



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	Cadnant Planning Ltd	Cadnant Planning Ltd
Address		<div></div> <div></div> <div></div> <div></div>
Postcode		<div></div>
Telephone Number		<div></div>
Email address		<div></div>

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

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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 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 <i>(please specify)</i>	TAI17, TAI9, PS15
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

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

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

Policy TAI17: Housing in Local, Rural and Coastal Villages states that

“Proposals for housing in the following Local, Rural and Coastal Villages will be granted provided they conform to all the following criteria:

- 1. The proposal would satisfy the community need for housing or local need affordable housing;*
- 2. The proposal would help to secure the viability of the local community, and strengthen the community and linguistic character;*
- 3. The growth level is based on the indicative level included in table 20 and is consistent with Strategic Policy PS15.”*

There is an emphasis within Planning Policy Wales in the need to deliver sustainable communities and it is identified that;

“Development plans need to reflect the policy goals of the Wales Spatial Plan. They have a major role in setting out the vision for sustainable communities in Wales.”

People, Places, Future The Wales Spatial Plan emphasises that;

“Our future depends on the vitality of our communities as attractive places to live and work. We need to reduce inequalities between communities whilst retaining their character and distinctiveness.”

One of the main challenges rural communities face is deprivation. It is vital that rural communities’ vitality and attractiveness is sustained and enhanced. It is acknowledged within paragraph 10.3 of The Wales Spatial Plan that;

“Regeneration is an important driver for local development. This means co-ordinating activities and investment relating to transport, skills and employment, housing and inward investment. Regeneration proposals for an area must align different investment streams to secure joined-up delivery at a local level.”

Please use additional sheet if necessary.

Please state how many additional sheets have been used...2

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

It is considered that providing only affordable housing within Local, Rural and Coastal Villages will weaken communities both socially and economically resulting in an increase in deprivation. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities. Restricting housing development to 100% affordable housing will result in the social imbalance of settlements and therefore contrary to national planning policy.

The strategy of only allowing local need or affordable housing within settlements such as Y Felinheli, Moelfre, Trearddur is also likely to lead to the plan strategy as a whole failing to deliver the required level of housing. The delivery of local need and affordable housing can only be achieved through balanced and viable development which incorporates a mix of open market and affordable housing.

The "local needs" housing in effect duplicates the affordable housing provision and is not necessary or deliverable.

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

This policy should be reviewed and altered to provide a mix of affordable and open market housing within Local, Rural and Coastal Villages.

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	<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.

We wish to test the Council's reasoning for the requirements of Policy TAI17 through discussion and clarification 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:

The continuation of section 2c

Signed:



Dated: 31.03.15

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 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.

The continuation of Section 2c.

In achieving sustainable rural communities and tackling deprivation delivering good quality housing is vital. It is emphasised that there is a need to maintain a mix of tenure and size of housing to ensure communities are adequately balanced. It is identified within paragraph 10.5 of The Wales Spatial Plan that;

“accommodating appropriate development in smaller settlements and rural areas is vital for supporting the development of more rural communities.”

Paragraph 9.1 of Planning Policy Wales highlights the Welsh Government’s approach to housing strategy and states that;

“The Welsh Government’s approach, set out in the National Housing Strategy, is to:

- Provide more housing of the right type and offer more choice;*
- Improve homes and communities, including the energy efficiency of new and existing homes; and*
- Improve housing-related services and support, particularly for vulnerable people and people from minority groups.*

The Welsh Government will seek to ensure that;

- Previously developed land is used in preference to greenfield sites;*
- New housing and residential environments are well designed, meeting national standards for the sustainability of new homes and making a significant contribution to promoting community regeneration and improving the quality of life; and that*
- The overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains and, where practical, enhances important landscape and wildlife features in the development.”*

The importance of housing as an economic driver was made clear by the Minister for Housing and Regeneration in July 2013 when he stated that:

“Building more homes will not only meet growing housing need, but also generate growth and jobs, provide work to help people out of poverty and ameliorate the effects of the bedroom tax. The private and public sectors must be enabled and supported to play a full role in building more homes. I have looked carefully at all the tools available to me, including regulations, policy and funding, and am today announcing a package of measures which together should increase the supply of new homes across Wales. The actions set out in this statement represent the first phase of action in this area and demonstrates the priority I accord to increasing the supply of housing.”

It is considered that only allowing affordable housing within Local, Rural and Coastal Villages will weaken communities both socially and economically resulting in an increase in deprivation. It is identified within National Planning Policy that there is a requirement to provide a mix of affordable and market housing within settlements in order to create and maintain sustainable communities.

It is vital that rural communities’ vitality and attractiveness is sustained and enhanced. Restricting development to affordable housing will have a detrimental effect by deprivation on these communities and on the economy of Anglesey and Gwynedd. It is emphasised within The Wales Spatial Plan that there is a need to maintain a mix of tenure and size of housing to ensure

communities are adequately balanced. Also Paragraph 9.1 of Planning Policy Wales emphasises that the Welsh Government seeks to ensure that there is a mix of affordable and market housing within villages.

Housing development in Anglesey and Gwynedd is vital in sustaining rural economy. Developers experience difficulty in funding developments for 100% affordable homes as they are unviable. Restricting housing development to affordable housing will result in the deprivation of Local, Rural and Coastal Villages. This requirement is unviable and will restrict housing development within these villages as developers will not be able to build 100% affordable housing. This will have a direct detrimental impact on the economy of Anglesey and Gwynedd as housing developers are important economic drivers within the rural economy as they generate growth and jobs by providing work to help people out of poverty.

The strategy of only allowing local need or affordable housing within settlements such as Y Felinheli, Moelfre, Trearddur is also likely to lead to the plan strategy as a whole failing to deliver the required level of housing. The delivery of local need and affordable housing can only be achieved through balanced and viable development which incorporates a mix of open market and affordable housing.

The “local needs” housing in effect duplicates the affordable housing provision and is not necessary or deliverable.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **202**

Enw / Name: **John Brinley Jones [2087]**

Rhan: **7.4.124**

Section: **7.4.124**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Sut cyfrifwyd yr 16 annedd newydd ar gyfer Llanbedrog? Ydi'r ffigwr hwn yn cynnwys yr holl fathau o anheddau newydd gan gynnwys tai haf? Daeth arolwg a gynhaliwyd yn 2007 ar gyfer Cyngor Plwyf Llanbedrog i'r casgliad fod 28 o deuluoedd yn dymuno symud i mewn i'r pentref. Codwyd deg tŷ fforddiadwy ond ymddengys bod y deg hyn eisoes wedi'u cynnwys yn y ffigwr ac mae tri arall sy'n dai haf hefyd wedi'u cynnwys, sy'n gadael un i'w godi yn Llanbedrog yn ystod oes y cynllun, sydd ddim yn ddigon o ystyried y dymunwn weld mwy o dwf yn Llanbedrog. Cynyddu'r niferoedd o 16 i o leiaf 28 a ni ddylai'r ffigwr cynnwys ail cartrefi neu gartrefi gwyliau. Newid tabl 20 mewn perthynas i'r eglurhad ym mharagraff 7.4.124. Efallai lleihau niferoedd ym Mhwllheli o 12 a symud yr angen i Lanbedrog.

Representation Summary:

How was the figure 16 new dwellings for Llanbedrog calculated. Does this figure include all types of new dwellings including holiday homes. A survey conducted in 2007 for Llanbedrog Parish Council concluded that 28 families wanted to move into the village. 10 affordable homes were built but apparently these 10 have already been included in the figure and another 3 that are holiday homes have also been included leaving on 1 to be built in Llanbedrog over the plans lifetime which is not enough considering that we would like to see some more growth in Llanbedrog.

Increase number from 16 to at least 28 and this figure should not include second or holiday homes. Change Table 20 relating to explanation paragraph 7.4.124 - Indicative growth level in coastal villages from 16 to 28 and state figures should not include holiday / second homes. Perhaps reduce dwellings required in Pwllheli by 12 and add them to Llanbedrog.

Sylw Llawn / Full Representation:

How was the figure 16 new dwellings for Llanbedrog calculated. Does this figure include all types of new dwellings including holiday homes. A survey conducted in 2007 for Llanbedrog Parish Council concluded that 28 families wanted to move into the village. 10 affordable homes were built but apparently these 10 have already been included in the figure and another 3 that are holiday homes have also been included leaving on 1 to be built in Llanbedrog over the plans lifetime which is not enough considering that we would like to see some more growth in Llanbedrog.

Newid(iadau) i'r Cynllun

Cynyddu'r niferoedd o 16 i o leiaf 28 a ni ddylai'r ffigwr cynnwys ail cartrefi neu gartrefi gwyliau. Newid tabl

Change(s) to the Plan

Increase number from 16 to at least 28 and this figure should not include second or holiday homes. Change Table 20 relating to explanation paragraph 7.4.124 - Indicative growth level in coastal villages from 16 to 28 and state figures should not include holiday / second homes. Perhaps reduce dwellings required in Pwllheli by 12 and add them to Llanbedrog.

Profion Cadernid / Soundness Tests: None

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 1188, 1189, 1190, 1191 1192, 1193, 1194, 1195, 1196, 1197, 1198, Date received: 23/3/15 1202 Date acknowledged:</p>
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**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	[REDACTED]	
Address	WELSH WATER [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

Guidance Note.

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

Enwan Ilesha (Abiodun 4)

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	TAL 17 HOUSING IN LOCAL, RURAL
Paragraph number (please specify)	+ COASTAL VILLAGES
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>
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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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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:

[Redacted Signature]

Dated:

31/3/15

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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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.
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C3	It does not have regard to the Wales Spatial Plan.
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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.
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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.

TAI17 HOUSING IN LOCAL, RURAL AND COASTAL VILLAGES

- There are no known water supply issues to impact upon the delivery of the growth identified within these settlements, however a full assessment will be made at the time of a planning application once the location of development is known.
- The adequacy of the sewerage network will be assessed at the time of a planning application once the location of development is known. —

ANGLESEY LOCAL VILLAGES

Bethel

- Bethel is served by Malltraeth Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the growth figure allocated for the catchment area.

Bodffordd

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

Bryngwran

- No additional growth is anticipated in Bryngwran as the indicative housing growth is provided for by completed units and the existing landbank.

Brynsiencyn

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

Caergeiliog

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may 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.
- Caergeiliog is served by Holyhead Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

Dwyran

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may 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.
- Dwyran is served by Newborough Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **210**

Enw / Name: **CYNGOR CYMUNED LLANBEDROG (MR JOHN HARRIS)**

Rhan: **7.4.124**

Section: **7.4.124**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

I gynyddu lefel twf Llanbedrog o 16 i 28 uned. Ym 2007 gwnaeth y Cyngor arolwg o'r angen am dai yn Llanbedrog a chanfyddwyd fod angen 28 o dai. Adeiladwyd 12 ty fforddiadwy, mae hyn yn gadael 16 anghenus. Yn y Cynllun nid oes unrhyw ddarpariaeth ar gyfer hyn. Ydi'r ffigwr yma yn cynwys ail gartrefi?

Representation Summary:

To increase the growth level of Llanbedrog from 16 to 28 units. In 2007 the Council undertook a review of the need for housing in Llanbedrog, and it became apparent that there was a need for 28 houses. 12 affordable houses were built, which leaves 16 as destitute. In the Plan there is no provision for this. Does this figure include second homes?

Sylw Llawn / Full Representation:

I gynyddu lefel twf Llanbedrog o 16 i 28 uned. Ym 2007 gwnaeth y Cyngor arolwg o'r angen am dai yn Llanbedrog a chanfyddwyd fod angen 28 o dai. Adeiladwyd 12 ty fforddiadwy, mae hyn yn gadael 16 anghenus. Yn y Cynllun nid oes unrhyw ddarpariaeth ar gyfer hyn. Ydi'r ffigwr yma yn cynwys ail gartrefi?

Newid(iadau) i'r Cynllun

Newid - cynyddu lefel twf Llanbedrog o 16 i isafswm o 28 unedau newydd, a dim or 28 i fod yn dai haf / ail g

Change(s) to the Plan

Change - increase the growth level of Llanbedrog from 16 to a minimum of 28 new units, and for none of the 28 to be holiday homes / second homes.

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **213**

Enw / Name: **CYNGOR CYMUNED LLANBEDROG (MR JOHN HARRIS)**

Rhan: **7.4.124**

Section: **7.4.124**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r cyfyngiadau a roddir ar bentrefi Arfordirol/ gwledig yn rhu gaeth. Mae'n bwysig cael twf. Mae'n bwysig cael twf i warchod cymeriad y pentref, er mwyn galluogi amrywiaeth o dai angen lleol eu hadeiladu a dim o reidrwydd tai fforddiadwy yn unig.

Representation Summary:

The restrictions placed on Coastal/Rural villages are too strict. It is important to have growth. It is important to have growth to safeguard the village's character, in order to enable a variety of local need housing to be built, and not necessarily only affordable housing.

Sylw Llawn / Full Representation:

Mae'r cyfyngiadau a roddir ar bentrefi Arfordirol/ gwledig yn rhu gaeth. Mae'n bwysig cael twf. Mae'n bwysig cael twf i warchod cymeriad y pentref, er mwyn galluogi amrywiaeth o dai angen lleol eu hadeiladu a dim o reidrwydd tai fforddiadwy yn unig.

Newid(iadau) i'r Cynllun

Bydd graddfa datblygiadau arfaethedig y dyfodol yn adlewyrchu anghenion y Pentrefi o ran maint a swyddog

Change(s) to the Plan

The scale of proposed developments in the future will reflect the needs of the Villages in terms of size, function and their functional and physical relations with the front-line Centres. It will also reflect their social character and the status of the housing market. Over the Plan period the same higher level of housing growth will be included within the Service Villages and Coastal Villages. In Coastal Villages, development will be achieved by completing work, commitments, windfall sites and where appropriate, new designations for a combination of market value housing and local need affordable housing.

Profion Cadernid / Soundness Tests: None

REP NO: 709

ID: 2829

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

SUMMARY EMAIL SENT

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	[REDACTED]	Mrs Charlene Sussums-Lewis
Address	c/o Agent	[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]
Email address		[REDACTED]

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

2a. Which part of the Deposit Plan are you commenting on?

Policy number (please specify)	TAI17
Paragraph number (please specify)	7.4.124
Proposals/ Inset Map (please specify ref no.)	Inset 106
Constraints Map	
Appendices (please specify)	

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

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

See attached document

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

The proposed development boundary alteration for include **Site East of A466 (SP678) Llanaelhaearn** is supported for the following reasons:

Deliverability – Positive Planning.
Allocated Housing Numbers
Development Principle
Opportunities and Constraints – As attached at Appendix 1
Indicative Masterplan – As attached at Appendix 2
Positive Sustainability Appraisal

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

Open Market Housing to be permitted in Local/Coastal/Rural Villages:

Policy **TAI17** states that: 'Proposals for housing in the following Local, Rural and Coastal Villages will be granted provided they conform to all the following criteria 1) The proposal would satisfy the community need for housing or local need affordable housing...' **Paragraph 7.4.124** states that: '...housing development will be limited to a scale and type to address community need for housing...No open market housing sites will be allocated in these types of villages...' The Policy in itself is confusing and there is no definition of what 'community need' means to a planning application. For example, a survey maybe carried out prior to a planning application being submitted which shows that there is a 'community need' for 3 bed homes. The developer may proceed with a planning application to address the need for 3 bed homes, but this does not necessarily imply that the homes

will not be sold at Open Market Value as they are not 'Local Need Affordable'.

Policy **TAI10** does not accord to Policy **TAI17** as it allows for proven Local Need Affordable housing to be built on the edge of a settlement's development boundary. The Policy will even allow for a level of open market housing to supplement the viability of the proposal. This in itself is a good scheme and will undoubtedly lead to more sites coming forward for development, but it does put those sites that are located within the proposed development boundary of Local/Rural/Coastal Villages at a disadvantage as no option of Open Market Housing is afforded under Policy **TAI17**, even though it is considered that Local Need Housing can still be at Open Market Value.

2dd. Is the Deposit Plan sound?

Yes ☐ No ☐ Y

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	Y	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.	<input type="checkbox"/>
I want to speak at a hearing session.	Y

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 Llanaelhaearn (Map Inset 106).

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

Submission of documents and evidence to the examination	Y
Publish Inspector's report	Y
Plan's adoption	Y

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

Supporting Statement with Sustainability Appraisal

Opportunities and Constraints Plan	
Indicative Masterplan	
Signed: 	Dated: 30/03/2015

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

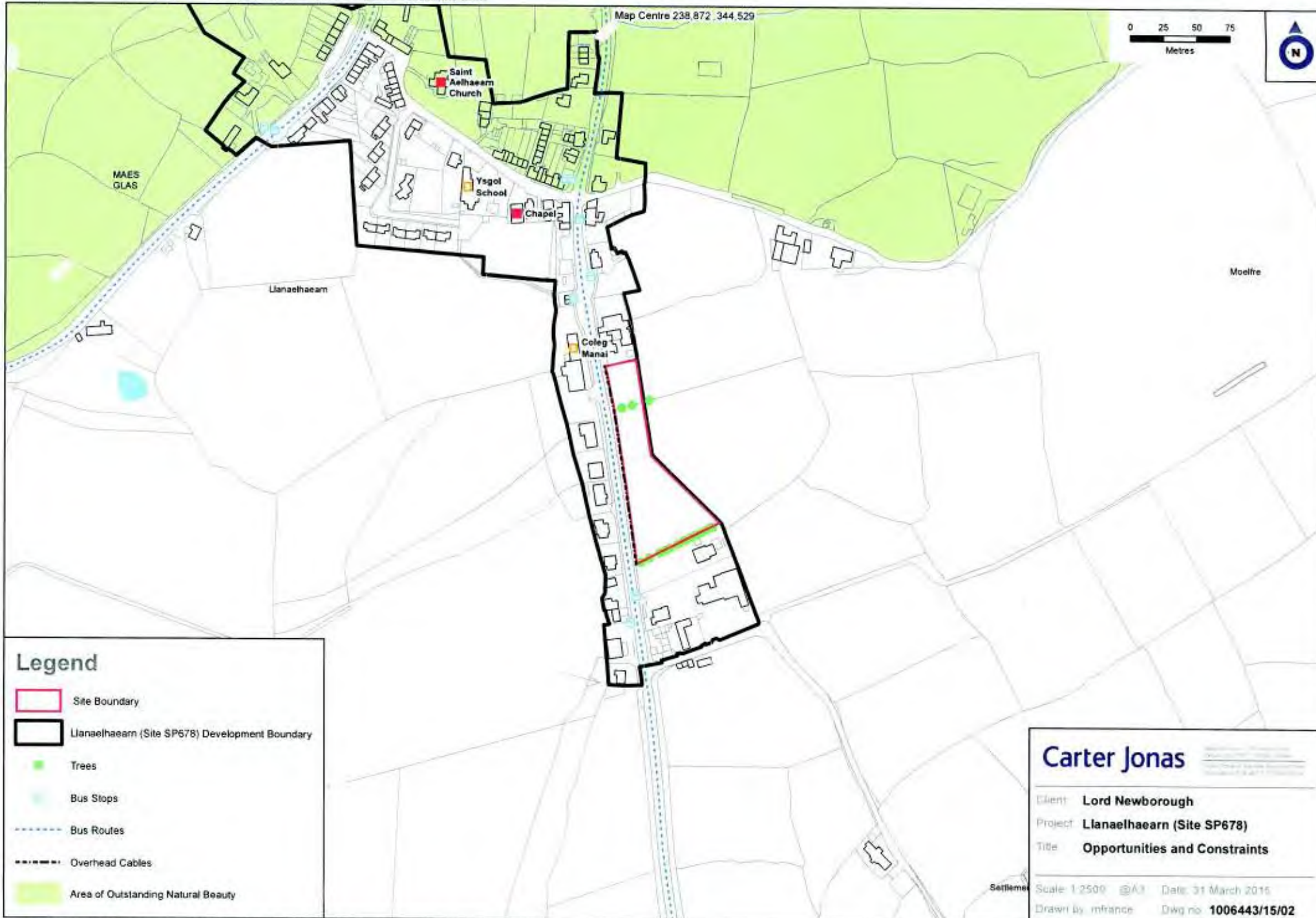
REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

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.



1. Introduction

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

2. Soundness

- 2.1. We consider that the Deposit Plan is sound with regards to the proposed development boundary at Llanaelhaearn (Inset Map 106).

3. Deposit Plan

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

- 3.2. In accordance with 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:*

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

- 3.3. In terms of housing numbers, Paragraph **7.4.124** of the Deposit JLDP states that **Llanaelhaearn** requires an indicative windfall provision of **15** dwellings over the plan period (2011-2026).

3.4. Policy **TAI17** states that: '*Proposals for housing in the following Local, Rural and Coastal Villages will be granted provided they conform to all the following criteria 1) The proposal would satisfy the community need for housing or local need affordable housing...*' Paragraph **7.4.124** states that: '*...housing development will be limited to a scale and type to address community need for housing...No open market housing sites will be allocated in these types of villages...*' The Policy in itself is confusing and there is no definition of what 'community need' means to a planning application. For example, a survey maybe carried out prior to a planning application being submitted which shows that there is a 'community need' for 3 bed homes. The developer may proceed with a planning application to address the need for 3 bed homes, but this does not necessarily imply that the homes will not be sold at Open Market Value as they are not 'Local Need Affordable'.

3.5. Policy **TAI10** does not accord to Policy **TAI17** as it allows for proven Local Need Affordable housing to be built on the edge of a settlement's development boundary. The Policy will even allow for a level of open market housing to supplement the viability of the proposal. This in itself is a good scheme and will undoubtedly lead to more sites coming forward for development, but it does put those sites that are located within the proposed development boundary of Local/Rural/Coastal Villages at a disadvantage as no option of Open Market Housing is afforded under Policy **TAI17**, even though it is considered that Local Need Housing can still be at Open Market Value.

4. Site Assessment

CRITERIA	SITE DETAILS & COMPLIANCE
Site Ref	Land East of A499 (SP678)
Settlement	Llanaelhaearn
Proposal	Residential Development
Current Use	Agricultural

Area	0.5 ha
Density	30 dwellings per hectare
Approx Total Yield	15 dwellings, mixed
HIERARCHY OF SETTLEMENTS	
Located within Settlement Boundary Limit	Site adjoins existing settlement boundary
Previously Developed Land	No
Position in Settlement Hierarchy	Local Village
ACCESS TO KEY SERVICES	
Distance to Post Office	2.4km
Convenience Store	3.6km
Primary School	100m
Secondary School	11.5km
Supermarket	11.5km
Doctors Surgery	500m
Pharmacy	9.7km
Play Area	500m
Dentist	350m
CONSTRAINTS AND DELIVERABILITY	
ENVIRONMENTAL CONSTRAINTS	
Impact of landscape and countryside	No – site developed to South and East – natural extension

Impact on local village character	No – opportunity to enhance area
Impact on views	No – site well screened
Impact on Biodiversity	No – Opportunity to increase biodiversity as currently used for agriculture.
Impact on Historic Environment	No
PHYSICAL CONSTRAINTS	
Flood Risk	No
Ownership	Private ownership
Ground Conditions	Relatively level site capable for development
Archaeology	No
Highways	Access satisfactory (see Indicative Plan)
Availability	Available for development and deliverable within plan period.

5. Development Boundary Justification

5.1. With regards the proposed development boundary drawn for **Llanaelhaearn**, it is considered that the inclusion of The Site SP678 is sound due to the following evidence:

5.1.1. Deliverability – Positive Planning. The Site is under single ownership which allows for effective disposal and deliverability. The inclusion of The Site within the development boundary would also allow for positive planning in accordance with National Planning Policy as The Site is available, deliverable and located on the edge of a settlement suitable for growth.

- 5.1.2. Development Pattern - Paragraph **6.20** of the Deposit Plan states that the development boundary should avoid new ribbon development or a fragmented pattern. It is considered that The Site would allow for infill development to connect land on the East side of the A499 together and would therefore not create a fragmented pattern.
- 5.1.3. Windfall Housing Numbers- Paragraph **7.4.124** of the Deposit JLDP states that **Llanaelhaearn** requires an indicative windfall provision of **15** dwellings over the plan period (2011-2026). Upon examining the Deposit Plan, the Opportunities & Constraints Plan and the Indicative Masterplan, it is concluded that the proposed development boundary for **Llanaelhaearn** is sound.
- 5.1.4. Opportunities and Constraints – As attached at Appendix 1, the plan demonstrates that the development of The Site is feasible and that no major constraints would inhibit the development of it.
- 5.1.5. Indicative Masterplan – As attached at Appendix 2, it is demonstrated that The Site could be developed and delivered with minimal adverse impacts on the surrounding settlement. It is noted that the development of the site would allow for a well designed and sustainable scheme on the edge of the village of **Llanaelhaearn**.
- 5.1.6. Positive Sustainability Appraisal – The proposed changes to the development boundary of **Llanaelhaearn** to include The Site SP678 is in accordance with the Deposit LDP Strategy and also in accordance with the Sustainability Appraisal. (See Section 6)

6. Sustainability Appraisal

Site Name: **Land East of A499 Llanaelhaearn**

Site Area: **0.5Ha**

SA Objective	Assessment	Summary
1. Maintain and enhance biodiversity interests and connectivity (SEA Topics: biodiversity, fauna, flora, soil)	+	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

		<p>enhancement of biodiversity with the planting of trees and hedges where appropriate.</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>2. Promote community viability, cohesion, health and well being (SEA Topics: human health, population)</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>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures (SEA Topics: climatic factors, air)</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>
<p>4. Conserve, promote and enhance the Welsh language (SEA Topic: cultural heritage)</p>	++	<p>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.</p>
<p>5. Conserve, promote and enhance cultural resources and historic heritage assets (SEA Topic: cultural heritage)</p>	++	<p>The Site will contribute towards this SA Objective because The Site will not have an adverse impact on historic or cultural heritage upon development.</p>
<p>6. Support economic growth and facilitate a vibrant, diversified</p>	+	<p>The Site will contribute towards this SA Objective because The Site will offer employment</p>

economy providing local employment opportunities (SEA Topic: Population)		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 (SEA Topic: population, human health)	++	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 (SEA Topics: landscape)	++	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 (SEA Topic: material assets, soil)	++	The Site will contribute towards this SA Objective because The Site would incorporate recycling and sustainable drainage solutions at the Full Planning Application stage.
10. Promote and enhance good transport links to support the community and the economy (SEA Topic: population, human health)	++	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.
11. Safeguard water quality, manage water resources sustainability and minimise flood risk (SEA Topic: water, biodiversity)	++	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		

REP NO: 616

ID 3041

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

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

NO SUMMARY EMAIL NEEDED

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PART 1: Contact details

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

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number <i>(please specify)</i>	PS15 / TAI17
Paragraph number <i>(please specify)</i>	6.20/7.4.124
Proposals/ Inset Map <i>(please specify ref no.)</i>	Inset Map 86
Constraints Map	
Appendices <i>(please specify)</i>	

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

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

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

Objection to the restriction of growth in Tregarth to 13 windfall dwellings over the plan period and the drawing of the development boundary.
Objection to the sustainability assessment for Tregarth (settlement score). The current approach actually puts at risk the viability of local services.

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

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

2dd. Is the Deposit Plan sound?

Yes ☐ No ☒

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

Procedural		Consistency				Coherence & Effectiveness			
P1	P2	C1	C2	C3	C4	CE 1	CE 2	CE 3	CE 4
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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.	<input type="checkbox"/>
I want to speak at a hearing session.	<input checked="" type="checkbox"/>

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

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

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

Submission of documents and evidence to the examination	<input checked="" type="checkbox"/>
Publish Inspector's report	<input checked="" type="checkbox"/>

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

Signed: 	Dated: 31/3/2015
---	------------------

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Test of Soundness

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

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

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

Carter Jonas

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

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

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

1. Introduction

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

2. Soundness

- 2.1. We consider that the Deposit Plan is unsound due to reason CE2 – *The strategies, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.*

3. Deposit Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Conclusion

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

Checklist for Comments on Deposit plan

Person ID: 3070

Representation Number: ① 730 ② 731 ③ 733

Date Received:

1) Inputting Comments

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

Date: 20/4/15 Officer: M

Is there a need for a summary? Y ☒ N

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

Date letter for revised summary sent:

Date response received:

Date any amendment to the summary in light of comments received:

2) Translation

Date sent to the Translation Unit:

Date translation received:

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

3) Acknowledgement

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

Notes:

REP NO :

ID :

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

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


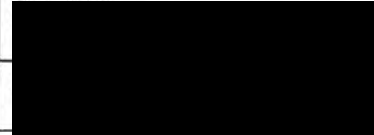
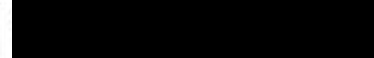
Data Protection

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	RCH Douglas Pennant	Chris Bell
Address	C / O Agent	
Postcode		
Telephone Number		
Email address		

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

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	① PS15 / TAI17 ②
Paragraph number (please specify)	6.20/7.4.124
Proposals/ Inset Map (please specify ref no.)	Inset Map 73 ③
Constraints Map	
Appendices (please specify)	

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

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

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

Objection to the restriction of growth in Llandygai to 8 windfall dwellings over the plan period and the drawing of the development boundary.
Objection to the sustainability assessment for Llandygai (settlement score). The current approach actually puts at risk the viability of local services.

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

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

2dd. Is the Deposit Plan sound?

Yes ☐ No ☒

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

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

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

☐

I want to speak at a hearing session.

☒

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

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

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

Submission of documents and evidence to the examination

☒

Publish Inspector's report

☒

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

Signed XXXXXXXXXX	Dated: 31/3/2015
---	------------------

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

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Test of Soundness

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

DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Conclusion

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



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

Defnydd swyddfa yn unig:

Rhif Cynrychiolydd: 3092/832

Dyddiad derbyn:

Dyddiad cydnabod:

Cynllun Datblygu Lleol ar y Cyd Adnau Ynys Môn a Gwynedd 2011-2026
Ffurflen Sylwadau

Diogelu Data - Y modd y bydd eich sylwadau a'r wybodaeth a roddwch i ni yn cael eu defnyddio. Bydd yr holl wybodaeth a gyflwynir yn cael ei gweld yn llawn gan staff yr Uned Polisi Cynllunio ar y Cyd sy'n ymdrin â'r Cynllun Datblygu Lleol ar y Cyd (CDLI ar y Cyd). Bydd eich enw a'ch sylwadau fel y maent wedi'u nodi yn eich ffurflen sylwadau yn cael eu cyhoeddi, ynghyd ag ymateb y Cyngor. Bydd hyn yn gymorth i ddangos fod yr ymgynghoriad wedi'i wneud yn iawn. Nodwch hefyd y gall y ffurflen hon gael ei rhoi i unrhyw Ymchwiliad Cyhoeddus ar y CDLI ar y Cyd.

Byddai'n well gennym pe baech yn cyflwyno'ch sylwadau'n uniongyrchol ar-lein. Fel arall, gellir llenwi fersiwn electronig o'r ffurflen hon ar-lein yn www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll. Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud. Cewch ffurflenni sylwadau ychwanegol gan yr Uned Polisi Cynllunio ar y Cyd drwy ffonio 01286 685003 neu gellir eu llawr lwytho o wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll neu gallwch lungopïo'r ffurflen hon. Wrth wneud sylwadau, defnyddiwch dudalennau ychwanegol os oes angen, gan nodi rhif y dudalen yn glir.

RHAN 1: Manylion cyswllt

	Eich manylion/ Manylion eich cleient	Manylion yr Asiant (os yw hynny'n berthnasol)
Enw	Tina Gwyrfaï	
Cyfeiriad	[REDACTED]	
Cod Post	[REDACTED]	
Rhif Ffôn	[REDACTED]	
Cyfeiriad e-bost	[REDACTED]	

Nodiadau Canllaw

Rhowch eich sylwadau yn Rhan 2 y ffurflen hon. Defnyddiwch dudalennau ychwanegol os oes angen.
Dylech lenwi ffurflenni ar wahân ar gyfer pob sylw yr hoffech ei wneud.

Mae **Cwestiwn 2dd a 2e** yn gofyn am eich barn ar gadernid y Cynllun Adnau. Rhoddir manylion am y profion cadernid a gwybodaeth ychwanegol ar sut cânt eu defnyddio ar dudalen olaf y ffurflen hon.

Os hoffech i newidiadau gael eu gwneud i'r Cynllun Adnau, gofynnwn i chi fod mor benodol â phosib. Er enghraifft, os hoffech i destun newydd gael ei ychwanegu, nodwch y testun newydd ac esboniwch ymhle yr hoffech ei weld yn y Cynllun Adnau a pham. Hefyd, os hoffech ychwanegu polisi neu baragraff newydd neu eu haddasu, nodwch yn glir beth yw'r testun newydd ac esboniwch ymhle yr ydych chi'n meddwl y dylai fynd yn y Cynllun Adnau a pham.

Os hoffech gael gwared o safle neu gynnig addasiadau i safle sydd wedi'i ddynodi yn y Cynllun Adnau neu os hoffech gynnig safle newydd, gofynnwn i chi atodi cynllun graddfa 1:1250 neu 1:2500 sy'n nodi'n glir ffiniau'r safle. Os ydych yn cynnig safle newydd (un nad yw wedi'i gynnwys yn y Cynllun Adnau) rhaid i chi gynnwys asesiad safle manwl gyda'r ffurflen sylwadau yn unol â methodoleg asesu Safle Arfaethedig y Cyngor a'r fframwaith Arfarnu Cynaliadwyedd. Cewch hyd i'r fethodoleg asesu Safle Arfaethedig a'r fframwaith Arfarnu Cynaliadwyedd ar wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll.

Cewch wybodaeth bellach ar y mater hwn gan yr Uned Polisi Cynllunio ar y Cyd ar **01286 685003** neu ar wefan y Cyngor yn: www.gwynedd.gov.uk/cdll neu www.ynysmon.gov.uk/cdll yn y llyfryn 'Canllawiau Safleoedd Amgen'.

Os yw newidiadau arfaethedig i gynllun datblygu yn cael effeithiau sylweddol ar gynaliadwyedd, bydd gofyn i chi ddarparu'r wybodaeth Arfarnu Cynaliadwyedd berthnasol. Rhaid i'r wybodaeth hon fod yn gyson ag ystod a lefel manylder yr Arfarniad Cynaliadwyedd a gynhelir gan y Cynghorau. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth adnabod effeithiau sylweddol tebygol y polisi diwygiedig neu'r safle newydd.

Dylech gynnwys eich holl sylwadau ar y Cynllun Adnau gan nodi eich achos llawn ar y ffurflen swyddogol, gan ddefnyddio dogfennau ychwanegol os oes angen. Os ydych am weld mwy nag un newid ac yn ystyried nad yw'r Cynllun Adnau yn bodloni mwy nag un prawf cadernid, **dylech lenwi ffurflenni ar wahân ar gyfer pob sylw**. Yn yr un modd, os ydych am wneud sylwadau i gefnogi'r Cynllun Adnau neu elfennau unigol o'r Cynllun Adnau byddai'n ddefnyddiol pe baech yn gwneud y sylwadau hyn ar wahân. Nodwch os ydych yn cyflwyno deunydd arall i gefnogi'ch sylwadau.

Yr unig adeg y bydd gennych gyfle i gyflwyno gwybodaeth bellach i'r Ymchwiliad yw os yw'r Arolygwr yn eich gwahodd i ymateb i faterion y mae ef neu hi wedi'u codi. Nodwch na fydd gan yr Arolygwr sylwadau yr ydych wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol. Os nad ydych yn ystyried bod y Cynllun Adnau yn gadarn ac y dylid ei newid, esboniwch yn glir pam ydych chi'n meddwl bod angen y newidiadau. Os ydych yn meddwl bod angen gwneud newidiadau er mwyn i'r Cynllun Adnau fodloni un neu fwy o'r profion cadernid, dywedwch wrthym pa un / pa rai.

Os yw grŵp yn rhannu barn gyffredin ynghylch sut mae'n dymuno i'r Cynllun Adnau gael ei newid, bydd y Cynghorau'n derbyn deiseb wedi'i llofnodi. Wrth gyflwyno ffurflen sylwadau ar ran grŵp, dylai'r ffurflen sylwadau gynnwys manylion cyswllt unigolyn arweiniol yn Adran 1 a dylid nodi'r sylwadau'n glir ar y ffurflen sylwadau. Dylai'r ddeiseb sydd wedi'i llofnodi nodi'n glir faint o bobl sy'n cael eu cynrychioli a sut mae'r sylwadau wedi'u hawdurdodi. Nid yw llofnodi deiseb yn atal neb rhag cyflwyno ffurflenni unigol.

RHAN 2: Eich Sylwadau a Newidiadau a Awgrymir. (Defnyddiwch un adran Rhan 2 ar gyfer pob sylw yr hoffech ei wneud)

2a. Ar ba ran o'r Cynllun Adnau yr ydych chi'n gwneud sylwadau?

Polisi rhif (nodwch)	7.4. Polisi Tai Manwl	A117.
Paragraff rhif (nodwch)	7.4.123 + Bocs isod.	
Cynigion/ Map Mewnysod (nodwch y rhif cyfeirnod)		
Map Cyfyngiadau		
Atodiadau (nodwch)		

2b. A ydych yn gwrthwynebu neu gefnogi?

Gwrthwynebu	<input type="checkbox"/>	Cefnogi	<input checked="" type="checkbox"/>
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2c. Rhowch fanylion eich sylwadau ar y Cynllun Adnau.

Dyma bolisi gall i amddiffyn cymunedau bychain lleol. Oni ddylai'r amodau i)on) fod yn sail i'r holl gynllun?

Wedi deud hyn, mae angen diffinad cliriach o 'dai ffordd adwy' - yn y cyswllt cymunedol.

Nid yw 2/3 yn gallu fforddio'r hi rhataf un ohermydd cyflogau gwael (is o lawer nag mewn ardaloedd eraill).

Mae angen clustodi mwy o dai ar rent "Tai Teg", yn hytrach na thai ar werth.

Defnyddiwch dudalennau ychwanegol os bydd angen.
Nodwch faint o dudalennau ychwanegol rydych wedi'u defnyddio.....

2ch. Os yw eich sylw yn 2c yn fwy na 100 o eiriau, darparwch grynodeb os gwelwch yn dda (dim mwy na 100 o eiriau).

2d Rhwch fanylion y newidiadau yr hoffech eu gweld i'r Cynllun Adnau

Y polisi TAI 17 yn sail i holl gynllunio
ar wahan i Fangor/Caergybi y caustfannau
Isranbarmol.
Cyfyngu ar adeiladu tai i'r newid
naturiol?

2dd. Ydi'r Cynllun yn gadarn?

Ydi



Nac ydi



2e. Os ydych chi'n meddwl nad yw'r Cynllun Adnau yn gadarn, pa brawf cadernid ydych chi'n meddwl y mae'n ei fethu? (Ticiwch isod os gwelwch yn dda) Rhoddir mwy o fanylion am y profion cadernid ar gefn y ffurflen hon

Gweithdrefnol

Cysondeb

Cydlyniaid ac Effeithiolrwydd

P1



P2



C1



C2



C3



C4



CE



CE



CE



CE



1



2



3



4



Rhan 3: Beth sy'n digwydd nesaf?

Ar y cam hwn o broses y CDLI ar y Cyd, dim ond sylwadau ar bapur y gallwch eu gwneud (a elwir yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall yr Arolygwr alw ar y rheini sydd am newid y Cynllun i ymddangos a siarad â'r Arolygwr mewn 'sesiwn gwrandawriad' yn ystod yr Ymchwiliad Cyhoeddus. Dylech gofio y bydd yr Arolygwr yn rhoi'r un pwys i'ch sylwadau ysgrifenedig ag i'r rheini a wnewch ar lafar yn y sesiwn gwrandawriad.

3a. A ydych am i'ch sylwadau gael eu hystyried fel 'sylwadau ysgrifenedig' neu a hoffech siarad mewn sesiwn gwrandawriad yn yr Ymchwiliad Cyhoeddus? (Ticiwch un o'r isod)

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwy'n fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygwr.

Hoffwn siarad mewn sesiwn gwrandawriad.

**3b. Os hoffech siarad, cadarnhewch pam rydych yn ystyried ei bod hi'n angenrheidiol i chi siarad yn y Gwrandawriad.****3c. A fydddech yn hoffi cael gwybod am y canlynol (Ticiwch y blychau perthnasol)**

Cyflwyno'r dogfennau a'r dystiolaeth i'r archwiliad



Cyhoeddi adroddiad yr Arolygydd



Mabwysiadu'r Cynllun



Os ydych wedi darparu dogfennau ychwanegol i gefnogi'ch sylwadau, rhestrwch hwy isod:

Llofnod:



Dyddiedig:

25/3/2015

DIOLCH AM EICH SYLWADAU AR Y CYNLLUN ADNAU

Cofiwch gynnwys unrhyw ddogfennau perthnasol (e.e. Arfarniad Cynaliadwyedd) gyda'r ffurflen hon.

Dylech ddychwelyd ffurflenni sylwadau wedi'u llenwi i'r Uned Polisi Cynllunio ar y Cyd:

AR-LEIN – drwy lenwi'r ffurflen electronig yn www.gwynedd.gov.uk/cdli neu www.ynysmon.gov.uk/cdli

DRWY E-BOST - polisicynllunio@gwynedd.gov.uk

DRWY'R POST - ei hanfon i: Uned Polisi Cynllunio ar y Cyd, Llawr Cyntaf, Swyddfeydd Cyngor Dinas Bangor, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**DYLECH DDYCHWELYD Y FFURFLENNI SYLWADAU DDIM HWYRACH NA 5.00yh ar 31 Mawrth 2015
NI FYDD SYLWADAU A DDERBYNNIR WEDI'R AMSER A'R DYDDIAD YMA YN CAEL EU HYSTYRIED**

Profion Cadernid

Prawf	Profion Gweithdrefnol
P1	Nid yw wedi'i baratoi yn unol â'r Cytundeb Cyflawni yn cynnwys y Cynllun Cyswllt Cymunedol.
P2	Nid yw'r cynllun a'i bolisiau wedi bod drwy Arfarniad Cynaliadwyedd yn cynnwys Asesiad Amgylcheddol Strategol.
	Profion Cysondeb
C1	Mae'n gynllun defnydd tir nad yw'n rhoi ystyriaeth i gynlluniau, polisiau a strategaethau perthnasol eraill sy'n ymwneud â'r ardal neu ardaloedd cyfagos.
C2	Nid yw'n rhoi ystyriaeth i bolisi cenedlaethol.
C3	Nid yw'n rhoi ystyriaeth i Gynllun Gofodol Cymru.
C4	Nid yw'n rhoi ystyriaeth i'r strategaeth gymunedol berthnasol.
	Profion Cydlynid ac Effeithiolrwydd
CE1	Nid yw'r cynllun yn gosod strategaeth gydlynol ble mae ei bolisiau a'i ddynodiadau yn llifo'n rhesymegol ohono a/neu pan fo materion trawsffiniol yn berthnasol, nid yw'n gydnaws â'r cynlluniau datblygu a ddarparwyd gan awdurdodau cyfagos.
CE2	Nid yw'r strategaethau, y polisiau na'r dynodiadau'n realistig nac yn briodol o ystyried y dewisiadau amgen a/neu nid ydynt wedi'u seilio ar sail tystiolaeth gredadwy.
CE3	Nid oes mecanwaith clir ar gyfer gweithredu a monitro.
CE4	Nid yw'n rhesymol hyblyg i alluogi iddo ymdrin ag amgylchiadau sy'n newid.

Noda Deddf Cynllunio a Phrynu Gorfodol 2004 mai pwrpas ymchwiliad i Gynllun Datblygu Lleol (y Cynllun) yw ystyried a yw'n "gadarn". Golyga hyn y dylai unrhyw un sydd am roi sylwadau ar y Cynllun Adnau neu wrthwynebu iddo geisio dweud pam nad yw'n gadarn a beth sydd ei angen er mwyn ei wneud yn gadarn. Yn y cyd-destun hwn, gellir ystyried cadarn i olygu ei ystyr gwreiddiol o *"dangos barn dda"* a *"y gellir ymddiried ynddo"*. Er mwyn asesu'r Cynllun Adnau, rydym yn defnyddio'r 10 prawf uchod. Bydd y Cynllun Adnau yn cael ei archwilio gan Arolygwr annibynnol a benodir gan Lywodraeth Cymru a thasg yr Arolygwr fydd ystyried a yw'r Cynllun yn gadarn.

Os ydych yn cynnig newid i'r Cynllun Adnau, fe ddylech nodi'n glir pa brawf/brofion cadernid y credwch y mae'r Cynllun Adnau yn ei fethu/eu methu. Mae'r profion mewn tri grŵp – 'Gweithdrefnol' (dau prawf); 'Cysondeb' (pedwar prawf) a 'Cydlynid ac Effeithiolrwydd' (pedwar prawf). Os hoffech wneud sylwadau ar y ffordd y mae'r Cynghorau wedi paratoi'r Cynllun Adnau, mae'n debygol y byddai'ch sylwadau neu'ch gwrthwynebiadau yn disgyn o dan un o'r profion gweithdrefnol. Os hoffech wneud sylwadau neu wrthwynebu i gynnwys y Cynllun Adnau, gallai fod yn gymorth i chi edrych ar y profion 'cysondeb' a 'cydlynid ac effeithiolrwydd'.