



Paragraph 10.8 of TAN15 clearly states that sites in flood zone C2 should not be allocated for highly vulnerable development.

NRW recommends that either a stage 2 or stage 3 SFCA is prepared and forwarded to NRW for further assessment to demonstrate that developing this site for residential use would comply with the requirements of TAN15 or that this allocation is removed from the Local Development Plan.

Please refer to our representation ID 104 for further details with regards to our objection to allocating this site for development.

Should your Authority opt to undertake a Stage Two/Three Strategic Flood Consequence Assessment NRW would be willing to advise your Authority on the likelihood of the above sites satisfying the criteria for development within a flood plain in terms of depths and velocity of flood waters.

However, we remind you that as TAN15 states that highly vulnerable development should not be considered within Zone C2, (the former Crosville site), the Welsh Government appointed Planning Inspector may consider the Plan to be unsound on Policy grounds alone.

NRW also wishes to provide the following advice with regards to sites T42 and C8.

1085  
T42 – Land near North Terrace, Criccieth – Is proposed for housing under Policy TAI15. Although, the site is not identified as being within a flood risk zone, NRW is aware of a history of flooding from the Afon Cwrt which flows through the site. The river enters a culvert at the bottom of the site, and any blockage of the screen could increase flood risk. Due to the steep nature of the land, it is unlikely that flooding would affect a large proportion of the site. However, NRW would expect any planning application to be supported by a Flood Consequence Assessment to ensure that development is adequately protected.

C8 – Business Park, Porthmadog – Is proposed for employment under Policy CYF1. The whole site is within flood zone C1. However, flood modelling work suggests that the actual risk to the site is low due to the flood defences within the area. NRW would expect any planning application to be supported by a Flood Consequence Assessment to ensure that development is adequately protected.

### **Sewerage Infrastructure Capacity**

Paragraph 7.1.13 of the Deposit Plan notes that engagement with Dwr Cymru/Welsh Water has been undertaken through Plan preparation process. NRW is aware that there may be capacity issues with Treborth Waste Water Treatment Works that serves Bangor, Y Felinheli, Bethel, and an area of south Anglesey. This may

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

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

**Data Protection**

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

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

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

**PART 1: Contact details**

|                  | Your details/ Your client's details | Agent's details (if relevant) |
|------------------|-------------------------------------|-------------------------------|
| Name             | [REDACTED]                          |                               |
| Address          | WELSH WATER<br>[REDACTED]           |                               |
| Postcode         | [REDACTED]                          |                               |
| Telephone Number | [REDACTED]                          |                               |
| Email address    | [REDACTED]                          |                               |

### Guidance Note.

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

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

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

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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

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

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

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

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

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

|  |  |
|--|--|
| <b>2a. Which part of the Deposit Plan are you commenting on?</b> |  |
| Policy number (please specify)                                   | TAI IS HOUSING IN LOCAL SERVICE CENTRES. |
| Paragraph number (please specify)                                |  |
| Proposals/ Inset Map (please specify ref no.)                    |  |
| Constraints Map  |  |
| Appendices (please specify)                                      |  |

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

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

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

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

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

|     |                          |    |                          |
|-----|--------------------------|----|--------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
|-----|--------------------------|----|--------------------------|

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

| Procedural |                          |    |                          | Consistency |                          |    |                          |    |                          |    |                          | Coherence & Effectiveness |                          |      |                          |      |                          |      |                          |
|------------|--------------------------|----|--------------------------|-------------|--------------------------|----|--------------------------|----|--------------------------|----|--------------------------|---------------------------|--------------------------|------|--------------------------|------|--------------------------|------|--------------------------|
| P1         | <input type="checkbox"/> | P2 | <input type="checkbox"/> | C1          | <input type="checkbox"/> | C2 | <input type="checkbox"/> | C3 | <input type="checkbox"/> | C4 | <input type="checkbox"/> | CE 1                      | <input type="checkbox"/> | CE 2 | <input 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.**

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



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

Signed:



Dated:

31/3/15.

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

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

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

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

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

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

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

## Test of Soundness

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

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

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

- The public sewerage network can accept the potential foul flows from the proposed development site.
- The proposed growth being promoted within the catchment area of Treborth WwTW would require improvements at the treatment works which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

**T41 Former Cattle Market Site, Valley**

- 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.
- Holyhead Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figures.

**T42 Land near North Terrace, Criccieth**

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

**T43 Land near Victoria Hotel, Llanberis**

- 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.
- Llanberis Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

**T44 Land near Ty Du Road, Llanberis**

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

**T45 Church Field, Llanrug**

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

**T46 Land near Rhuthallt Road, Llanrug**

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

**T47 Land near Helyg, Nefyn**

- A water supply can be provided to serve this site.
- There are isolated incidents of flooding in the public sewerage system that will need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- Nefyn Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

**T48 Former Allotments, Nefyn**

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