



| | | | |
|---|---|--|---|
|  |  | <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p> | <p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 31/3/15 <i>UB</i></p> <p>Date acknowledged:</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 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] | |
| Address | WELSH WATER [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 or www.anglesey.gov.uk/ldp

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

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

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

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

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

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

Enwanke Ukweld (Amodiad 4)

| | |
|--|--------------------------------|
| 2a. Which part of the Deposit Plan are you commenting on? | |
| Policy number (please specify) | TAI 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"/> |

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.....*

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:

[Redacted Signature]

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 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.

Rhosgadfan

- 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.
- Rhosgadfan is served by Llanfaglan Wastewater Treatment Works (WwTW). The proposed growth being promoted for this catchment area would require improvements which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

1306

1307

Rhostryfan

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

1308

Sarn Mellteyrn

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

1309

Talysarn

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

1310

Tregarth

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

1311

1312

Trefor

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

1313

Tudwelliog

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

1314

Waunfawr

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

1315

Y Fron

- Y Fron is served by Llanllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

1316

GWYNEDD COASTAL/RURAL VILLAGES

Aberdaron

- Aberdaron Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1317

Borth y Gest

- Borth y Gest is served by Porthmadog Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1318

Clynnog Fawr

- Clynnog Fawr is served by Pontllyfni Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1319

Corris

- Lower Corris Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1320

Ederm

- Ederm is served by Morfa Nefyn Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1321

Fairbourne

- No additional growth is anticipated in Fairbourne as the indicative housing growth is provided for by completed units and the existing landbank. 1322

Llanaelhaearn

- The proposed growth being promoted for this settlement would require improvements at Llanaelhaearn Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions. 1323

Llangian

- Llangian is served by Abersoch Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1324

Llanbedrog

- No additional growth is anticipated in Llanbedrog as the indicative housing growth is provided for by completed units and the existing landbank. 1325

Llithfaen

- Llithfaen Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area. 1326

Morfa Bychan

- No additional growth is anticipated in Morfa Bychan as the indicative housing growth is provided for by completed units and the existing landbank. 1327

| | | |
|--|---|--|
|  |  | <p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 31/3/15 (eddy)</p> <p>Date acknowledged:</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 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 | Mark Richards | |
| Address | [REDACTED] | |
| 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) | Spoke to Gwynedd LA and they said Part of the Tregarth Inset Plan |
| Paragraph number (please specify) | Spoke to Gwynedd LA and they said leave this empty |
| Proposals/ Inset Map (please specify ref no.) | Spoke to Gwynedd LA and they said this would be acceptable. Pdf – 86 – Tregarth (sent as separate attachment |
| Constraints Map | Spoke to Gwynedd LA and they said leave this empty |
| Appendices (please specify) | None |

| 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.

Re Anglesey and Gwynedd Joint Unitary Development Plan Proposals.

Objections to the inclusion of the section of land that covers **Craig Y Pandy and Waen y Pandy Tregarth** (not other land contained within the plan) within the development plan proposals for the allocation of housing. Removal of this area from the plan.

We, as a community, at **Craig Y Pandy and Waen Y Pandy Tregarth** were informed, via word of mouth, that an area of land (as shown on the Gwynedd and Anglesey joint local development plan consultation portal outlined in black and on the attached map PDF) is being considered for housing development. We wish to point out, at this stage, the following for your consideration:

Having looked at the area of land proposed, there is very little space to fit in any housing within the black boundary area, therefore, should land adjoining the boundary line be more suitable for developers, then under the plan, this can be considered. I make the assumption that this has been the case, as within the Joint Local Development Plan you have included a candidate site register. Looking at sites; SP 668, SP667, SP180 and SP137, they all fall outside the boundary area being proposed but are listed as possible development sites to be considered.

The issue of candidate sites is also leading to confusion, speaking to one of your representatives, I was informed that they were not aware of any one who had put in specific requests for our area. I was informed this may/could happen at a later stage. When I questioned the site register and the specific sites mentioned above, I was informed they were put into the current plan, as they were sites that were in the last plan.

However, the information within the plan regarding candidate sites states

The Candidate Site Register was opened on the 11 October 2011. Developers, landowners, community groups and members of the public were invited to formally submit sites for potential inclusion within the Joint Local Development Plan (JLDP).

So I would be grateful if you could clarify the situation, as I am confused. Have these candidates' sites for the boundary surrounding Waen Y Pandy and Craig y Pandy being included because possible interested parties such as developers have made a submission or have the LA just included them due to the previous plan.

If the later is the case, then I am even more confused in regards site SP-667 as this was previously considered in the last Gwynedd Unitary development plan and was excluded both from the development boundary and from allocation to housing after representation from local residents and on the advice of both Gwynedd Council and the independent inspector. So why include it again ? Surely it should be left out.

One final point in view of the candidate site register. SP137 shows land, which I have been told by the owner no such expression has been made to the Local Authority and should not be shown. Does this mean there are other mistakes and how can we feel confident in information provided by the plan.

The factors we feel contribute to our view that this whole area of development land as shown in the current plan and all highlighted candidate registered sites should be removed.

The effect on the safety of existing residents due to the nature of the proposed site being situated on narrow lanes and including a variety of blind bends. There are no footpaths and therefore, increased risks to children walking to and from school. There is no potential to provide a footpath due to the narrow road. The last inspectors report concluded for one aspect of this area concluded "the erection of additional buildings would result in traffic congestion and hazard" as the existing road network is insufficient to deal with an increase in flow of traffic inevitable with a new housing development.

Note: the volume of traffic has increased substantially since the last report, with further deterioration in the standard of the road, and increasing problems with availability and effects of limited parking. There are more young children attending local schools and concerns over the safety of pedestrians on the road (described by the inspector as a "lane" regards SP-667 in the last report). We have been previously advised by Gwynedd Highways Department that no traffic calming measures can be implemented here due to the narrowness of the road and that it would not be possible to widen the road at this point.

The availability of essential infrastructure

Surface water and foul drainage systems are not adequate to support further development. Also the village has lost further amenities since 2004 leading to the absence of any post office or shop. The availability of parking space within the curtilages of the existing dwellings is severely limited and results in necessary on street parking further reducing visibility and free flow of existing traffic.

The effect on bio-diversity: as per previous surveys and evidence provided in 2004 and referred to in inspectors report development on site SP-667 would harm local bio-diversity.

The effect on the archaeological resource: and the known existence of significant archaeological remains of national importance (included in Archaeological Cambrenesis) on one of the candidate sites.

A **CADW** survey (Ardal Arfon) of 2000 refers to original quarry cottages and adjoining field structure recommending that the conservation priorities are "preservation of character dwellings and open character of settlement".

The effect on the living conditions of adjacent occupiers

The close proximity and narrow aspect of the proposed site for development would mean that any new housing would directly overlook all existing dwellings and invade the privacy of existing occupiers. This was upheld and commented on in previous inspection report.

Housing needs analysis:

There are currently five houses for sale in close proximity to the proposed site, some of which have been on the market for more than 3 years so we would question the need for more dwellings in this area.

There is already a current new development of one property-taking place further down this road at a site with appropriate access and infrastructure.

There are no village services and a diminishing public transport service so people living here would have to be able to drive to access essential services.

In Gwynedd Unitary Development Plan 2001 – 2006, Public Local Inquiry, Proof of Evidence (Gwynedd Council, p14) it states that

Bearing in mind the factors that need to be considered before allocating land for housing and taking into account all the updated information obtained as a result of all the objections and counter – objections about the sites characteristics, surrounding uses and the contribution the site makes to the locality’s open, historic and rural character as well as its value to nature conservation, the council is now of the opinion that the land at Craig Y Pandy and Waen Y Pandy is unsuitable to be include within the development boundary and/or allocated for housing.”

Development at this site would constitute “sporadic residential development in the open countryside” which would “significantly reinforce the existing ribbon of development, eroding the present rural character of the locality” and would in effect “unacceptably increase the intrusion of development into the wider rural landscape”.

Within the current Joint Local Development Plan

Tregarth is classed as a “Local village” meaning “development will be restricted to a scale and type to address the community need for housing on windfall / infill plots within development boundaries. No open market housing sites will be developed within these villages.” (Anglesey and Gwynedd Councils, 2015). Also please note that in previous inspectors report he commented on the distance of the Craig y Pandy settlement from the actual village of Tregarth describing it as “detached from the village and lies in an entirely open rural landscape some distance to the southwest of the consolidated built up area of the village.”

Given the evidence presented we ask that this site is not included in the new UDP. It would seem a shame to have to go to the same lengths as previously which would involve a considerable waste of public time and money not justified in the current economic climate.

Test of Soundness

“The term sound is used to describe a plan that shows good judgement and one that can be trusted based on relevant evidence.” (Gwynedd and Anglesey Development Plan document)

Therefore, based on the evidence that was provided in the last consultation, how can this area being suggested be an option again?

We found out about the consultation via word of mouth at the end of the consultation (29-3-2015) period giving us little opportunity to prepare our case.

It proved impossible to many of us to access the on line application process having to contact the council direct on the 31-3-2015.

Consistency tests:

C1: We feel use of the site and the candidate sites would be contrary to other relevant policies with regard to:

- Road safety / safe routes to school
- Sustainability of infrastructure
- Ribbon development into the open countryside
- Environmental impact
- Historical relevance (presence of early Christian stone cross and proximity to other sites).
- Impact on privacy of existing occupants.

Note: We wish to be kept informed via email. Please refer to contact details at 9 Craig Y Pandy.

Note: This objection was submitted on behalf of the local community following a verbal poll re opinions. In 2004 we had 58 individuals objecting. If this site goes further in the process it is our intention to gather signatures as before and this will lead to potentially over 60 individuals objecting to the inclusion of Craig y Pandy and Waen y Pandy in the LDP and its allocation for housing.

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

A large % of the community at **Craig Y Pandy and Waen Y Pandy Tregarth** wish to object to the inclusion of land that covers our two streets.

We feel it would make our area, less safe for residents, an increase in traffic; infrastructures are not suitable, effects on bio diversity and affect the living conditions of adjacent occupiers.

There are no village services and a diminishing public transport service.

In a previous consultation ***the council is now of the opinion that the land at Craig Y Pandy and Waen Y Pandy is unsuitable to be include within the development boundary and/or allocated for housing.***"

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

The land allocated within the plan to cover Wean y Pandy and Craig Y Pandy is withdrawn form the Plan.

| | | | | | | | | | | | | | | | | | | | |
|---|--------------------------|-----------|--------------------------|--------------------------|-------------------------------------|-----------|--------------------------|-----------|--------------------------|-----------|--------------------------|--------------------------------------|--------------------------|-------------|--------------------------|-------------|--------------------------|-------------|--------------------------|
| 2dd. Is the Deposit Plan sound? | | | | | | | | | | | | | | | | | | | |
| Yes | | | | <input type="checkbox"/> | | | | No | | | | TICK | | | | | | | |
| 2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). <i>More details are provided at the back of this form.</i> | | | | | | | | | | | | | | | | | | | |
| Procedural | | | | Consistency | | | | | | | | Coherence & Effectiveness | | | | | | | |
| P1 | <input type="checkbox"/> | P2 | <input type="checkbox"/> | C1 | <input checked="" 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. | <input type="checkbox"/> |
| I do not. | <input type="checkbox"/> |
| I want to speak at a hearing session. | <input 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.

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

| | | |
|---|--------------------------|-----|
| Submission of documents and evidence to the examination | <input type="checkbox"/> | Yes |
| Publish Inspector's report | <input type="checkbox"/> | Yes |
| Plan's adoption | <input type="checkbox"/> | Yes |

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

| | |
|------------------------------|-------------------------|
| Signed: Mark Richards | 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

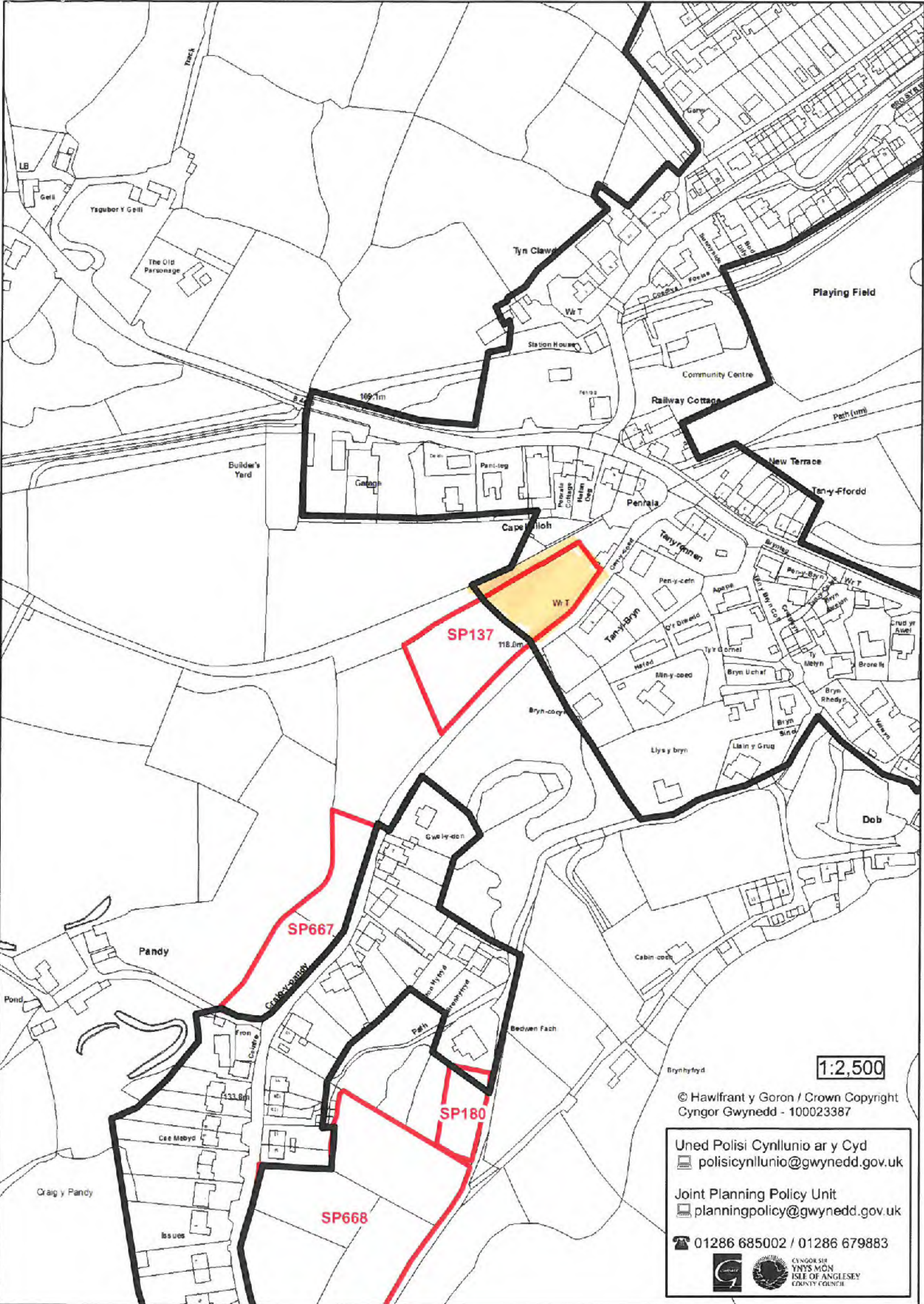
REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

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.



© Hawfrant y Goron / Crown Copyright
 Cyngor Gwynedd - 100023387

1:2,500

Uned Polisi Cynllunio ar y Cyd
 ✉ poliscynllunio@gwynedd.gov.uk

Joint Planning Policy Unit
 ✉ planningpolicy@gwynedd.gov.uk

☎ 01286 685002 / 01286 679883



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 | RCH Douglas Pennant | Chris Bell |
| Address | C / O Agent | South Pavilion Sansaw Business Park Hadnall Shropshire |
| Postcode | | SY4 4AS |
| Telephone Number | | 01939 210125 |
| Email address | | Chris.Bell@carterjonas.co.uk |

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 | <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 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

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: <i>Chris Bell</i> | 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

**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.

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: | South Pavilion, Sansaw Business Park, Hadnall. Shropshire SY4 4AS (01939 210171) |
| Email: | Charlene.Sussums@carterjonas.co.uk Chris.Bell@carterjonas.co.uk |

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 **TAI17** 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.

AS/N/69

165-1010-TREGARTH-ASN69-MAP86

MWJ Properties Ltd

Company Reg No: 08295731, VAT Reg No:157074406

Registered Office: Hughes Parry & Co, [REDACTED]

Mr Mark Jones
[REDACTED]

Ms Nia Haf Davies
Head of Planning Policy
Gwynedd and Mon LDP
Penrhyn Hall
Bangor
Gwynedd

Dear Ms Nia Davies,

25/04/15

Further to my letter of the 20/10/14, in which I did not receive a reply. Having been made aware of the current consultation process. I would therefore be grateful if you could consider the land edged red on the plan attached as a housing designation within the proposed Gwynedd and Mon Local Plan. The reasons are outlined within my previous letter enc.

I would also be grateful if you could pass on my enquiry of the 20/10/14 on to the development management officer who is responsible for the Tregarth area to discuss a possible development under the currently adopted UDP.

Yours faithfully,

[REDACTED]
Mark Jones
(Director)

ENC
CC

Councillor Gwen Griffith, [REDACTED]



686

684

682

680

678

Tregarth

Playing Field

Gerrig-y-baden

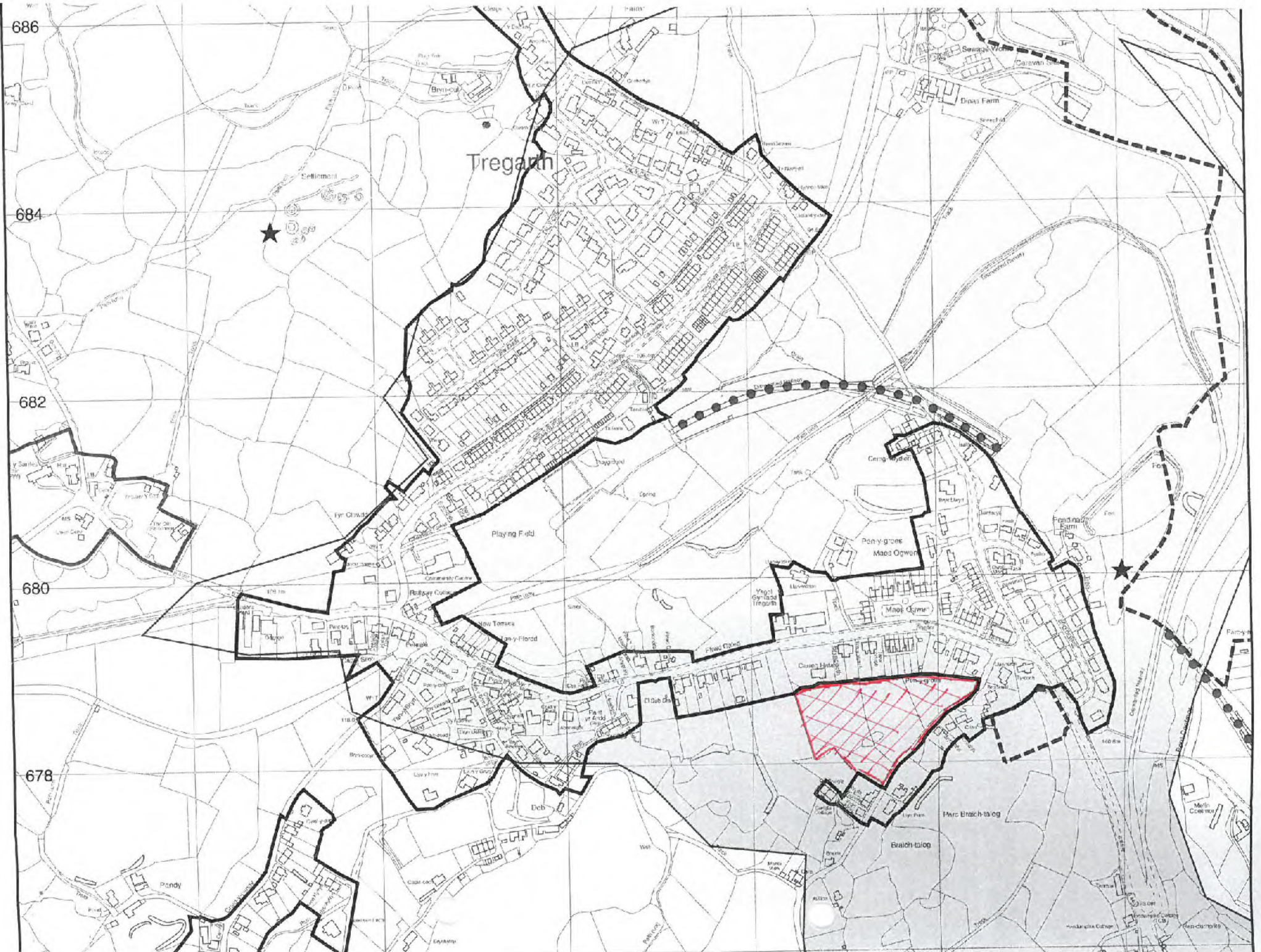
Pony-groes

Maes Ogwr

Maes Ogwr

Parc Brach-y-og

Brach-y-og



COPY

MWJ Properties Ltd

Company Reg No: 08295731, VAT Reg No:157074406
Registered Office: Hughes Parry & Co, [REDACTED]

Mr Mark Jones
[REDACTED]

Ms Nia Haf Davies
Head of Planning Policy
Gwynedd and Mon LDP
Penrhyn Hall
Bangor
Gwynedd

Dear Ms Nia Davies,

20/10/14

It is regrettable that we have only recently become aware of the exercise to identify lands suitable for housing development associated with the Gwynedd and Môn LDP.

Notwithstanding, we have recently acquired land that may be of interest to you in the preparation of the proposed Local Plan. Namely the land bounded in red on the attached plan.

We consider that this land may be eligible for inclusion within the Local Development Plan for the following reasons:-

The land closely follows the Gwynedd UDP housing development boundary for Tregarth and is surrounded to the North, South, East and South West by this boundary.

As part of your Bangor Ogwen housing targets this land could be used to alleviate some of the pressure in finding suitable lands within the larger towns of Bethesda and Bangor, while also allowing a sustainable allocation for the current and future needs of Tregarth.

It is considered that the junction onto the B4409 has sufficient capacity for a small sustainable housing development. It is acknowledged however that the road leading from Mynydd Llandygai bottle necks along the housing that fronts Parc Braich Talog and does hinder the amenity of existing houses along the road. Therefore, as we own sufficient lands along the highway at this location, we could be in a position to provide planning, highway and amenity gains.

Further to the above, we are aware of current policies within the Gwynedd UDP and supported by national planning policies that allows affordable housing on land which have not been allocated within the development boundaries of villages, but is immediate to the boundary as is the case here. Therefore if you do not consider the land merits designation in the future LDP, do you consider it has the potential for housing development within the current UDP?

I would therefore be grateful if you could consider this land as a housing designation within the proposed Gwynedd and Mon Local Plan. I would also be grateful if you could pass on my enquiry to the development management officer who is responsible for the Tregarth area to discuss a possible development under the currently adopted UDP.

Yours faithfully,

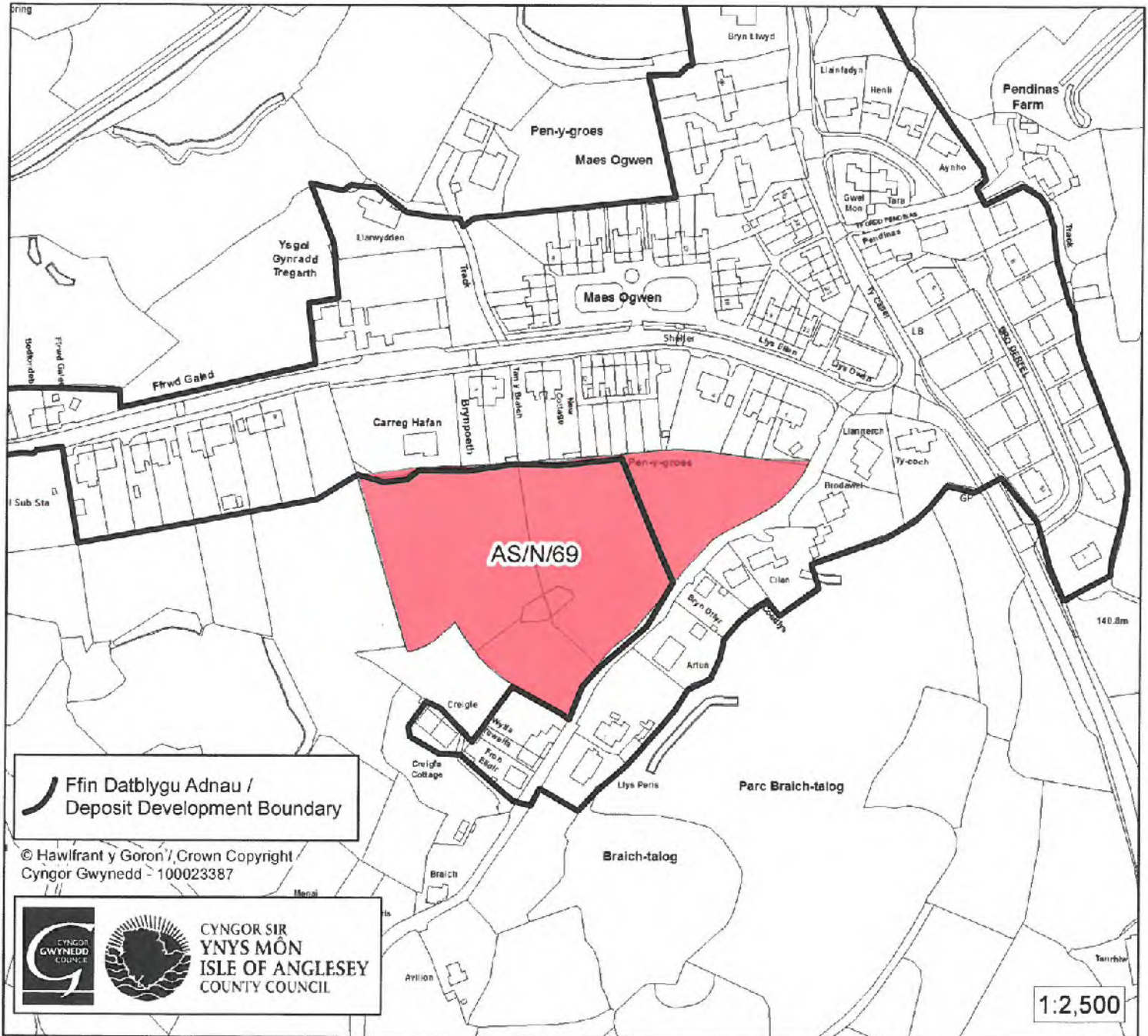
Mark Jones
(Director)

ENC
CC

Councillor Gwen Griffith, [REDACTED]

**Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn
Anglesey and Gwynedd Joint Local Development Plan
2011- 2026**

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



Math o Safle Amgen / Alternative Site Type: SAFLE NEWYDD / NEW SITE

Cyfeirnod / Reference: AS/N/69

Enw'r Safle / Site Name: Tir ger / Land adj Braich Talog

Lleoliad / Location: Tregarth

Cyngor Cymuned / Community Council: Llandygai

Maint (ha) / Size (ha): 1.3

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