

AS/A/10

		<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received:</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	Mr Rob Bonser	Ms Jan Tyrer Jan Tyrer Planning Consultant
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Email address		
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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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	Inset 19 Barmouth/Abermaw
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.

The development boundary for Barmouth, which currently excludes this site, should be amended to include it thereby helping to ensure that the appropriate indicative growth level for Barmouth can be achieved.

Barmouth as a local service centre along with 19 other settlements falls within the third tier of the settlement hierarchy as defined in the deposit LDP where under Strategic Policy PS15 at least 20% of the Plan's housing development is to be accommodated. It is one of the more isolated local service centres, the next closest being Dolgellau in the Snowdonia National Park approximately 30km to the East and Penrhyndeudraeth at least 24km away to the north (34km if the toll bridge is closed) The closest second tier urban centres are Blaenau Ffestiniog 35km, or Porthmadog 29km away (39km if the toll bridge is closed) which are both to the north whilst the sub regional centre Bangor is at least 90km away to the north. In this context Barmouth's future strength and success in fulfilling its role as a local service centre is particularly important and arguably more crucial than in other local service centres that lie in far closer proximity to the urban centres or sub regional centre, and yet its indicative housing growth of 91 dwellings has been set lower than several of the other local centres. Whilst it is acknowledged that the higher levels of indicative housing growth in Penrhyndeudraeth (191) and Criccieth (144) can in part be justified as compensatory measure for the constraints experienced in the nearby urban centre of Porthmadog, the figure is also higher in Tywyn (103) which is similarly located at significant distances from other local centres and higher ranking settlements.

The urban capacity study undertaken for Barmouth detailed in Topic Paper 6 has identified Barmouth as having a total capacity for 115 dwelling units of which a much high percentage are derived from the division of existing houses (29 units or 25%) and the conversion of commercial buildings, (55 units or 48%) than in other settlements. Whilst it is acknowledged that these figures have been derived from past planning consents, both the availability of large houses suitable for conversion into smaller units, and commercial properties suitable for conversion, is a finite resource. Consequently I challenge the presumption that this rate and level of housing provision can continue to be secured from this source into the future. In addition the appropriateness of such a depletion of these properties is questionable, particularly the loss of commercial properties which are crucial to the longer term health of the local economy. It has been confirmed to me by officers in the Anglesey and Gwynedd Joint Planning Policy Unit, that of the 44 housing units which were approved between the years 2000 and 2012 as a result of the conversion of commercial properties, at least 32 of these involved the conversions of hotels or guesthouses. Strategic Policy PS11 in the deposit LDP as

confirmed by paragraph 7.3.55 aims to protect existing hotels and other serviced accommodation, consequently it is therefore reasonable to assume that the approval of such conversions in the future will not be so forthcoming. The contribution made by these elements of the settlement's urban capacity figure has I would argue been significantly over estimated in this instance, and for 73% of the indicated urban capacity figure to rely on these sources of future housing is I believe untenable and inappropriate.

Another source of housing detailed in the urban capacity studies is empty housing and for Barmouth a figure of 18 units has been noted which accounts for 16% of the total urban capacity figure. Whilst bringing empty housing back into use has been an accepted source of housing supply in other LDPs, the contribution it can make must be realistically calculated and evidenced based. For example in the Conwy LDP, the figure of 25 dwelling units per year for the whole plan area was used and accepted by the Inspector assessing the plan as this corresponded with the aims of the authority's empty homes programme and was supported by the number of empty homes that had been brought back into occupation through that programme over the previous few years. However this figure was only applied on a plan wide basis as a contribution to the identified housing need and no attempt was made to break the figure down and apply it to individual settlements as this LDP has done. In this Plan a base figure of 50 empty homes being brought back into use per year for the whole of the Gwynedd Council area has been used and I understand from discussions with the Council's empty homes officers that this is reflective of the figures they have achieved since April 2011, see table below. Topic Paper 6 notes that in November 2012 the whole of the Gwynedd Council area recorded 1030 empty homes. Using the target of 50 units per year for the whole plan period this appears to address an optimistic 73% of this number, but in fact such a calculation does not take account of two important factors. The first is that many of the short term empty homes, ie those that have been empty for more than six months but less than 2 years, return to occupation without assistance through the private housing market, particularly in settlements such as Barmouth where demand for housing is higher. The second is that particularly during the latter stages of the Plan period the empty homes strategy will be tackling new empty homes that were in occupation at the start date of the Plan. In these circumstances I would argue that these dwelling units cannot be classed as new residential units and should not therefore be contributing towards the urban capacity figures detailed in Table 28 of Topic Paper 6. Consequently once the backlog of longer term empty homes in existence at the commencement of the Plan period has been tackled it is likely that the empty homes strategy will be effectively maintaining a status quo by helping to prevent properties drop out of the housing supply for long periods of time. The Council's Empty Homes Strategy is influenced by a wide range of others factors rather than just the number and location of empty homes, therefore, to utilise the blanket calculation detailed in Topic Paper 6 to try and break down the contribution that existing empty homes can make to the housing supply in individual settlements is flawed and does not provide a credible evidence base at this level. Indeed I would argue that this distorts the true picture and the overall contribution that the empty homes strategy can make to housing supply should be incorporated into the Plan wide housing growth calculations, rather than at this more localised level. This distortion is confirmed by the following figures provided by Gwynedd's Empty Homes Unit showing the total number of residential units brought back into use within the whole of Gwynedd and how many of these were located within Bangor and Blaenau Ffestiniog:

Year	Total No of units in Gwynedd	No of units in Bangor	No of units in Blaenau Ffestiniog
2011/12	48	23	1
2012/13	48	2	6
2013/14	54	2	1
2014/15	66	3	8

This not only highlights the significant fluctuations that can occur within individual settlements each year but the wide disparity between the numbers detailed in Table 28 of Topic Paper 6 and the number of empty homes brought back into use that is being achieved. In particular in the case of Bangor, although the calculated contribution is 34 for the whole plan period 30 residential units have already been brought back into use during the first four years of the Plan and demand for such housing remains high here. This is almost double the figure achieved in Blaenau Ffestiniog, where although the number of empty properties is high the demand for housing is much lower. Yet the figures in Table 28 predict 49 homes in being brought back into use in Blaenau Ffestiniog against just 34 for Bangor. As mentioned above demand for housing in Barmouth is high due to its seaside location and tourist industry and therefore there has been very little need for the empty homes unit to become involved in properties here because properties tend to only remain empty in the short term.

The fieldwork survey input into the urban capacity study only identified 9 sites within Barmouth capable of accommodating a total of 12 units. These included one site for one unit under category A (vacant/dormant land and buildings that have been previously developed for non residential purpose), two sites each for 2 units under category B (redevelopment of car parks), three sites each for one unit under category C, (Intensification of land use in residential areas), and finally three sites capable of accommodating a total of 4 units under category E, (derelict land that has not been previously developed within the development boundaries).

Given the low level of development opportunities within the existing settlement boundary for Barmouth for housing identified through the fieldwork study, the inappropriately high levels of new units predicted to come forward as a result of the conversions of commercial properties and conversions of large dwellings, and the issues raised over the calculations associated with the calculations for bringing back into use existing empty homes then there is a strong argument for additional land to be included within the development boundary to help ensure that the indicative windfall target of 81 dwellings given in policy TAI15 is met.

The land proposed for inclusion within the development boundary for Barmouth is a brownfield site which although currently unused previously contained hard surface tennis courts and gardens as part of the grounds of the Tower House School, ie a Category A site in the methodology used for the field work study. After the school's closure, planning permission was granted in 2004 for the subdivision of the school's buildings and grounds into 10 single dwelling plots. Some of these involved the conversion and/or sub-division of existing buildings, whilst others like this site, were the subject of outline planning permission for new dwellings. Of the original 10 approved dwellings 8 have been completed or commenced, whilst the planning permission for two plots on this site has expired.

The site was proposed as a candidate site for housing and given reference number SP346, but has remained unallocated and like the rest of the grounds of the former school, lies outside the development boundary for Barmouth in the deposit LDP. On Page 31 of Topic Paper 1A Assessing the Candidate sites under Planning Policy Comments for this site it is noted "*Historical planning permissions has previously been granted on this site. Site is unlikely to be suitable for allocation as individual plots are in the process of being constructed.*" This is factually incorrect, as all historic planning consents relating to this particular site have expired. The original outline planning permission granted under reference number C04M/0068/AM on the 19th August 2004 covered the two plots on this site as well as a plot on adjoining land to the west where Encil Mynach has now been constructed. On this site, although an application for the approval of reserved matters was submitted within the relevant time period for the northern plot on the old tennis courts, it was withdrawn before determination and when no subsequent application was submitted the outline planning permission expired on this plot. With regard to the southern plot, which encompasses some

of the garden area within the former school's grounds, this was the subject of an approval of reserved matters under reference number C07M/0134/00/MG granted on the 10th October 2007, but this expired two years later.

This site is not affected by flood risk unlike other parts of the settlement, can be appropriately accessed as confirmed by the sites planning history and can accommodate development without adversely impacting on the TPO that covers the southern part of the site and has the potential to improve biodiversity particularly in the area that contained the old hard surfaced tennis courts. It is also well placed within the settlement being located within 800m of the wide range of facilities that Barmouth offers including its train station, is within 400m of a primary school, doctor's surgery, dentist, sport's facilities and play area and is within 200m of a bus stop on a well serviced bus route.

The eastern and northern boundary of this site follows the line of the A496 and abuts the development boundary for Barmouth in the Deposit LDP, the site is therefore sandwiched between the recognised urban form of Barmouth and the existing development that has taken place within the grounds of the former school. This is a vacant brownfield site in a sheltered and well screened location, surrounded by existing and approved residential development with a planning history of permission for residential development, which, if included within the settlement boundary could make a useful and needed contribution to the indicated indicative windfall provision of housing in Barmouth.

*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

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

There are serious errors in the judgements made and methods used to calculate the urban capacity for Barmouth detailed in Topic Paper 6 resulting in a significant and inappropriate reliance on the conversion of existing large houses and commercial properties and the contribution of the empty homes strategy. The inclusion of this brownfield site, which has been the subject of previous planning consents for residential development, within the development boundary for Barmouth, would help support and achieve the required indicative windfall provision of 81 dwelling units identified in Policy TA15.

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

The redrafting of the development boundary for Barmouth indicated on Inset Map 19 to include this site.

2dd. Is the Deposit Plan sound?

Yes No

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

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

Part 3: What Happens Next?

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

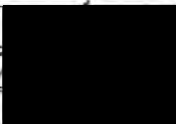
3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

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

I want to speak at a hearing session.

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

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:	
Candidate site register plan for site at scale 1:2500	
Sustainability Appraisal for site	
Signed:	Dated: 11/03/15



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:

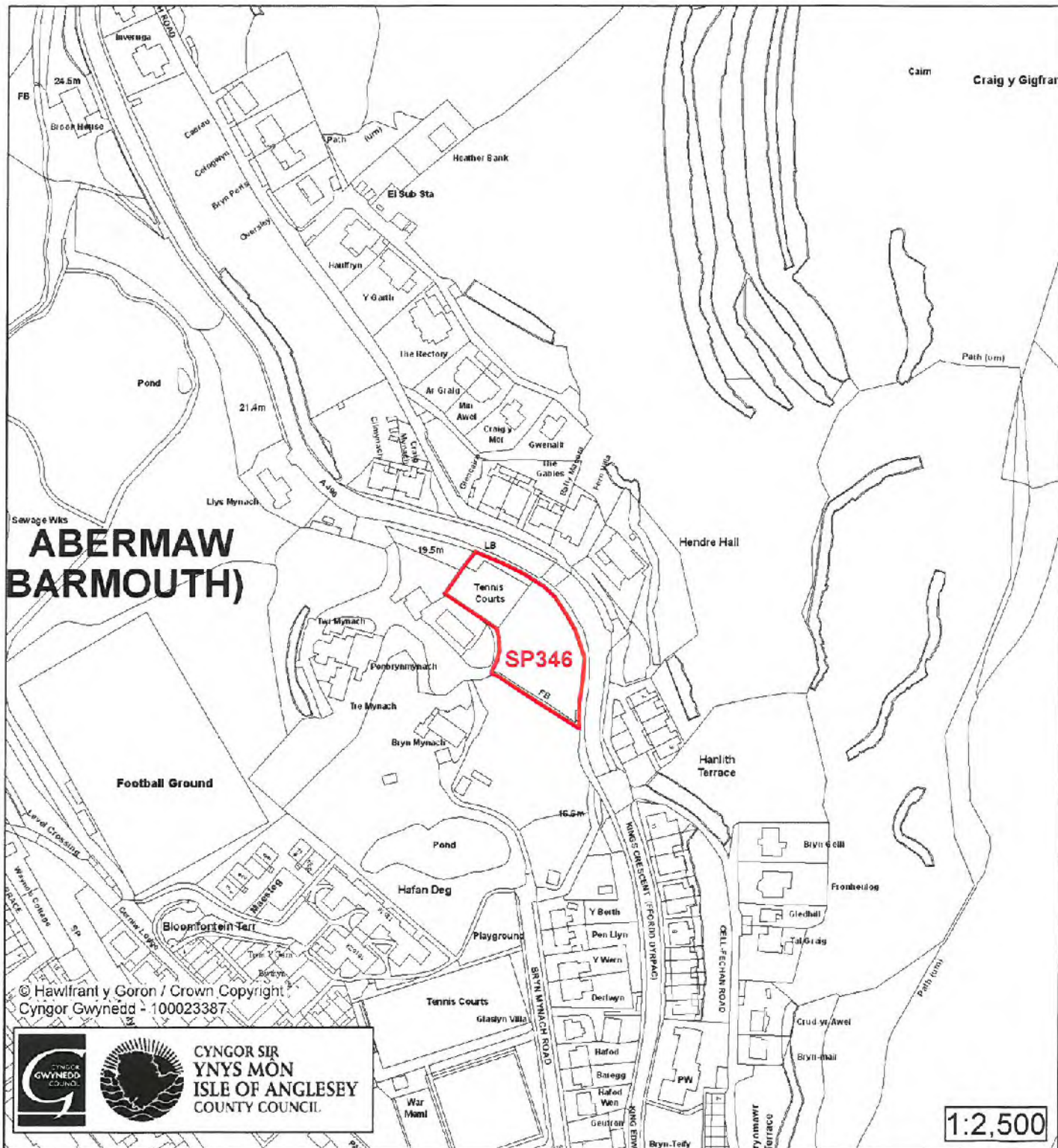
ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

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

Cynllun Datblygu Lleol ar y Cyd Joint Local Development Plan Cofrestr Safle Posib / Candidate Site Register



Cyfeirnod / Reference	: SP346
Enw'r Safle / Site Name	: Tir ger / Land adj Encil Mynach
Lleoliad / Location	: Abermaw
Cyfeirnod Grid / Grid Reference	: 611 164
Maint (ha) / Size (ha)	: 0.25
Defnydd â Awgrymir / Suggested Use	: Tai / Housing

SUSTAINABILITY APPRAISAL BASED ON DECISION AIDING QUESTIONS NOTED IN TABLE 2.6: OF THE ANGELSEY AND GWYNEDD JLDP SUSTAINABILITY APPRAISAL REPORT:

SITE: Land adjacent to Encil Mynach, Barmouth

SITE AREA: 0.25 hectare

PREVIOUS REFERENCE: Candidate Site Ref SP346

Objective 1 Maintain and Enhance biodiversity interests and connectivity:

Score: + This is a brownfield site which although now vacant previously contained a hard surface tennis courts and gardens as part of the grounds of the former Tower House School. There are no internationally, nationally or local biodiversity designations within or adjacent to the site although the trees in its southern section as well as those on adjoining land to the south and west are the subject of TPO (3/TP/M8) placed on the land on the 3rd April 2001. The site can accommodate development without adverse impact on the TPO trees and would result in improved biodiversity particularly in the area where the former tennis courts were located.

Objective 2 Promote community viability, cohesion, health and well being:

Score: +/- Screened from public view this site has no value as an open space or recreational importance and its previous use has resulted in no risk of land contamination. It is within 400m of some local facilities including primary school, doctor's surgery, dentist, sports facilities and play area and within 800m of the town centre with a wide range of facilities including banks, library, post office, supermarket, pharmacy and railway station. The site is not affected by any conflicting land uses. It is currently located outside but abutting the development boundary for the settlement in the UDP however if the planning history of the former Tower School and its grounds is taken into account it should be viewed as being located within the overall built form of the settlement as it is surrounded on all sides by existing development. This position is confirmed by the fact that after its closure planning permission was granted in 2004 for the subdivision of the former Tower school and its grounds into 10 single dwelling plots. Some of these involved the conversion and or subdivision of existing buildings within the school's grounds, whilst others like this site, were the subject of outline planning permission for new dwellings. 8 of the original 10 approved dwellings, all of which lie to the west and south of this site have been completed or have been commenced and it is only on this site, which accommodated two of those original plots, that the earlier planning consents have expired, leaving a vacant hole within the existing urban form of this part of the settlement. Consequently it is clear from this planning history, that despite the site's location outside the current development boundary for the settlement in the UDP it has previously been considered and still is part of the built form of the settlement.

Objective 3 Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures:

Score: 0 This site is not at risk of flooding, and as detailed above it is located within the built form of the settlement. It is close to and accessible from the A496 via a private access road, and the junction of the access road with the public highway and the nearby highway system is capable of accommodating the additional traffic any further development of this site would generate. A gabion wall and access ramp down to the site was constructed under planning consent reference number C04M/0078/AM and no highway objections have been raised in connection with previous planning approvals on this site. The site has a separate pedestrian access onto the A496 at its southern end and is within walking distance of all services and facilities

Objective 4 Conserve, promote and enhance the Welsh language:

Score: 0 As detailed above the site is within 800m of the wide range of facilities available within the settlement and is within 400m of a primary school, doctor's surgery, dentist, sports facilities and play area and is within 200m of a bus stop on a well serviced public transport route.

Objective 5 Conserve, promote and enhance cultural resources and historic heritage assets:

Score: 0 This site is not affected by any geological, historical or cultural designations and is in a well screened location so that it would not adversely impact upon any important views or vistas or on the character of the settlement.

Objective 6 Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities:

Score: 0 As detailed above the nearby highway system and junctions are able to cope with the potential development of this site and the site is well placed in terms of access to public transport and local facilities. Connections to all utility services are on site including gas, water sewerage and telecommunications. There are no conflicting land uses

Objective 7 Provide good quality housing, including affordable housing that meets local needs:

Score: + See response to objective 6 above for comments on highway system and connection to all utility services and objective 2 above for access to local facilities. Development of this site will help deliver adaptable housing that addresses the individual needs of the community

Objective 8 Value, conserve and enhance the plan area's rural landscapes and urban townscapes:

Score: + See response to Objective 5 above Also as this site forms part of the curtilage of the former Tower school this is a brown field site.

Objective 9 Use land and mineral assets effectively and promote mechanisms for waste minimisation, re-use and recycling:

Score: + As the site forms part of the curtilage of the former Tower school it is a brownfield site and there would be no loss of the best and most versatile agricultural land. There is no known risk of contamination from previous uses and as the site is within a predominantly residential area there are no potential conflicting land uses.

Objective 10 Promote and enhance good transport links to support the community and the economy

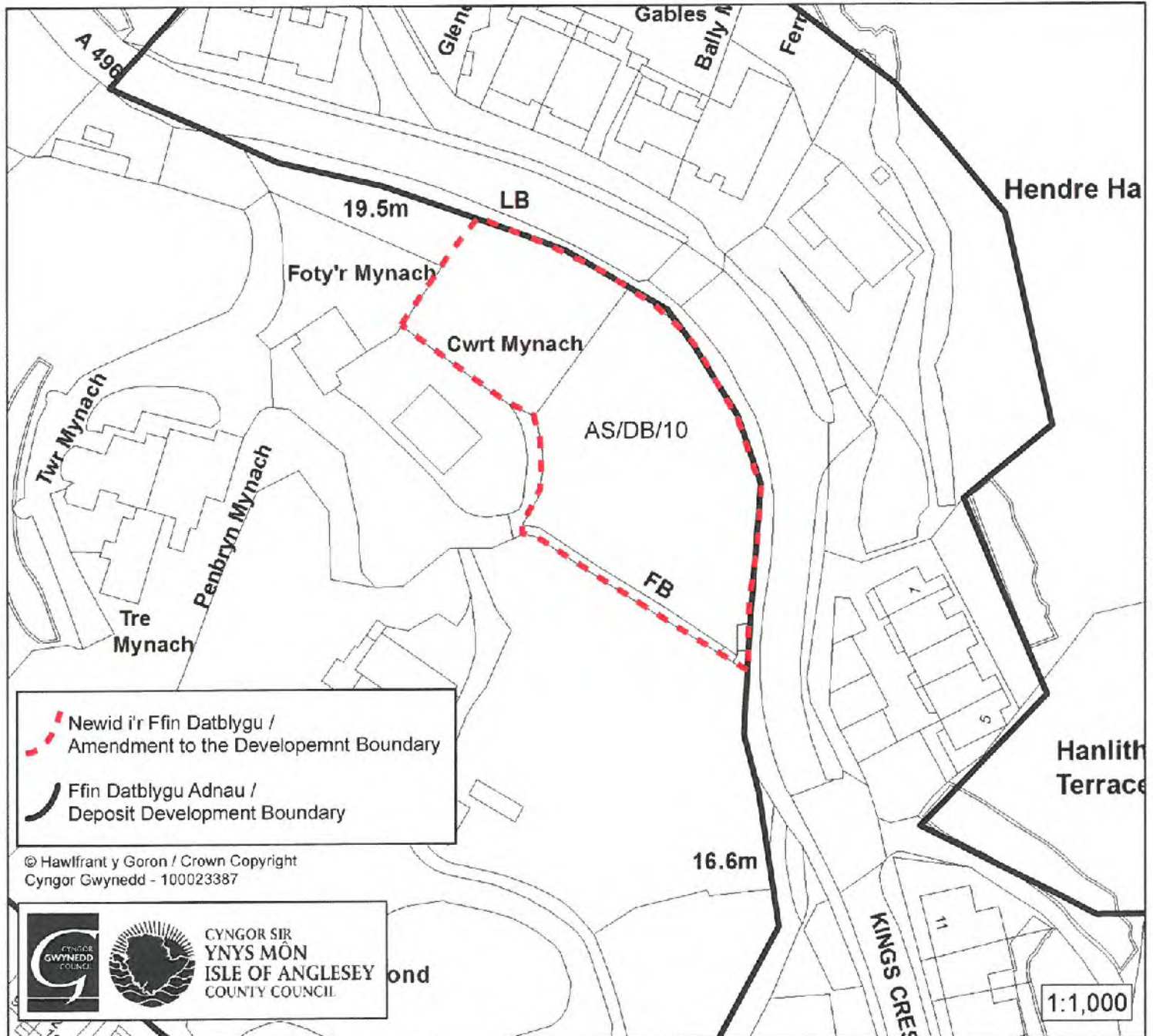
Score: + Site is within 200m of a bus stop and the route is not obstructed. The existing vehicular access up to the public highway is ramped but not unduly steep and there is also a much flatter pedestrian only access at the southern end of the site out on to the public highway. As detailed in objective 3 above site accessibility and the standards of capacity of relevant road junctions have previously been confirmed as acceptable for this site. The site is also within 300m of the Wales Coastal Path and National Cycle route no 8

Objective 11 Safeguard water quality, manage water resources sustainability and minimize flood risk:

Score: 0 The site is not within an area at risk of flooding or within a groundwater or surface water protection area.

**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: **NEWID I'R FFIN DATBLYGU / AMENDMENT TO DEVELOPMENT BOUNDARY**

Cyfeirnod / Reference: AS/DB/10

Enw'r Safle / Site Name: Tir ger / Land adj Encil Mynach

Lleoliad / Location: Abermaw

Cyngor Cymuned / Community Council: Abermaw

Maint (ha) / Size (ha): 0.26

		<p><i>For office use only:</i></p> <p>Representor No.</p> <p>Date received: 31/3/15 (ebo or)</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection
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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	BRUCE EVANS	GERAINT LEWIS ASSOCIATES
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)	
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	BARMOUTH
Constraints Map	
Appendices (please specify)	LATE SUBMISSIONS Ref no. LS 040

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.

Discussions held originally with Ms Nia Davies Planning Policy Unit Offices in Bangor. Correspondence to the Policy Unit along with submissions of why this land should be included. Particular reference being made to the fact that the Planning Approval that the land had was still extant and current when the decision appears to have been made to exclude this land from being within the Development boundary.

Correspondence with Planning Authority along with Approval, Drawings and Documentation included as part of the submission made to the Policy Unit for the land to be re included within the Development Boundary.

*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

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.

THE Land for which Planning Permission was granted on the 1st July 2009 whilst the Unitary Development Plan was still current (and is to present day) should be re included within the Development Boundary for Barmouth.

The Land met Planning Policy requirements at that time and thus must hold to be in accord with Policies at present time since the UDP (Draft Proposed Modification Version 2008 has not yet been superseded by the LDP.

Barmouth has been identified in the LDP consultation process as requiring 27 no. dwellings to full fill it,s housing requirements for the term of the LDP.

This Site represents a parcel of land that was previously considered suitable for development under the UDP but would also meet Planning Windfall criteria.

2dd. Is the Deposit Plan sound?																			
Yes				<input type="checkbox"/>				No				<input type="checkbox"/> NO							
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 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.	<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.

CE 2 – ALLOCATIONS OF LAND

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:

AS PREVIOUSLY SUBMITTED – SITE PLAN
COPY OF PLANNING APPROVAL
CORRESPONDENCE AND ADDITIONAL DOCUMENTATION TO PLANNING DEPT AND POLICY UNIT

Signed: GERAINT	Dated: 31 st MARCH 2015
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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

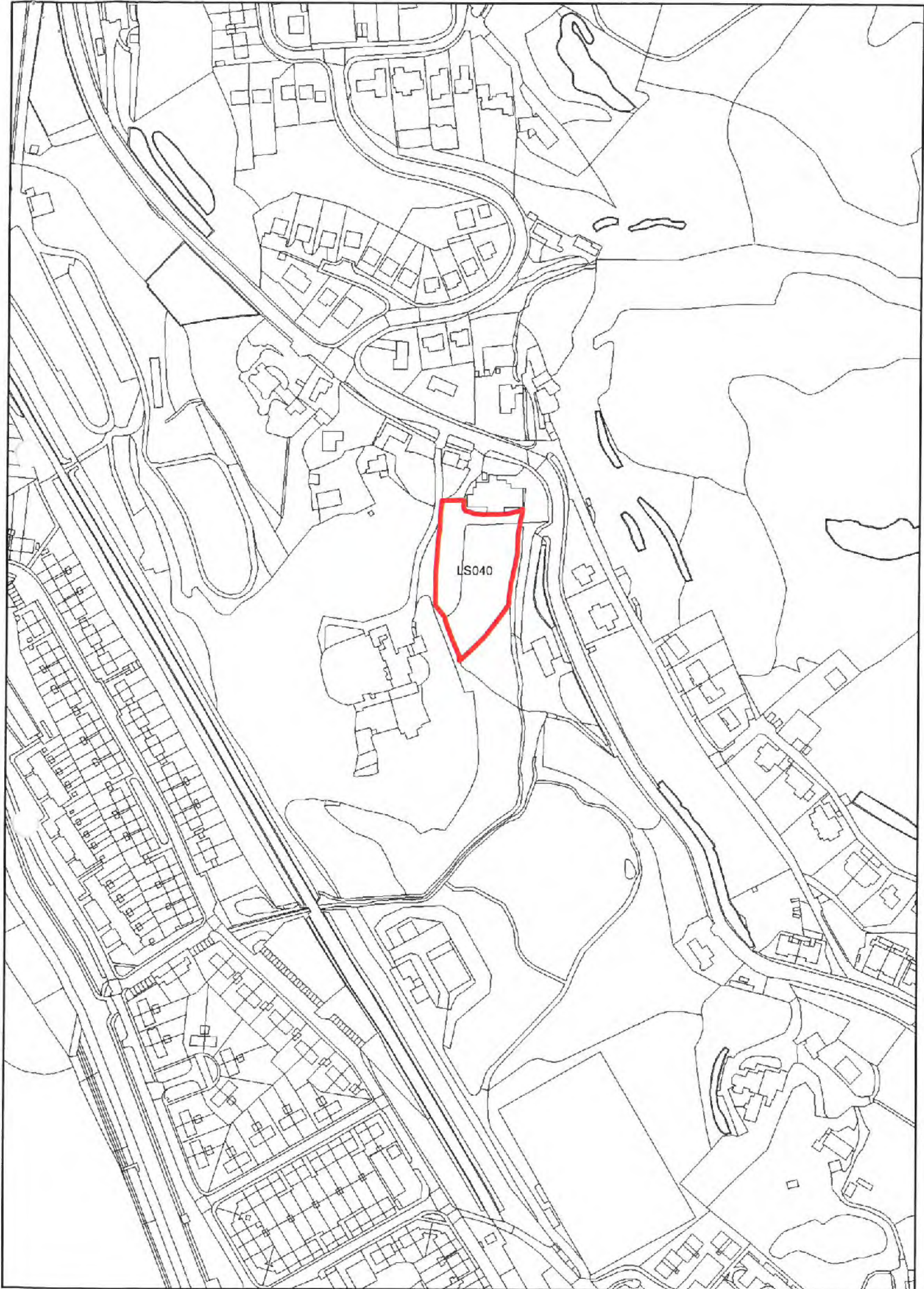
**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

Test of Soundness

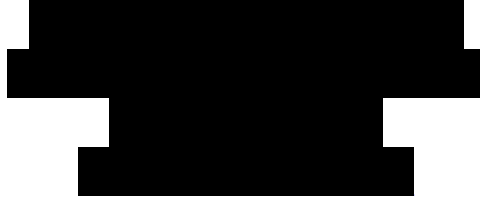
Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use 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.



BARMOUTH TOWN COUNCIL – CYNGOR TREF ABERMAW



17th March 2015,

Ms Nia Davies,
Planning Policy Section,
Gwynedd Council,
CAERNARFON,
LL55 1SH

Dear Ms Davies,

Re. Anglesey and Gwynedd Joint Local Development Plan

At the meeting of Barmouth Town Council held on Tuesday 24 February representation was made by Mr Bruce Evans, Hendre Mynach, Barmouth and his Agent Geraint Lewis Associates, relating to Mr Evans property at Hendre Mynach.

Previously a hotel, Mr Evans property includes a large open area that was previously the hotel car park, adjacent to the house. The development boundary cuts through Mr Evans' property, excluding this large open area from the development area, despite the fact that Mr Evans had planning permission for two dwellings on this piece of land – planning permission which has subsequently lapsed due to unforeseen circumstances.

The town council had a full discussion about the circumstances Mr Evans and his Agent outlined – supported both by letter and through Mr Evans' attendance at the meeting. As planning permission for two dwellings has previously been approved on this land, and in light of the fact that some 90 new dwellings are recommended for the Barmouth area (a number which may not be achieved within the existing time frame), the Town Council is in unanimous agreement that the area of land owned by Mr Evans (adjacent to his home, and previously having been granted planning permission for two dwellings) should be included within the development area.

Yours sincerely,

Sue Phillips
Clerk to Barmouth Council