

AS/DB/374

1366-923-ADD034-MAP73  
LWYD Y GŵR.

		<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15 LWYD</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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) Separate forms should be completed for each comment that you wish to make.

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

**PART 1: Contact details**

	Your details/ Your client's details	Agent's details (if relevant)
Name	Mr B Carter	Cadnant Planning Ltd
Address		[REDACTED]
Postcode		
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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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

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

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

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

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

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

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	The Strategy, Settlement Boundaries, TAI17
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	73
Constraints Map	
Appendices (please specify)	

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

**2c. Please provide details of your representation on the Deposit Plan.**

We wish to object to the omission of land at Hewden’s Plant Hire and the land immediately adjacent from the draft Local Development Plan’s development boundary of Llandygai.

The land in question is outlined in red in the plan attached to this form. The land is currently included within the development boundary of the adopted Unitary Development Plan. The site is within a sustainable location, situated adjacent to two key employment zones, Llandygai Industrial Estate and Parc Bryn Cegin.

Planning Policy Wales identifies within paragraph 4.7.2 that  
*“Development plans need to provide a framework to stimulate, guide and manage change towards sustainability. They should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities. In their land allocation policies and proposals, local planning authorities should:*

- *Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and bicycle and public transport is good;*
- *Maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;*
- *Foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;*
- *Locate development so that it can be well served by existing infrastructure (including for energy supply, waste management and water);*
- *Ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;*
- *Locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime;*
- *Ensure that tackling the causes and consequences of climate change is taken into account in locating new development.”*

*Please use additional sheet if necessary.  
Please state how many additional sheets have been used...2*

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

We wish to object to the exclusion of land at Hewden's Plant Hire and the adjacent warehouse from the development boundary of Llandygai as it is considered that the exclusion of this substantial previously developed land is contrary the advice contained within Planning Policy Wales.

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

We wish for the sites to be included within the development boundary of Llandygai.

**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 checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" 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.

Given that there is a substantial change between the adopted UDP development boundary and the draft LDP development boundary which now excludes substantial previously developed land and buildings we wish to test the Council's reasoning through discussion and clarification at the hearing.

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption

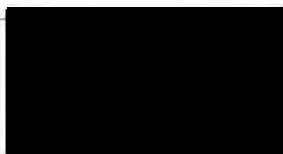


#### If additional documents have been provided to support your representations, please list below:

The continuation of section 2c

Location Plan

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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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

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

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

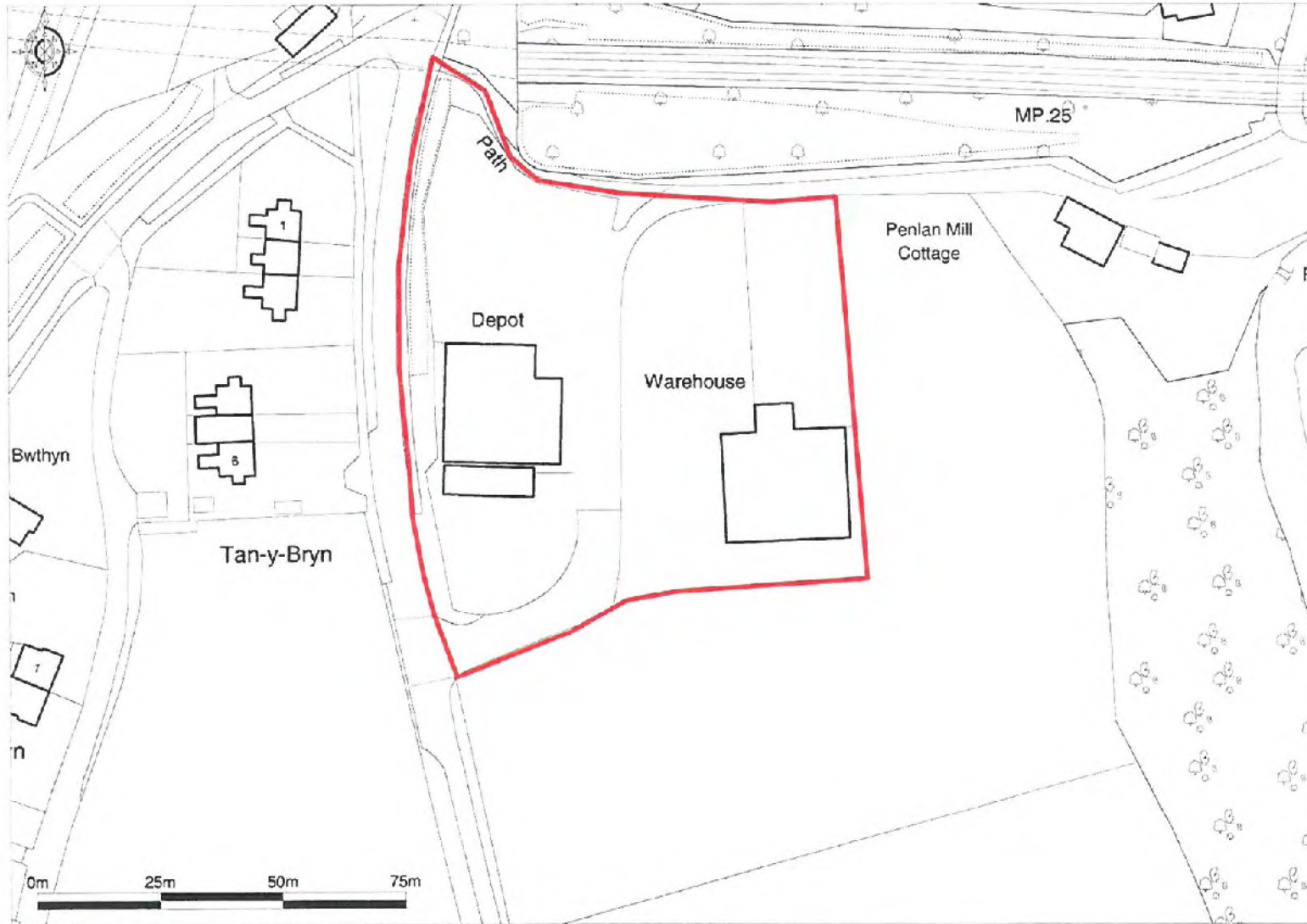
## Test of Soundness

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

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

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

Hewden Depot, Llandygai



Ordnance Survey © Crown Copyright 2015. All rights reserved. Licence number 100022432. Plotted Scale - 1:1250



Cadnant Planning

## The continuation of section 2c.

Paragraph 4.7.4 goes on to identify that

“Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with **minimising the need to travel and increasing accessibility by modes other than the private car**. A broad balance between housing and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Local authorities should adopt policies to locate major generators of travel demand such as housing, employment, retailing, leisure and recreation, and community facilities including libraries, schools and hospitals within existing urban areas or in other locations which are, or can be, well served by public transport, or can be reached by walking or cycling<sup>15</sup>. Preparing accessibility profiles for public transport, walking, cycling and freight may assist local authorities in plan preparation and assessing possible development sites. Wherever possible, developments should be located at major public transport nodes or interchanges. **Higher density development**, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).”

Paragraph 4.7.7 states that

“For most rural areas the opportunities for reducing car use and increasing the use of public transport, walking and cycling are more limited than in urban areas. **In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes** when compared to the rural area as a whole. Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities and be identified as the preferred locations for most new development including housing and employment provision. The approach should be supported by the service delivery plans of local service providers.”

As previously identified, the sites excluded from the proposed development boundary are previously developed land, which are located adjacent to two key employment zones. Locating development adjacent to employment sites is encouraged within national planning policy as they increase sustainability by reducing the need to travel.

Also there is a preference within Chapter 4 of Planning Policy Wales for the re-use of land.

It is emphasised in paragraph 4.9.1 that

*“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The Welsh Government recognises that not all previously developed land is suitable for development. This may be, for example, because of its location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. For sites like these it may be appropriate to secure remediation for nature conservation, amenity value or to reduce risks to human health.”*

Paragraph 4.9.2 goes on to identify that

*“Many previously developed sites in built-up areas may be considered suitable for development because of their re-use will promote sustainability objectives. This includes sites:*



- *In and around existing settlements where there is vacant or under-used land, commercial property or housing;*
- *In suburban areas close to public transport nodes which might support more intensive use for housing or mixed use;*
- *Which secure land for urban extensions, and;*
- *Which facilitate the regeneration of existing communities.”*

Paragraph 4.9.3 identifies that

*“If the Welsh Government’s objectives for the more sustainable use of land and buildings and the re-use of previously developed sites are to be achieved, local authorities and other stakeholders will need to be more proactive. Wherever possible, local authorities should work with landowners to ensure that suitable sites are brought forward for development and to secure a coherent approach to renewal.”*

Previously developed land is defined as

*“Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage of the development is included, as are defence buildings, and land used for mineral extraction and waste disposal where provision for restoration has not been made through development management procedures.*

*Excluded from the definition are:*

- *Land and buildings currently in use for agricultural or forestry purposes;*
- *Land in built-up areas which has not been developed previously, for example parks, recreation grounds and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings;*
- *Land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings;*
- *Previously developed land the nature conservation value of which could outweigh the re-use of the site; and*
- *Previously developed land subsequently put to an amenity use.”*

Therefore, we wish to object to the exclusion of land at Hewden’s Plant Hire and the adjacent warehouse from the development boundary of Llandygai as it is considered that the exclusion of this substantial previously developed land is contrary to the advice contained within Planning Policy Wales.

After it is adopted the Plan will set out a development strategy and policies to guide the development and use of land in the Plan area until 2026. The statutory consultation on the Deposit Plan includes the opportunity to delete sites, suggest different sites or changes to boundaries to those included in the Deposit Plan. These 'alternative sites' will be subject to a separate consultation as soon as possible after the consultation about the Deposit Plan. An independent Planning Inspector will eventually decide whether they are included in the final Plan. To enable the appointed Inspector to consider your alternative site(s) you must provide all the necessary information and material (including a Sustainability Appraisal incorporating Strategic Environmental Assessment).

An 'alternative site' can be any piece of land which has not been included within the Deposit Plan either as an allocation or within a settlement boundary, which you wish to see considered as an alternative to sites allocated in the Plan. This can include either land previously assessed by the Councils as a Candidate Site or suggesting a different use for a site that has been allocated in the Deposit Plan. It can also include a site allocated in the Deposit Plan which you wish to see deleted or amended.

The Councils will publicise site allocation representations on an 'Alternative Sites Register' to provide an opportunity for comment by environmental consultation bodies, stakeholders and the public on the site(s) and all accompanying information (including the Sustainability Appraisal incorporating Strategic Environmental Assessment).

### How do I submit an alternative site?

- You must submit your 'alternative site' as part of an objection to the Plan using the online consultation portal or the Deposit Plan Response Form (available from each Council's website from the 16 February 2015, or by contacting the Joint Planning Policy Unit – details below).
- You must submit any 'alternative site' representation during the Deposit Plan consultation period (16 February to 5pm 31 March 2015).
- You must submit a plan of the site you wish to be considered with your online representation or attach it to your Response Form. This must be an Ordnance Survey type map, of minimum scale 1:2500, outlining the land for consideration in RED. If it is a new site, points of access should be clearly marked.
- If it is a new site or an alternative use to an allocated site, you must demonstrate in your submission that the site accords with the Plan's strategy and that the Plan would be sound if the site is included in the final Plan.
- You must test the sustainability effects of new sites. This is called Sustainability Appraisal (SA) and incorporates Strategic Environmental Assessment (see below for more information).
- If you wish to delete a site allocated in the Deposit Plan or amend its boundaries, you must demonstrate in your submission how its inclusion makes the Plan unsound, referring to the Plan's strategy, the Sustainability Appraisal, the Sites Assessment Report (Topic Paper 1A) or any other Topic Paper, as appropriate.
- You must include sufficient information with your submission for the Council to carry out a Habitats Regulations Appraisal if inclusion of the alternative site in the Plan is likely to change the Plan significantly. If necessary, Habitats Regulations Appraisal will be carried out by the Council to ensure no significant effects on any European site of nature conservation importance (see below for more information).

### What is a Sustainability Appraisal?

Sustainability Appraisal is a process that considers the likely social, economic and environmental impacts of a proposal, including alternative development sites, against local sustainability objectives. The Councils' Sustainability Appraisal incorporates the regulatory requirements of the Strategic Environmental Assessment. The Sustainability Appraisal should include evidence regarding:

- The site's compatibility with the Plan's strategy;
- Any substantial physical, ecological, environmental and geological constraints to development of the site and the potential for mitigation measures to overcome or reduce these;
- The sustainability of the site in relation to availability and accessibility of infrastructure, community facilities and services, public transport and the use of brownfield land.

The alternative site may have already been assessed as part of the Council's earlier assessment of sites (see the Deposit Plan SA Report; and the Site Assessment Report). You may object to the outcome of the Council's assessment and seek to have that site included or have the site excluded.

Alternative site representations will be dealt with at the Examination as objections to the soundness of the Plan. It is essential for you to demonstrate why you do not consider the Council's assessment to be sound (i.e. based on good evidence).

### How do I undertake a Sustainability Appraisal (SA)?

It is important that your assessment of the site is consistent with the Councils' candidate site assessment methodology, set out in Topic Paper 1 (2013) and Topic Paper 1A (2015), and Sustainability Appraisal methodology, set out in the Deposit SA Report. Please note also that the Welsh Language Impact Assessment has informed the conclusions of the Sustainability Appraisal.

All assessments should be undertaken using the Sustainability Objectives established in the SA Scoping Report and used in the Deposit SA Report. These objectives are listed below in Appendix 1. The full SA report is available in public local libraries in Gwynedd and Anglesey, Siop Gwynedd in Caernarfon, Dolgellau and Pwllheli and the Planning Service's Reception, Rôvacabin, Llangefni. The report and the Welsh Language Impact Assessment report are available on each Council's website: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp). This paper details the sustainability baseline, issues and objectives which you may find useful in undertaking your assessment. If a new or alternative site has not been subject to Sustainability Appraisal it is unlikely that the Inspector will be able to recommend its inclusion in the Plan. In the absence of essential evidence the Inspector would be unable to conclude that the Plan would be sound with that change.

### What information is needed for the Habitats Regulations Appraisal?

If your development proposal for the new or alternative site is likely to cause the Plan to change significantly and may have a likely significant effect on any European site of nature conservation importance you will need to ensure that sufficient information is provided for the Council to

undertake a Habitats Regulations Appraisal. This includes detailed information on the site's physical, environmental and geological condition and the proposed use of the site. Much of this information would be included in the environmental information provided with your Sustainability Appraisal of your site. European nature conservation sites are identified on the Deposit Plan Constraints Maps. Natural Resources Wales can provide more information on specific European sites of nature conservation importance (see web link below).

#### Where can I find more information on how to prepare the necessary appraisals?

For more information on undertaking your appraisal the following websites may be of assistance: CCW Guidance on Strategic Environmental Assessment (SEA): <http://www.ccw.gov.uk/landscape-wildlife/managing-land-and-sea/environmental-assessment/strategic-environmental-assess.aspx?lang=en>

NRW information on European sites: <http://naturalresourceswales.gov.uk/conservation-biodiversity-and-wildlife/european-protectedspecies/information-on-european-protected-species/?lang=en>

SEA Directive: <http://www.opsi.gov.uk/legislation/wales/wsi2004/20041656e.htm>

DCLG Guidance on SEA: <http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

Welsh Government Technical Advice Note 5: Nature Conservation and Planning (see Annex 6 – Habitats Regulations Appraisal of Plans, page 75):

<http://wales.gov.uk/topics/planning/policy/tans/tan5/?lang=en>

Welsh Government Technical Advice Note 20: Planning and the Welsh Language

<http://wales.gov.uk/topics/planning/policy/tans/planning-and-the-welsh-language/?lang=en>

Welsh Government Practice guidance on planning and the Welsh language

<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/8855237/?lang=en>

The Anglesey and Gwynedd Deposit Joint Local Development Plan is available to view at the Joint Planning Policy Unit's offices, 1<sup>st</sup> Floor Bangor City Council Offices, Ffordd Gwynedd, Bangor, in Anglesey and Gwynedd public libraries, the Planning Service Reception, Rovacabin, Llangefni and Siop Gwynedd in Caernarfon, Dolgellau and Pwllheli and on the Councils' websites, with copies available on CD on request.

Further information on the Deposit Plan and this process is available on the Council website [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp) or from:

The Joint Planning Policy Unit.

1<sup>st</sup> Floor Bangor City Council Offices,

Ffordd Gwynedd,

Bangor LL57 1DT

Email: [planningpolicy@gwynedd.gov.uk](mailto:planningpolicy@gwynedd.gov.uk)

Telephone: 01766 771000 or 01286 685003

Website: [www.gwynedd.gov.uk/ldp](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

## Appendix 1: Sustainability Appraisal Objectives

1. Maintain and enhance biodiversity interests and connectivity  
(SEA Topics: biodiversity, fauna, flora, soil)

7. Provide good quality housing, including affordable housing that meets local needs (SEA Topic: population, human health)

- |  |  |
|--|--|
| <p>2. Promote community viability, cohesion, health and well being<br/>(SEA Topics: human health, population)</p>  | <p>8. Value, conserve and enhance the plan area's rural landscapes and urban townscapes<br/>(SEA Topics: landscape)</p>                                      |
| <p>3. Manage and reduce the impacts of climate change by promoting and supporting mitigation and adaptation measures<br/>(SEA Topics: climatic factors, air)</p> | <p>9. Use land and mineral assets efficiently and promote mechanisms for waste minimisation, re-use and recycling<br/>(SEA Topic: material assets, soil)</p> |
| <p>4. Conserve, promote and enhance the Welsh language<br/>(SEA Topic: cultural heritage)</p>  | <p>10. Promote and enhance good transport links to support the community and the economy<br/>(SEA Topic: population, human health)</p>                       |
| <p>5. Conserve, promote and enhance cultural resources and historic heritage assets<br/>(SEA Topic: cultural heritage)</p>                                       | <p>11. Safeguard water quality, manage water resources sustainability and minimise flood risk<br/>(SEA Topic: water, biodiversity)</p>                       |
| <p>6. Support economic growth and facilitate a vibrant, diversified economy providing local employment opportunities<br/>(SEA Topic: Population)</p>             |  |

## Appendix 2: Example Sustainability Appraisal Matrix

The matrix below was used to assess the allocated sites within the LDP Deposit. The following symbols in the key (shown below) are inserted in the 'Assessment' column. The symbols in this column indicate whether the site contributes to meeting the SA Objective positively; is compatible with the SA Objective; whether the site has a neutral impact on the SA Objective; or whether the site is an obstacle to meeting the SA Objective. The 'Summary' column needs to provide a commentary of the assessment.

### Key

++	Development actively encouraged as it would resolve an existing sustainability problem	+/-	Potential sustainability issues; mitigation and / or negotiation possible
+	No sustainability constraints and development acceptable	-	Problematical and improbable because of known sustainability issues; mitigation or negotiation difficult and / or expensive
0	Neutral	--	Absolute sustainability constraints
?	Unknown/uncertain effect		

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 1188, 1189, 1190, 1191 1192, 1193, 1194, 1195, 1196, 1197, 1198,</p> <p>Date received: 3/3/15 1202 <i>W</i></p> <p>Date acknowledged:</p>
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**Data Protection**

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**PART 1: Contact details**

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

#### Guidance Note.

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

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

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

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

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

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

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

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

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

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

Enwan Hebydd (Abodhad 4)

<b>2a. Which part of the Deposit Plan are you commenting on?</b>	
Policy number (please specify)	TAI 17 HOUSING IN LOCAL, RURAL + COASTAL VILLAGES
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

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

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



**Part 3: What Happens Next?**

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

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

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



I want to speak at a hearing session.



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

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

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



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

Signed:



Dated:

31/3/15

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

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

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

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

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

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

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

### Test of Soundness

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

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

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

#### **Garreg-Llanfrothen**

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

#### **Groeslon**

- Groeslon 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.

#### **Llandwrog**

- Llandwrog 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.

#### **Llandygai**

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

#### **Llangybi**

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

#### **Llanllyfni**

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

#### **Llanystumdwy**

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

#### **Nantlle**

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

#### **Pensairwaun**

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

#### **Pentre Uchaf**

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

#### **Rhiwlas**

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

Checklist for Comments on Deposit plan

3070-731

Person ID: 3070.

Representation Number: ① 730      ② 731      ③ 733

Date Received:

1) Inputting Comments

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

Date: 20/4/15..... Officer: M.....

Is there a need for a summary?  Y  N

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

Date letter for revised summary sent:.....

Date response received .....

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

2) Translation

Date sent to the Translation Unit: .....

Date translation received: .....

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

3) Acknowledgement

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

Notes:

[Empty box for notes]

REP NO:

ID:

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

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



**Data Protection**

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

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

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**PART 1: Contact details**

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

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

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

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

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

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

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

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

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

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

Yes  No

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

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

**Part 3: What Happens Next?**

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

I want to speak at a hearing session.

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

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

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

Submission of documents and evidence to the examination

Publish Inspector's report

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

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

**THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN**  
*Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.*

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

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

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



## Test of Soundness

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

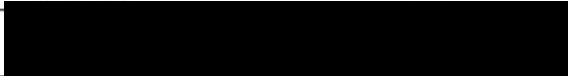
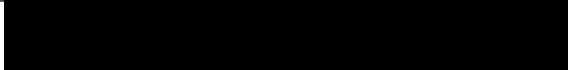
The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to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

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

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

## DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

---

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

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

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

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

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

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

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

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

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

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

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

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

#### 4. Conclusion

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

Person ID: 3070

Representation Number: ① 730 ② 731 ③ 733

Date Received:

1) Inputting Comments

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

Date: 20/4/15 Officer: M

Is there a need for a summary? Y/N

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

Date letter for revised summary sent:

Date response received

Date any amendment to the summary in light of comments received

2) Translation

Date sent to the Translation Unit:

Date translation received:

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

3) Acknowledgement

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

Notes:

Empty box for notes.

REP NO :

ID :

	 <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>eb</i></p> <p>Date acknowledged:</p>
<p>NEED TO SCAN</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.

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**PART 1: Contact details**

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



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

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

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

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

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

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

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

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

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

Yes  No

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

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

**Part 3: What Happens Next?**

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

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

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

I want to speak at a hearing session.

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

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

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

Submission of documents and evidence to the examination

Publish Inspector's report

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

Signed [REDACTED]	Dated: 31/3/2015
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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](http://www.gwynedd.gov.uk/ldp) or [www.anglesey.gov.uk/ldp](http://www.anglesey.gov.uk/ldp)

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

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

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

## Test of Soundness

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

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

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



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

## DEPOSIT PLAN (2015) PUBLIC CONSULTATION RESPONSE

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

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

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

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

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

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



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

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

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

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

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

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

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

#### 4. Conclusion

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