

	 <p style="margin: 0;">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: 31/3/17 </p> <p>Date acknowledged: _____</p>
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Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026 Representation Form

Data Protection

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

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp 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 Roberts
Address		Barton Willmore
Postcode		[REDACTED]
Telephone Number		
Email address		

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)

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

Policy number (please specify)	Policy AMG5: protecting sites of regional or local
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

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

Policy AMG5: protecting sites of regional or local significance

This policy seeks to protect areas identified in the Plan for their ecological interest.

However, we note that land at the former Dynamex Friction Site, is identified as being within a Wildlife Site (WS) Plas Brereton.

However, the area included within the Wildlife Site is subject to significant levels of contamination including derelict buildings, a former sewerage works, various large structures, and hard surface areas, associated with the former use of the site.

In order to remediate and deal with the legacy of the contaminated land and buildings, it will be necessary to remediate and demolish buildings within the Wildlife Site. The policy as drafted does not allow for standard mitigation techniques to be employed to deal with any wildlife or habitats on the site which would be subject to demolition or remediation works. Mitigation can be provided through translocation of any protected species to other parts of the site not subject to demolition works, or through the timing of demolition, remediation and construction activities to avoid impacts on the Wildlife Site or protected species.

The Policy therefore does not comply with Test of Soundness C2 as it does not comply with Planning Policy Wales & CE2 as it is not realistic having regard to other alternatives.

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

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

Reference should be made to the presumption in favour of sustainable development.

Proposed Change

The policy should be re-written to allow on-site mitigation or other techniques to be utilised as is common practice on previously developed sites and non-statutory protected wildlife sites.

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	x	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	x	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

Part 3: What Happens Next?

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

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

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

I want to speak at a hearing session.

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

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

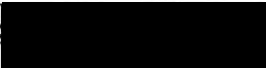
Submission of documents and evidence to the examination

Publish Inspector's report

Plan's adoption

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

Signed:



Dated: 31/03/15

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.

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **338**

Enw / Name: **North Wales Wildlife Trust (Mr Chris Wynne) [2626]**

Rhan: **POLISI AMG5**

Section: **POLICY AMG5**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Rydym yn croesawu'r gefnogaeth a roddir i safleoedd o bwysigrwydd rhanbarthol neu leol. Fodd bynnag, rydym yn awgrymu bod yr ail baragraff yn dechrau gydag 'os' yn hytrach na 'pan';

Representation Summary:

We welcome the support given to sites of regional or local importance.

However we suggest that the second paragraph starts with "if" rather than "when".

Sylw Llawn / Full Representation:

We welcome the support given to sites of regional or local importance.

However we suggest that the second paragraph starts with "if" rather than "when".

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **240**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI AMG5**

Section: **POLICY AMG5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylai'r polisi edrych yn fwy cadarnhaol ar ddatblygiadau cloddio mwynau a chefnogi safleoedd presennol ac estyniadau i safleoedd presennol dros ddatblygiadau newydd. Awgrymu ymuno â pholisi AMG4 er mwyn caniatáu Asesiad Ecolegol i gefnogi datblygiad y safleoedd.

Representation Summary:

The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.

Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.

Sylw Llawn / Full Representation:

The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **241**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI AMG5**

Section: **POLICY AMG5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylai'r polisi edrych yn fwy cadarnhaol ar ddatblygiadau cloddio mwynau a chefnogi safleoedd presennol ac estyniadau i safleoedd presennol dros ddatblygiadau newydd.

Representation Summary:

The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.

Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.

Sylw Llawn / Full Representation:

The policy should look more positively toward mineral extraction development and support existing sites and extensions to existing sites over new development.

Newid(iadau) i'r Cynllun

Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sit

Change(s) to the Plan

Suggest potential merge with Policy AMG4 to allow for Ecological Assessment to support development of sites.

Profion Cadernid / Soundness Tests: x, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **164**

Enw / Name: **Rod Dixon [2774]**

Rhan: **POLISI AMG5**

Section: **POLICY AMG5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae Ynys Môn yn debygol o gael statws geoparc byd-eang UNESCO. Dylai hwn gael ei gynnwys fel ardal dan warchodaeth. Cynnwys safleoedd UNESCO a geoparc byd-eang fel ardaloedd dan warchodaeth.

Representation Summary:

Anglesey is likely to achieve UNESCO global geopark status. This should be included as a protected area.

Include UNESCO sites and Global Geoparks as protected areas

Sylw Llawn / Full Representation:

Anglesey is likely to achieve UNESCO global geopark status. This should be included as a protected area

Newid(iadau) i'r Cynllun

Include UNESCO sites and Global Geoparks as protected areas

Change(s) to the Plan

Include UNESCO sites and Global Geoparks as protected areas

Profion Cadernid / Soundness Tests: ii

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **192**

Enw / Name: **Mrs Irene Stott [2780]**

Rhan: **POLISI AMG5**

Section: **POLICY AMG5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae Ynys Môn yn debygol o gael statws geoparc byd-eang UNESCO. Dylai hwn gael ei gynnwys fel ardal dan warchodaeth. Cynnwys safleoedd UNESCO a geoparc byd-eang fel ardaloedd dan warchodaeth.

Representation Summary:

Anglesey is likely to achieve UNESCO global geopark status. This should be included as a protected area. Include UNESCO sites and Global Geoparks as protected areas.

Sylw Llawn / Full Representation:

Anglesey is likely to achieve UNESCO global geopark status. This should be included as a protected area

Newid(iadau) i'r Cynllun

Include UNESCO sites and Global Geoparks as protected areas

Change(s) to the Plan

Include UNESCO sites and Global Geoparks as protected areas

Profion Cadernid / Soundness Tests: ii

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)	AMG 2, AMG 3, AMG 4 and AMG 5
Paragraph number (please specify)	
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.
<p>Policies AMG2, AMG3 and AMG4 related to features and qualities that are unique to the local landscape, coastal protection local biodiversity conservations.</p> <p>We support these policies which are in line with the objectives of the Friends of Borth-y-Gest.”</p> <p>We would wish AMG5, which makes specific reference to local nature reserves, made reference to a table in which such reserves were listed.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

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

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

None in respect of policies AMG2, AMG3 and AMG4: But we would wish to oppose any proposals by others that threaten these themes

We would wish AMG5, which makes specific reference to local nature reserves, to make reference to a table in which such reserves are listed.

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 checked="" type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>