement	<b>Bethesda</b>
Proposal	Residential Development
Current Use	Agriculture
Area	Circa 1.95 ha
Density	30 dwellings per hectare
Approx Total Yield	69 dwelling (20 affordable)
<b>HIERARCHY OF SETTLEMENTS</b>	
Located within Settlement Boundary Limit	Site allocated in existing Gwynedd UDP and within settlement boundary
Previously Developed Land	No
<b>ACCESS TO KEY SERVICES</b>	
Distance to Post Office	900m
Convenience Store	900m
Primary School	1km
Secondary School	500m
Supermarket	10km
Doctors Surgery	750m
Pharmacy	500m
Dentist	850m
<b>CONSTRAINTS AND DELIVERABILITY</b>	
<b>ENVIRONMENTAL CONSTRAINTS</b>	

Impact of landscape and countryside	No – settlement developed to the North, East and South of Site. Existing stone walls provide clear definitive boundary to the West.
Impact on local village character	No – opportunity to enhance area
Impact on views	No – site within development boundary
Impact on Biodiversity	No – Opportunity to increase biodiversity as currently used for agriculture.
Impact on Historic Environment	No
<b>PHYSICAL CONSTRAINTS</b>	
Flood Risk	No
Ownership	Private ownership
Ground Conditions	Relatively level site capable for development
Archaeology	None known.
Highways	Access satisfactory and confirmed by Highways
Availability	Available for development and deliverable within plan period.

## 6. Site Justification

6.1. A planning application for the Site was submitted to Gwynedd Council in 2013. The application is yet to be determined and as such, it is appropriate for the Site to be included in the JLDP. Once planning is obtained, the Site will be built out and it is being actively promoted.

6.2. The Site promotes 'Positive Planning'. The Site is under single ownership which allows for effective disposal and deliverability. The allocation of The Site for residential development allows for positive planning in accordance with National Planning Policy as The Site is available, and deliverable.



6.2.1. The allocation of the Site is in accordance with the Deposit LDP Strategy and also in accordance with the Sustainability Appraisal (See Section 7).

## 7. Sustainability Appraisal

Site Name: **Land at Maes Coetmor, Bethesda**

Site Area: **1.95 Ha**

SA Objective	Assessment	Summary
<p><b>1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)</b></p>	+	<p>The Site will contribute towards this SA Objective because The Site is not within a protected area and the development of The Site will not lead to adverse impacts regarding contamination. The development of The Site can include for enhancement of biodiversity with the planting of trees and hedges where appropriate. The proposed layout also respects the existing biodiversity on site by retaining an area of open space.</p> <p>The site is currently agricultural with little benefit to wildlife. It is hoped that the development of open space provision and occupiers gardens will be of benefit to the environment.</p>
<p><b>2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)</b></p>	++	<p>The Site will contribute towards this SA Objective because The Site is on the edge of the settlement and will provide for the opportunity of new housing stock designed and built to good sustainable modern standards.</p> <p>Development of the site would ensure that local services and facilities are supported.</p> <p>The site would enable local people to remain living in their local area by providing a mix of housing sizes and tenure.</p> <p>The site will support children, young people, working age and retired people through the mix in housing sizes and tenure.</p>
<p><b>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and</b></p>	++	<p>The Site will contribute towards this SA Objective because The Site will provide for modern housing with high insulation and efficiency levels resulting in low emissions and heat/energy losses. The Site can also utilise renewable energy sources.</p>

adaptation measures ( <i>SEA Topics: climatic factors, air</i> )		
4. Conserve, promote and enhance the Welsh language ( <i>SEA Topic: cultural heritage</i> )	++	The Site will contribute towards this SA Objective because The Site is on the edge of the development boundary and will offer accommodation suitable for all.
5. Conserve, promote and enhance cultural resources and historic heritage assets ( <i>SEA Topic: cultural heritage</i> )	++	The Site will contribute towards this SA Objective because The Site will not have an adverse impact on historic or cultural heritage upon development.
6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities ( <i>SEA Topic: Population</i> )	+	The Site will contribute towards this SA Objective because The Site will offer employment opportunities during the construction process and it will also offer good quality new housing stock that may encourage people to stay in the area and work locally, which will further strengthen the local economy.
7. Provide good quality housing, including affordable housing that meets local needs ( <i>SEA Topic: population, human health</i> )	++	The Site will contribute towards this SA Objective because The Site will be built out to modern building regulation standards to allow for energy efficient modern housing.
8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes ( <i>SEA Topics: landscape</i> )	++	The Site will contribute towards this SA Objective because The Site is located on the edge of the settlement and would allow for good quality design in keeping with the surrounding area.
9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling ( <i>SEA Topic: material assets,</i>	++	The Site will contribute towards this SA Objective because The Site would incorporate recycling and sustainable drainage solutions at the Full Planning Application stage.

<i>soil)</i>		
<b>10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)</b>	++	The Site will contribute towards this SA Objective because the development of The Site would allow for additional customers to use the existing facilities and bus service which will further strengthen its viability for future operation.
<b>11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)</b>	++	The Site will contribute towards this SA Objective because The Site is not within an area liable to flooding and sustainable drainage solutions would be incorporated at the Full Planning Application Stage.

### Key

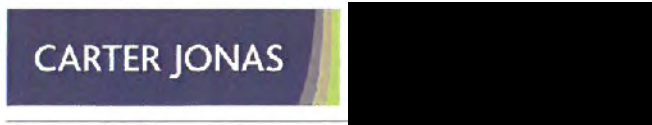
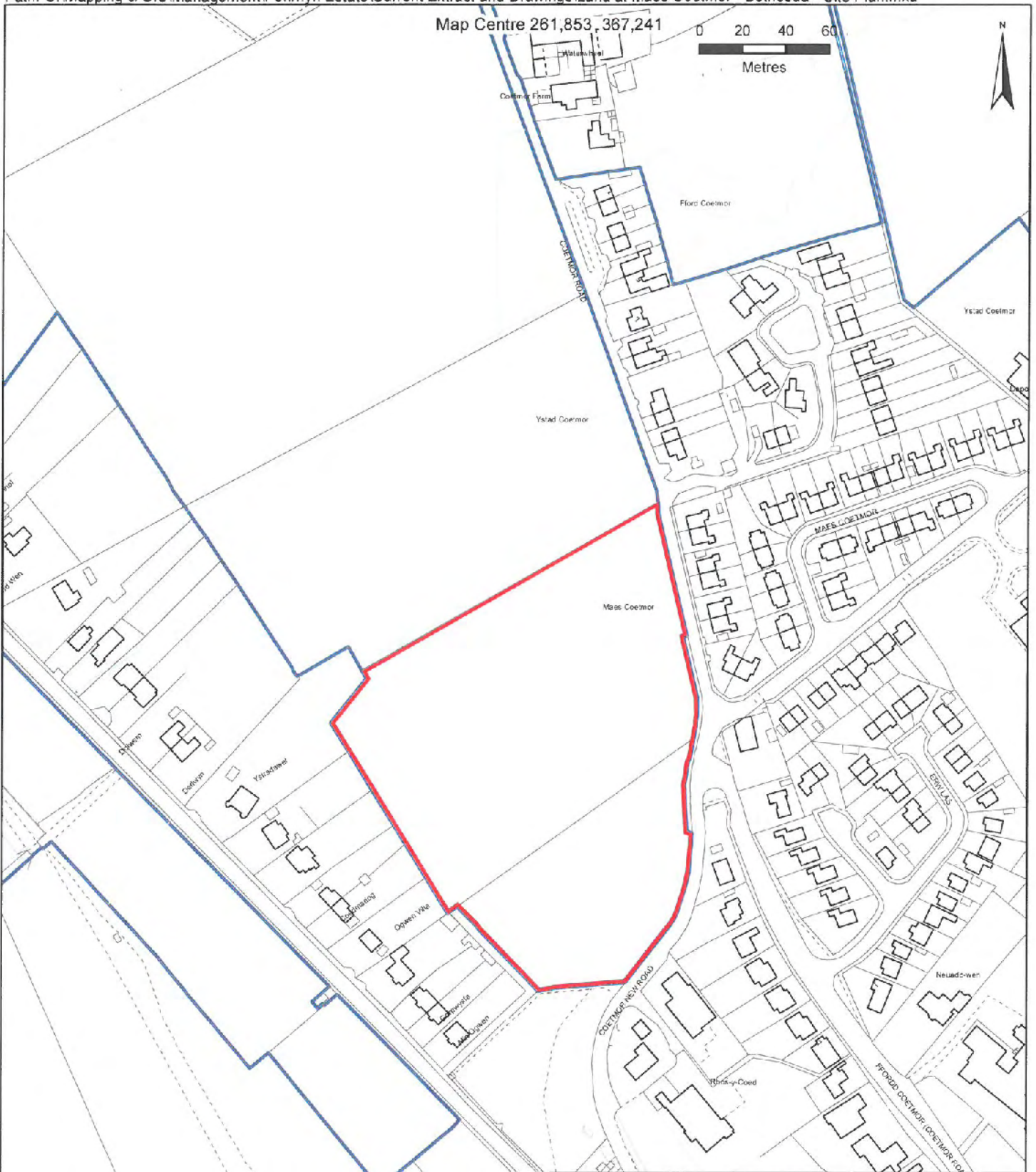
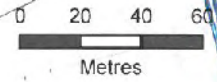
++	Development actively encouraged as it would resolve an existing sustainability problem	+/-	Potential sustainability issues; mitigation and / or negotiation possible
+	No sustainability constraints and development acceptable	-	Problematical and improbable because of known sustainability issues; mitigation or negotiation difficult and / or expensive
0	Neutral	--	Absolute sustainability constraints
?	Unknown/uncertain effect		

## 8. Conclusion

8.1. We do not believe that there is a sufficient existing land bank and windfall sites within the **Bethesda** development boundary to meet the indicative level of growth. A wider settlement boundary should be drawn to include the Land adj Maes Coetmor which is within the existing UDP development boundary.



Map Centre 261,853, 367,241



Client: **Mr Douglas-Pennant**  
Project: **Land at Maes Coetmor - Bethesda**  
Title: **Site Plan**

Scale: 1:2500 @A4 Date: 16 Apr 13  
Drawn By: mfrance Dwg no: **SH16995/13/01**